

# ENVIRONMENTAL CHECKLIST

## Purpose of checklist

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

## Instructions for applicants

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

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

## Instructions for lead agencies

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

## Use of checklist for nonproject proposals

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

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

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

Light Rail Transit Facilities Code Amendments

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

Lindsay King, City of Seattle SDCI

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

700 Fifth Ave., Suite 1900

PO Box 34019

Seattle, WA 98124-4019

Lindsay.king@seattle.gov

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

December 20, 2024

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

City of Seattle Department of Construction and Inspections

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

A decision by the City of Seattle on this non-project proposal is expected to occur in the second or third quarter of 2025. Future proposed light rail transit facilities within city limits constructed after code amendments go into effect will be expected to follow the adopted code.

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

No other additions or expansions to this non-project code amendment proposal are anticipated.

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

This non-project proposal amends code requirements for future light rail transit facilities within Seattle city limits and does not authorize construction. Outside of this State Environmental Policy Act (SEPA) process, no additional environmental information is being prepared for this non-project proposal.

Light rail transit facilities along the West Seattle and Ballard Link Extensions are currently in the planning and final design stages. All proposed transit facilities in the West Seattle and Ballard Link Extension project are going through the National Environmental Policy Act (NEPA) review process. The West Seattle and Ballard Link Extension planning process included preparation of a Draft Environmental Impact Statement (DEIS), which underwent an agency and public comment period. A Final Environmental Impact Statement (FEIS) has been prepared for the West Seattle Link Extension. Additionally, a Racial Equity Toolkit Report: Environmental Review Phase document has been prepared as part of the project review.

The Graham Street Infill Station is also currently in the planning stage. No environmental documentation for this project appears to be publicly available at this time. Sound Transit indicates the conceptual design and environmental review will begin in Q3 2024, after a preferred design alternative has been identified.

**9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

No known applications are pending for approvals directly affecting all of the parcels covered by this proposal. The property covered by this non-project proposal is citywide that includes many individual parcels with differing improvements, uses and configurations. As described in detail in the response to Question #8 above, Sound Transit is in the planning and final design stage for light rail transit facilities, including but not limited to, multiple light rail transit facilities in Seattle. Sound Transit is performing a National Environmental Policy Act (NEPA) analysis for these transit facilities and will obtain all other applicable governmental approvals throughout the planning and future construction stages.

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

The proposed light rail transit facility code amendments will require Seattle City Council approval by ordinance following standard legislative rules and procedures. No other agency approvals are anticipated or required.

Future proposed light rail transit facilities that would be subject to proposed code amendments will be required to adhere to all applicable federal, state, and City codes, laws, standards, and regulations. This includes, but is not limited to, the following:

- All transit facility elements outside the public right-of-way must adhere to Seattle Municipal Code (SMC) Title 23 (Land Use Code). All such elements will be subject to Seattle Department of Construction and Inspections (SDCI) permitting requirements.
- All transit facility elements within the public right-of-way must adhere to SMC Title 15 (Street and Sidewalk Use). All such elements will be subject to SDOT permitting requirements.
- All transit facility elements, regardless of location, must adhere to SMC Title 21 (Utilities) and Title 25 (Environmental Protection and Historic Preservation).
- If a transit facility is proposed within a Historical, Landmark, or other Special Review District, review and approval by the relevant Board may be required.
- If a light rail transit facility project receives any federal funding or has any other federal nexus, the project must comply with NEPA requirements.
- Permits obtained through SDCI and SDOT will comply with Seattle Municipal Code 25.05 Environmental Policies and Procedures.

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

The proposal is a non-project code amendment action proposed by SDCI. It consists of several code amendments that together affect how the City's Land Use Code and environmental codes will be used in future permit reviews, and future review processes, for the West Seattle Link Extension (WSLE) and Ballard Link Extension (BLE) projects.

Light rail transit facilities are an “essential public facility.” Light rail service is an important part of the City’s growth strategy in its Comprehensive Plan. Continuing to implement light rail helps support transit-oriented development that is the most effective growth strategy because it accomplishes greater transportation mobility, affordable housing objectives, efficient land use, and economic development. The proposed amendments update, clarify, and revise the codes that will be applied to future Light Rail Transit Facility permits to provide greater detail and specificity, with the intent of providing for process streamlining and clarity in future permitting.

The major elements of the proposal are:

- 1. Update the definition for light rail facilities and create new development standards** . The proposal includes updating the definition of light rail transit facility to better align with the companion state law definition (RCW 81.112.020), thereby including structures necessary to support the development of a light rail transit system. Proposed new development standards in Chapter 23.80 of the Land Use Code would set minimum standards for the design of light rail structures, primarily at light rail stations. The creation of light rail development standards is intended to 1) create consistency in the minimum requirements for light rail station design within every zoning designation in the City, 2) positively influence the quality of design outcomes for light rail transit facilities, 3) provide minimum standards that are specific to the nature and use of light rail transit facility sites. The development standards are a complement to the City of Seattle Light Rail Design Guidelines already adopted by a prior action (see SDCI Director’s Rule 2-2024). The proposed development standards will help in the City’s permit review process by addressing design details related to size, shape, aesthetic qualities and details about streets and access, parking, and signage. These new standards will substitute for the general development standards of each zone’s regulations, many of which were developed to define requirements for residential, commercial, institutional, and industrial uses and do not relate to a light rail transit facility use as a linear transportation facility.

***Minimum development standards for aesthetic qualities***

- Blank facade limits
- Facade transparency and modulation
- Landscaping and screening features
- Entry features designed for visibility and wayfinding
- Relationship to zoned height limits

***Minimum development standards for functional qualities***

- Overhead weather protection
- Access and street improvements (and provisions for transit-supporting features to be off-site, such as bus layover spaces)
- Amend the minimum bicycle parking requirements and add new shared micromobility device parking requirements
- Pedestrian lighting
- Signage and wayfinding

- Light/glare and odor control
- Solid waste disposal.

2. **Establish an advisory review process by the Seattle Design Commission (SDC) to evaluate light rail transit facility design proposals and make recommendations to the Director.** Previous light rail transit facilities were reviewed by a Light Rail Review Panel which included participation by the Seattle Design Commission. Most recently, the NE 130<sup>th</sup> Street station was reviewed by the SDC per authority granted in SMC 3.58. The code amendment proposed in SMC 23.80 intends to clarify the process and scope of SDC reviews to inform the Master Use Permit review process. The SDC will conduct a review of light rail development proposals and make recommendations to Sound Transit and City departments about the proposals' aesthetic, urban design, and functional qualities. The proposal defines the subjects of the SDC review for this kind of system development proposal, including: architectural, aesthetic, and urban design qualities; transportation, pedestrian accessibility, and circulation sufficiency; quality and type of public amenity features and spaces; wayfinding legibility and signage; and public art. City departments will consider the SDC recommendations as they prepare future permit decisions on light rail developments.
3. **Clarify and improve permit processes, for specificity and efficiency.** The City proposes to maintain a public process for Master Use Permits to allow construction of Light Rail Transit Facilities but remove redundant appeal opportunities for certain permits:

**A. "Type I" Master Use Permit reviews:** Permits for temporary uses that would support construction of light rail transit facilities and permits to construct Essential Public Facility structures would be changed from a "Type II" to a "Type I" decision, which allows permits to be appealed directly to Superior Court. . Master Use Permits will be required for numerous sites along the path of light rail development for West Seattle Link Extension. An unknown number of permits will be required for the Ballard Link Extension.

Temporary uses to construct light rail transit facilities are described in SMC 23.42.040.F. The Director may authorize a temporary structure or use that supports the construction of a light rail transit facility which could include but is not limited to allowing places where construction equipment and materials are stored and staged, and construction-related activities will occur. Temporary use permits to construct light rail transit facilities do not authorize permanent light rail uses such as guideways, tunnels or light rail structures permitted through Essential Public Facilities permits.

Essential public facility permits authorize use of a site and/or a structure associated with Light Rail Transit facility development. Structures may include, but are not limited to, light rail stations and traction power substations. Essential public facilities permits are not currently required for light rail guideway and/or tunnels.

The proposed code changes include:

- Updates to procedural details such as the contents of public notices, expectations for public meetings, and other permitting details. Updates to the Master Use Permit review process for a new Type I decision will maintain public notice, comment, and posting of signs to be

required for these Type I reviews that are comparable to existing practices for “Type II” temporary use permit reviews.

- A Type I decision may be appealed to Superior Court.
- The City’s Type I permit reviews would maintain the ability to require conditions of approval.
- Changes to allow temporary uses and essential public facility permits as a new Type I decision will not change the Master Use Permit review process for environmentally sensitive areas permitted through the Environmentally Critical Areas Ordinance (SMC 25.09) and Shoreline Master Plan (SMC 23.60a).
- Updates to when Light Rail Transit Facilities permits may be submitted for review, vesting date and expiration date for Master Use Permits.

**B. Other permit reviews made easier and more focused:** The proposal’s code amendments would allow permit reviews to be more efficiently done, by eliminating unnecessary analyses in each permit decision, such as “proving” adequate funding for light rail and requiring alternatives analysis after Seattle City Council has confirmed the siting of the Essential Public Facility. would also clarify and confirm the City’s authority to require conditions of approval, as well as the flexibility of certain code provisions as they relate to light rail project permit reviews. This will help written permit decisions be briefer and more focused in how they discuss future light rail projects’ consistency with code requirements.

4. **Clarify and streamline the content of review for an ECA exception permit.** The proposal clarifies requirements for an environmentally critical areas “ECA exception” permit for light rail facilities. This would streamline application materials to not require analyzing irrelevant scenarios about other land uses might be possible on a site, a reasonable use analysis, or alternative siting of a proposal. The code will be updated to acknowledge that the Essential Public Facility will be ‘sited’ by Seattle City Council through ordinance or resolution in advance of permits being issued in an environmentally critical area. Also, it would: give more flexibility to prioritize restoration of ecological function when considering mitigation sequencing criteria. The changes would include flexibility to adjust a buffer width to not include improved roadways if those roadways do not contribute to ecological functions.

The objectives include: streamlining required materials for light rail projects to avoid unnecessary information; maximizing the overall positive qualities of impact mitigation outcomes by giving more flexibility to weigh and balance “restoration” and “compensation” values along with impact “minimizing” values; and setting buffers, in relation to light rail projects, that avoid unnecessary overlaps of buffers with other nearby properties.

5. **Define a “tree and vegetation management plan” requirement for project segments of the light rail system development.** The proposal defines a new requirement for Light Rail Transit Facility construction to create a project-wide tree and vegetation management plan that accounts for tree management before, during and after construction. The plan would describe the light rail segment’s overall construction impacts to trees in affected properties and streets, and include an explanation of the approach to mitigating tree impacts, establish tree protection requirements, best management practices to be used during and after construction, and list requirements for tree and vegetation management once construction is complete. The tree and

vegetation management plan would maintain existing City policies for tree replacement. A project level tree and vegetation management plan will allow for stakeholder involvement, including Tribes and other community and environmental organizations, in advance of permit submittals. This is preferable to an approach that would review these impacts and mitigations on a permit-by-permit basis. The City would review and approve the plan before construction would occur.

6. **Clarify a one-year review step for a construction noise variance for light rail transit facilities construction.** The light rail system's construction will occur over several years. Sound Transit anticipates work that will be noisy at different levels through the day, with some possible night-time activities. When construction activities exceed the noise allowed per the Noise Ordinance (SMC 25.08) a major public project construction noise variance is required. The noise variance process includes detailed review of project proposals and allows the Director to condition construction activity to ensure that construction noise protections are well-designed and will not disrupt public health and safety, particularly at night.

The proposal clarifies that: construction noise variances are subject to an appeal to the Hearing Examiner when the initial permit decision is made; but that, at the 1-year mark, a review of this construction noise variance would not be subject to an appeal to the Hearing Examiner. The City noise enforcement program would continue to evaluate performance according to the terms of the variance over time, and could require adjustments of noise mitigating practices by ST, if needed.

7. **Amend existing minimum bicycle parking requirements and add new shared micromobility device minimum parking requirements.** The proposal adjusts minimum bicycle parking requirements for light rail transit station facilities, to better account for several factors that will influence demand for bicycle parking at stations. This expands on and clarifies the existing code's one-size-fits-all approach that lacks key definitions and has never been used since its adoption in 2018. The proposal accounts for differences in demand that will occur at different stations based on a typology of stations (terminus, local, mid-center and central types); and uses assumptions relating to proportion of bicyclists that will take their bicycles on-board with them, peak hours ridership, subtraction of train-to-train rider transfers, and allocation among short-term and long-term types of bicycle parking.

The proposal also prescribes a minimum day-of-opening provision level of 54 bicycle parking spaces (36 long-term and 18 short-term) at any station that supersedes if the minimum requirement calculation for a given station falls below 54 spaces.

The proposal includes a new minimum parking provision for shared micromobility devices - 120 square feet at most stations, with an additional 120 square feet (240 square feet total) at terminus stations.

The proposal also accounts for future possible increases in bicycle usage (as forecast by Seattle transportation plans) by defining a future provision of additional bicycle parking at a later date if future demand exceeds day-of-opening supply. If high parking levels are identified by future monitoring, additional supply would be provided. The bicycle parking facilities would be designed in ways that accommodate possible future increases, and would be designed in ways

that will accommodate a range of different types of bicycles such as cargo bicycles and motorized bicycles.

- 12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

This non-project proposal affects the anticipated future provision of light rail development actions across the City of Seattle. This includes segments that will be developed between West Seattle and Downtown Seattle, and Downtown Seattle to Ballard. These known future projects will travel through neighborhoods and areas including: West Seattle Junction, Delridge, Duwamish River, SODO (Greater Duwamish Manufacturing and Industrial Center), Chinatown/International District, Pioneer Square, other portions of the Downtown Urban Center, South Lake Union, Uptown, Elliott Avenue corridor, Interbay, and Ballard.

The proposal's amendments are also expected to apply to other future possible improvements to the light rail system. This could include projects such as the Graham Street station in southeast Seattle.



## B. Environmental Elements

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

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

This non-project proposal does not correspond to a particular site.

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

This non-project proposal does not correspond to a particular site. See the “Location of the Proposal” description earlier in this checklist. The span of areas that might be indirectly affected by amended code includes many areas that are flat or modestly sloping, and limited portions of areas that are hilly, or in local valleys, within Seattle’s context of urban developed land uses and landforms.

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

This non-project proposal does not correspond to a particular site, which means the requested information cannot be estimated. Seattle consists of slopes that generally range from flat to above 20%.

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

This non-project proposal does not correspond to a particular site. Types of soils in the relevant affected areas include a broad range of native soils that comprise Seattle’s hilly and lowlands landforms, soils amended by past development activities, and also fill soils that were placed more than 100 years ago such as in the SODO area, for example. There are numerous types of soils found throughout Seattle, but none are agricultural or of long-term commercial significance.

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

This non-project proposal does not correspond to a particular site, which means the requested information cannot be estimated. There are indications and a history of unstable soils in certain locations within city limits. These locations have been designated by the City as environmentally critical areas and are subject to development restrictions. This non-project proposal applies to future light rail transit facilities proposed within city limits and does not authorize construction of light rail transit facilities. Proposed light rail transit facilities within or near unstable soils designated as environmentally critical areas must comply with SMC 25.09 (Environmentally Critical Areas Code).

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

This non-project proposal does not correspond to a particular single site or development, which means the requested information cannot be estimated. Light Rail Transit Facilities code amendments will inform design of future light rail transit facilities within City limits and do not authorize

construction. Future light rail transit facility designs reviewed for consistency with adopted code and may propose filling, excavation, or grading. Any ground disturbance activities will be required to comply with all applicable laws, regulations, and standards, including SMC 22.170 (Grading Code) and City of Seattle standard plans on acceptable fill sources.

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

This non-project proposal does not correspond to a particular single site or development, which means the requested information cannot be estimated. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facility proposals will be reviewed for consistency with adopted code and will be required to comply with all applicable laws, regulations, and standards, including SMC 22.170 (Grading Code) and SMC Title 22, Subtitle VIII (Stormwater Code).

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

This non-project proposal does not correspond to a particular single site or development, which means the requested information cannot be estimated. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facility proposals reviewed for consistency with this adopted code and may add new or replace existing impervious surfaces. All proposed light rail transit facilities will be required to comply with all applicable federal, state, and local laws, regulations, and standards on impervious surface, including SMC Title 22 (Building and Construction Codes), Title 23 (Land Use Code), and Title 25 (Environmental and Historic Preservation).

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

This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facility proposals reviewed for consistency with adopted code will be required to comply with all applicable laws, regulations, and standards, including SMC 22.170 (Grading Code) and SMC Title 22, Subtitle VIII (Stormwater Code). Once approved, projects undergoing construction will be required to follow best management practices (BMPs) for control of erosion and stormwater.

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

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

This non-project proposal does not correspond to a particular single site or development, which means the requested information cannot be estimated. See the response to Question D.1 later in this checklist regarding non-project proposal impacts.

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

No. This non-project proposal provides code amendments for future light rail transit facilities within

city limits and does not authorize construction. Off-site sources of emissions or odor will depend on the proposed locations of future light rail transit facilities.

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

None proposed. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. It will not result in air emissions. All future light rail transit facility proposals that would be subject adopted codes and will be required to comply with all applicable federal, state, and local laws, regulations, and standards on air quality impacts during construction, operation, and maintenance of proposed facilities.

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

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

**1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

No. This non-project proposal does not correspond to a particular site or development. Multiple surface water bodies are located within and adjacent to city limits.

See the response to Questions D.1, D.2, and D.4 later in this checklist for more discussion about the non-project proposal.

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

No. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. If a future light rail transit facility that is reviewed for consistency with adopted codes is proposed over, in, or within 200 feet of surface waters, the project will be required to comply with all applicable federal, state, and local laws, regulations, and standards for construction, operation, and maintenance of a facility near surface water bodies.

See the response to Questions D.1, D.2, and D.4 later in this checklist for more discussion about the non-project proposal.

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

None for this non-project proposal. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. If a future light rail transit facility reviewed for consistency with adopted codes proposes to place material in or remove material from a surface water body or wetland, the project will be required to comply with all applicable federal, state, and local laws, regulations, and standards for impacts to surface water bodies. This may include, but is not limited to, review and permitting by applicable regulatory agencies and compliance with SMC 25.09 (Environmentally Critical Areas Code) for wetland impacts.

See the response to Questions D.1, D.2, and D.4 later in this checklist for more discussion about the non-project proposal.

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

No, none for this non-project proposal. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facility designs reviewed for consistency adopted codes may require surface water withdrawals or diversions. If so, the project will be required to comply with all applicable federal, state, and local laws, regulations, and standards for impacts to surface water bodies.

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

No. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Portions of land within the city are within a 100-year floodplain zone. If a future light rail transit facility reviewed for consistency with adopted code is proposed within a 100-year floodplain zone, it will be required to comply with all applicable federal, state, and local laws, regulations, and standards for development within a floodplain zone. This includes SMC 25.06 (Floodplain Development Code).

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

No. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facility designs reviewed for consistency with adopted codes may require discharges of waste materials to surface waters. If so, the project will be required to comply with all applicable federal, state, and local laws, regulations, and standards for impacts to surface water bodies. This may include requiring the project to apply for and receive a National Pollutant Discharge Elimination System (NPDES) permit, and permits from other regulatory agencies depending on the type and volume of waste and the receiving water body.

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

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

No. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Depending on the proposed location, construction of a light rail transit facility reviewed for consistency with adopted codes may require withdrawal of groundwater to test for or manage groundwater contamination, or to allow for installation of deep structural elements that extend below the groundwater level. If a future light rail transit facility project that

would be subject to adopted codes proposes to withdraw groundwater, it will be required to comply with all applicable laws, regulations, standards, and best management practices for dewatering groundwater.

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

None for this non-project proposal. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. If a future light rail transit facility that would be subject to adopted codes requires discharge of waste material during construction, operation, or maintenance, it is generally expected that waste will be discharged directly to existing sewer or storm drain infrastructure, with permits and oversight from applicable utility owners and regulatory agencies as required. If waste material does not meet criteria for discharge to existing sewer or storm drain infrastructure, it is generally expected that the waste will be collected and transported to an appropriate disposal site.

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

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

None. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facility designs reviewed for consistency with adopted code will be required to comply with all applicable laws, regulations, and standards for runoff including stormwater. Applicable laws, regulations, and standards will include runoff management during construction activities, and design requirements for how the proposed transit facility structure will manage stormwater. This includes, but is not limited to, SMC Title 15 (Street and Sidewalk Use Code), SMC Title 22 (Building and Construction Code, including Stormwater Code), SMC Title 23 (Land Use Code), and SMC Title 25 (Environmental Protection and Historical Preservation Code).

This non-project proposal does not correspond to a particular site or development. See the response to Questions D.1, D.2, and D.4 later in this checklist for more discussion about the non-project proposal.

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

No, none for this non-project proposal. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facility construction, operation, and maintenance is generally expected to prevent waste materials from entering ground or surface waters by implementing the City of Seattle's standard construction best management practices, and the runoff management requirements described in the previous response.

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

No. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. It is possible that future light rail transit facility designs reviewed for consistency with adopted codes may propose construction that would alter or otherwise affect drainage patterns in the vicinity of the site.

See the response to Questions D.1, D.2, and D.4 later in this checklist for more discussion about the non-project proposal.

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

None proposed. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. It is possible that future light rail transit facility designs reviewed for consistency adopted codes may propose a facility for which the construction, operation, or maintenance results in impacts to existing surface waters, groundwater, runoff water patterns, and drainage patterns. Any future light rail transit facility project that would be subject to this Director's Rule will be required to comply with the Stormwater Code and other applicable federal, state, and local regulations.

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

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

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

This non-project proposal applies to all potentially relevant projects within Seattle city limits. Most vegetation types listed above could be found on land or in surface waters within Seattle, where future light rail transit facilities that would be subject to code amendments for future light rail transit facilities may be proposed.

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

No vegetation would be directly removed or altered in relation to this non-project proposal consisting of amendments to codes relating to requirements for light rail essential public facilities. See the response to Question D.2 later in this checklist for more discussion about the non-project

proposal.

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

This non-project proposal does not correspond to a particular site, and would not directly result in impacts to threatened or endangered plant species. This non-project proposal provides code amendments for future light rail transit facilities within Seattle city limits and does not authorize construction. The Washington Natural Heritage Program indicates that some threatened or endangered plant species are known to exist within city limits. Future light rail transit facilities that would be subject to adopted codes may be proposed near threatened or endangered plant species depending on their location. Future light rail transit facilities that would be subject to adopted codes are generally expected to be proposed in developed urban environments, where threatened or endangered species of plants may be less likely to be present.

See the response to Question D.2 later in this checklist for more discussion about the non-project proposal.

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

This non-project proposal does not correspond to a particular site, and would not directly result in site disturbance impacts. Future light rail transit facility designs that would be subject to proposed code amendments may propose impacts to existing vegetation on site, including removal, replacement, or other alterations. Impacts to trees and other plants are regulated by SDOT Urban Forestry in the public right-of-way, and by SDCI on all other land within city limits.

See the response to Question D.2 later in this checklist for more discussion about the non-project proposal.

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

This non-project proposal does not correspond to a particular site, and thus has no associated noxious weed or invasive species presence. Depending on location, future light rail transit facilities that would be subject to this adopted codes may be proposed within or adjacent to areas that contain noxious weeds or invasive plant species.

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

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

This non-project proposal applies to all potential projects within Seattle city limits and does not correspond to a particular site. The citywide affected area includes urban environments and habitats used by a variety of birds and animals

**Examples include:**

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

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

This non-project proposal does not correspond to a particular site. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Threatened and endangered animal species, including Puget Sound Chinook salmon, bull trout, yelloweye rockfish, and bald eagles, are known to exist within city limits. Future light rail transit facilities that would be subject to adopted codes may be proposed near or within known locations of threatened or endangered species. It is expected that future light rail transit facilities that would be subject to adopted codes will generally be proposed within developed urban areas, where the risk of encountering threatened or endangered species is expected to be reduced. Any future light rail transit facility project that would be subject to adopted codes will be required to comply with the federal Endangered Species Act, which manages direct and indirect potential impacts to threatened and endangered species. Any future light rail transit facility project that would be subject to adopted codes will also be required to comply with SMC 25.09 (Regulations for Environmentally Critical Areas). Among other requirements, SMC 25.09 outlines rules for designation of fish and wildlife habitat conservation areas, and establishes development standards for work in and around these habitat conservation areas.

See the response to Question D.2 later in this checklist for more discussion about the non-project proposal.

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

This non-project proposal does not correspond to a particular site, and thus has no associated migration route presence. In general, the City of Seattle is part of the Pacific Flyway. Migratory birds may benefit from street trees, ground vegetation, and surrounding waterbodies.

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

None, this non-project proposal does not correspond to a particular site. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Any future light rail transit facility project that would be subject to adopted codes will also be required to comply with SMC 25.09 (Regulations for Environmentally Critical Areas). Among other requirements, SMC 25.09 outlines rules for designation of fish and wildlife habitat conservation areas including riparian corridors, and establishes development standards for work in and around these habitat conservation areas.

See the response to Question D.2 later in this checklist for more discussion about this non-project proposal.

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

None, this non-project proposal does not correspond to a particular site and applies citywide. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. The King County government indicates that some invasive animal species, such as European starlings, house sparrows, Eastern gray squirrels, fox squirrels, and domestic cats are known to exist



within urban areas in King County. Additional freshwater and marine invasive animals are also known to exist within King County. Future light rail transit facilities that would be subject to adopted codes may be proposed within or adjacent to areas where invasive animal species are found.

See the responses to questions 5a - 5d above, and the response to Question D.2 later in this checklist for additional discussion.

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

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

None. This non-project proposal includes code amendments for future light rail transit facilities within city limits and does not authorize construction. Gas or electric vehicles and heavy machinery may be used during construction of future light rail transit facilities that would be subject to adopted codes. Completed transit facilities are generally expected to connect to existing City of Seattle utility infrastructure for all energy needs, such as lighting, ventilation, heating, cooling, and escalator and elevator operation.

See the response to Question D.3 later in this checklist.

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

No. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction of any development.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.**

None. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction of any development.

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

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

No. This non-project proposal does not correspond to a particular site or development, and thus lacks site-specific hazard characteristics. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facility proposals that would be subject to adopted codes may require construction activity within or adjacent to known or possible contaminated sites. All proposed light rail transit facilities reviewed for consistency with adopted code Director's Rule must comply with applicable federal laws, rules, regulations, and standards regarding environmental health hazards, including measures for reduction or control of potential hazards. This non-project proposal will not result in environmental health

impacts.

See the response to Question D.1 later in this checklist.

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

See the response to Question 7.a above.

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

See the response to Question 7.a above.

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

See the response to Question 7.a above.

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

See the response to Question 7.a above.

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

None proposed. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction, and thus there are no environmental health hazards associated with it. Future light rail transit facility proposals that would be subject to adopted codes may require construction activity within or adjacent to known or possible contaminated sites. All proposed light rail transit facilities reviewed for consistency with adopted code and Director's Rules must comply with applicable federal laws, rules, regulations, and standards regarding environmental health hazards, including measures for reduction or control of potential hazards.

**b. Noise**

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

No. This non-project proposal does not correspond to a particular site or development, and thus lacks site-specific existing noise. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. In general, future light rail transit facilities that would be subject to adopted codes are expected to be located in areas with ambient noise typical of urban areas including traffic, rail, maritime, air, construction and equipment noise.

See the response to Question D.1 later in this checklist.

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

None. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. The construction, operation, and maintenance of future light rail transit facilities reviewed for consistency with adopted codes will be subject to all federal, state, and local laws, regulations, and standards for noise generation. The Seattle Noise Code (SMC 25.08) includes specific requirements for noise generated by construction work, including limitations on the time of day, duration, and volume of noise that can be generated. Once the transit facility is constructed, noise levels generated by operation and maintenance are expected to be comparable to those at existing light rail transit facilities within Seattle.

See the response to Question D.1 later in this checklist.

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

None proposed. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction.

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

**a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Depending on location, future proposed light rail transit facilities that would be subject to review under adopted codes have the potential to affect current land uses on nearby or adjacent properties. The transit facilities would be sited either in underground locations (likely the case in West Seattle Junction, Downtown Urban Center transit facilities, South Lake Union, Uptown, and Ballard), at or near surface grade (such as in Avalon, SODO, and Interbay), or in elevated transit facilities (such as in Delridge and Smith Cove). Transit facilities could occur partially within rights-of-way, or partly or fully in non-rights-of-way properties, with project siting and designs to be confirmed by future permitting and decision-making. Facility features such as entry lobby/portal structures, transit transfer and layover sites, overhead guideways and platforms, bicycle parking, related equipment and features, and public space improvements could be present within or next to the public realm at transit facility development sites. Future light rail transit facilities that would be subject to adopted codes will be required to comply with all applicable federal, state, and local laws, regulations, and standards for land use.

See the response to Question D.5 later in this checklist, in relation to land use relationships and interpretation of potential adverse impacts due to the non-project proposal.

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

No. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. No project within city limits will be located in the vicinity of working farm or forest land.

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

No. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. No project within city limits will be located in the vicinity of working farm or forest land.

- c. Describe any structures on the site.**

This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Depending on location, future light rail transit facilities reviewed for consistency with adopted codes may be proposed on sites with existing structures. It is anticipated that the code amendments for future light rail transit facilities will be applied to sites with existing buildings or public infrastructure, including but not limited to residences, businesses, industrial facilities, public stairways, rights-of-way, and other public transportation infrastructure.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

No. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Depending on location, future light rail transit facilities reviewed for consistency with adopted codes may require demolition of existing structures. Demolition of any existing structures will be required to comply with Seattle Construction Code (SMC Title 22).

It is anticipated the code amendments will be applied to sites where demolition of some existing structures would occur, depending on the final design. These structures may include residences, businesses, industrial facilities, public stairways, and other public transportation infrastructure.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

This non-project proposal does not correspond to a particular site or development and applies citywide to all zones. This non-project proposal provides code amendments for future light rail transit

facilities within city limits and does not authorize construction. It is expected that future light rail transit facilities reviewed for consistency with adopted codes may be proposed in any location within Seattle where the zoning classification authorizes construction and operation of a public transit facility (permitted in all zones). This includes a variety of sites that range from low-density residential zones to industrial, commercial, and mixed-use zoning categories.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

This non-project proposal does not correspond to a particular site or development and applies to all comprehensive plan designations within the City limits. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facilities reviewed for consistency with adopted codes may be proposed in locations with any comprehensive plan designation, provided the location meets all other applicable laws, regulations, and zoning classifications. All candidate sites have urban designations; some are located in designated Urban Centers, while others are not in Urban Centers or Urban Villages, per existing Comprehensive Plan naming conventions.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

This non-project proposal does not correspond to a particular site or development and applies to all shoreline designations within the City limits. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. If future light rail transit facilities reviewed for consistency with adopted codes are proposed within Seattle's shoreline districts, the site selection, construction, operation, and maintenance of the facility will be required to comply with the Seattle Shoreline Master Program Regulations (SMC 23.60A).

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facilities reviewed for consistency with adopted codes may be proposed within or near environmentally critical areas (ECAs). If transit facilities reviewed for consistency with adopted codes are proposed within ECAs, they will be required to comply with Seattle Regulations for Environmentally Critical Areas (SMC 25.09) in addition to all applicable federal, state, and local laws, regulations, and standards.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. It is not anticipated that future light rail transit facilities reviewed for consistency with adopted codes will include any residential use. Transit oriented development (TOD) in proximity to light rail transit facilities may be possible. Hypothetical future TOD projects would be subject to future separate permit reviews and would be likely to occur as separate developments on separate properties than transit facilities. Therefore, no residential presence at light rail transit facilities is anticipated, for purposes of this SEPA evaluation.

It is anticipated that future light rail transit facilities reviewed for consistency with adopted codes will include a number of staff consistent with staffing levels serving existing light rail transit facilities in city limits.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. This non-project proposal will not have displacement impacts.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. No measures are proposed.

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

This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. No measures are proposed.

**m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any.**

This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. No measures are proposed.

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

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

This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction of any development. In general, future light rail transit facilities that would be subject to adopted codes are not anticipated to include housing units.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction or demolition of any development. Therefore, this non-project action would not result in any housing displacement. Future light rail transit facility designs that would be subject to adopted codes may impact existing housing on a case-by-case, site-specific basis. If a future light rail transit facility design reviewed for consistency with adopted codes proposes to eliminate existing housing, the project will be required to comply with all applicable federal, state, and local laws, regulations, and standards regarding impacts to housing.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

No measures are proposed. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. If a future light rail transit facility design reviewed for consistency with adopted codes proposes to eliminate existing housing, the project will be required to comply with all applicable federal, state, and local laws, regulations, and standards regarding measures to reduce or control housing impacts.

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

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

None to describe. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

None. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

No measures are proposed for this non-project action. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction.

Adopted Light Rail Transit Facilities Design Guidelines (see SDCI Director's Rule 2-2024) provide recommendations to designers and planners for integrating transit facilities into established local context, creating structures that reflect a diverse local history and culture, designing entrances that are generous and inviting, and incorporating greenery for aesthetic and cooling benefits. The guidelines encourage designers and planners to consult with local Tribes and Indigenous communities, reference local plans, and understand community objectives to ensure the proposed light rail transit facility is well suited to its neighborhood context.

In addition to use by project designers and planners, it is anticipated that the design guidelines will be referenced during permitting processes including review by the Seattle Design Commission, SDCI staff and other City of Seattle staff.

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

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

None to describe. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. It is expected that future light rail transit facilities reviewed for consistency with adopted codes will include exterior and interior pedestrian lighting in support of users' personal safety, which may be lit during day and night. All lighting will be required to comply with Street and Sidewalk Use Code (SMC Title 15), Building and Construction Code (SMC Title 22), Land Use Code (Title 23), and Environmental Protection and Historic Preservation (SMC Title 25), in addition to all other applicable laws, regulations, and standards.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

No. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. In future light rail transit facilities that would be subject adopted codes, lighting will be required to be shielded and directed away from adjacent uses.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

None to describe. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Ambient light and glare typical of urban areas within city



limits are not expected to affect future light rail transit facility proposals that would be subject to adopted codes.

See the response to Question D.5 later in this checklist regarding non-project proposal impacts.

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

None proposed. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. This non-project proposal will not result in light or glare impacts.

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

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

This non-project proposal does not correspond to a particular site or development and applies across the City. The City has a variety of designated and informal recreational opportunities. The City's designated park system is shown on the City's GIS layers.

This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. It is possible that future light rail transit facilities reviewed for consistency adopted codes may be located in proximity to designated and information recreational opportunities.

See the response to Questions D.4 and D.5 later in this checklist regarding non-project proposal impacts.

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

No. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. It is possible that future light rail transit facilities reviewed for consistency adopted codes may be located in or displace existing recreational uses. If transit facilities reviewed for consistency with adopted codes displace existing recreational uses they will be required to comply all applicable federal, state, and local laws, regulations, and standards.

See the response to Questions D.4 and D.5 later in this checklist regarding non-project proposal impacts.

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

None proposed. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facilities that would be subject to adopted codes may displace existing recreational uses, depending on their proposed location. If a future light rail transit facility reviewed for consistency with adopted codes proposes to impact Seattle Parks and Recreation (SPR) park property, SPR's approval will be required, and mitigation of the impacts may also be required under federal, state, and local laws.

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

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

None. This non-project proposal does not correspond to a particular site or development. There are eight historic districts and over 400 designated landmarks within the City of Seattle. Future light rail transit facilities reviewed for consistency with Light Rail Transit Facilities code amendments may be proposed within a historic district or adjacent to designated landmarks.

See the response to Questions D.4 and D.5 later in this checklist regarding non-project proposal impacts.

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

None. This non-project proposal does not correspond to a particular site or development. There are known landmarks, features, or other evidence of Indian or historic use of occupation throughout city limits. It is possible that a future light rail transit facility reviewed for consistency with Light Rail Transit Facilities code amendments may be proposed within or adjacent to an area where evidence of historic use or occupation is present. This non-project proposal will not result in any impacts to areas of historic use or occupation.

See the response to Questions D.4 and D.5 later in this checklist regarding non-project proposal impacts.

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

This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction; it is therefore not expected to result in any direct impacts to cultural or historic resources. It is anticipated that all future light rail transit facilities that will be reviewed under adopted codes will be evaluated under Section 106 of the National Historic Preservation Act of 1966, regardless of location. This evaluation is expected to include assessment by the Department of Archaeology and Historic Preservation (DAHP) and consultation with affected Tribes. If the proposed transit facility location reviewed for consistency with adopted codes is within or adjacent to a Historic or Landmark District or Building, the project must also be evaluated and approved by the Seattle Department of Neighborhoods and must comply with the Landmarks Preservation Ordinance (SMC 25.12).

See the response to Questions D.4 and D.5 later in this checklist regarding non-project proposal impacts.

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

None proposed. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. If the DAHP assessment and Tribal consultation described above determines a future light rail transit facility reviewed for consistency with adopted codes poses a risk of disturbance to resources, the project proponent will be required to create and follow a formal cultural resources approach approved by DAHP. This may include desk and field surveys to assess the resources, creation of an archaeological overview report, creation of and compliance with an archaeological monitoring plan to be implemented during any ground disturbing work, and a mitigation plan created in collaboration with any impacted Tribes.

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

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

This non-project proposal does not correspond to a particular site or development. In general, the anticipated extension of light rail systems would occur, at grade or above ground, in portions of the West Seattle Junction, Delridge, SODO, Elliott Avenue corridor, Interbay, and Ballard neighborhoods. Future light rail transit facilities that would be subject to adopted codes are generally expected to be planned in locations with robust existing public transportation infrastructure, including public roads and sidewalks.

See the response to Questions D.6 later in this checklist regarding non-project proposal impacts.

**b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

As a non-project action, the proposal does not correspond to a particular site. In general, public transit is available within the areas that would be served in the future by the Link light rail system extensions.

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

No. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facilities reviewed for consistency with adopted codes will be required to comply with SMC 25.53, which describes requirements for improvement of streets and alleys abutting a proposed private parcel development project.

See the response to Questions D.6 later in this checklist regarding non-project proposal impacts.

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

This non-project proposal does not correspond to a particular site or development. The future Link light rail system extensions are light rail projects that would expand the areas served by rail transportation across the city.

**e. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be**

**trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

This non-project proposal does not correspond to a particular site or development, and thus no project-based vehicle trips estimate can be made. In general, construction of new light rail transit facilities will expand the existing public transit network, which is expected to result in a decrease of vehicular trips.

See the response to Questions D.6 later in this checklist regarding non-project proposal impacts.

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

No. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. This non-project proposal is not expected to have any impact on the movement of agricultural and forest products on roads or streets in the area.

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

No measures are proposed for this non-project action. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facilities reviewed for consistency with Light Rail Transit Facility code amendments will broaden the existing light rail public transit network, which may in turn result in increases in bus service, bicycle lanes and associated infrastructure, accessibility improvements, larger sidewalks, and other multimodal transportation improvements.

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

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

No. This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. Future light rail transit facilities that would be subject to adopted codes are generally expected to require fire protection and police protection consistent with existing public transit infrastructure. In general, light rail transit facilities are sited in locations that will serve existing public services such as health care facilities, schools, and multimodal transportation options, so transit facilities that would be subject to this Director's Rule are not generally expected to result in an increased need for public services.

See the response to Questions D.6 later in this checklist regarding non-project proposal impacts.

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

None proposed. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. It is anticipated that this non-project proposal will not result in impacts to public services.

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

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

This non-project proposal does not correspond to a particular site or development. See the response to Questions D.6 later in this checklist regarding non-project proposal impacts.

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

This non-project proposal does not correspond to a particular site or development. This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. It is generally expected that future proposed light rail transit facilities that would be subject to adopted codes connect directly to existing public or private utility infrastructure for all utility needs. Light rail transit facilities may require utility relocations, which would be permitting by the respective utility agencies.

See the response to Questions D.6 later in this checklist regarding non-project proposal impacts.

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

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

X

**Type name of signee:** Click or tap here to enter text.

**Position and agency/organization:** Click or tap here to enter text.

**Date submitted:** Click or tap to enter a date.

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

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

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

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

### 1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

The SEPA review for this proposal analyzes the potential for the non-project actions in this code legislation to generate impacts upon the environment. These kinds of impacts would be indirect, in that they would be supposed to occur by the codes negatively causing differences in design or development outcomes that would lead to adverse or significant adverse environmental impacts. The analysis below evaluates and disclose whether such impact relationships due to this code legislation would be possible, and their likelihood of occurring. As a summary general conclusion for these topics, no significant adverse natural environmental impacts of these kinds are anticipated, as direct, indirect, or cumulative adverse impacts due to this non-project proposal. Also, see the response to Question #D.2 below for more discussion of related topics.

#### **Non-project proposal's relationship to water discharge impact topics**

- ***New development standards for light rail:***

The proposed development standards include details about landscaping, including meeting a 0.3 Green Factor requirement, street tree requirements, plus the possibility of a 5-foot horizontal depth of landscaping extending along certain edges of a site or structure where 4-foot tall walls or fences would be present. These requirements are similar to (or slightly greater than) the requirements for new non-rail structure development in the affected zones. Given this, plus the applicability of SMC Title 22 (Building and Construction Code, including Stormwater Code) Stormwater Code and typical drainage requirements at future light rail facilities, this analysis does not identify any potential for significant adverse stormwater drainage impacts due to this proposal.

- ***Seattle Design Commission as review body, and subjects of review:***

This part of the proposal would not generate an added degree of drainage-related natural environment impacts, because it would not affect City drainage requirements. However, future SDC reviews and application of City of Seattle Light Rail Design Guidelines (see SDCI Director's Rule 2-2024) would address environmental sustainability in design, which could indirectly lead to more-than-minimum design treatments involving landscaping and drainage features. If design with more-than-minimum environmentally sustainable features occurs, it would likely contribute to overall positive drainage impacts at light rail facilities.

- ***Type I permits and other streamlining of permit review contents:***

The proposal maintains code content and review of future temporary use permits and essential public facility permits for light rail facilities similar to what occurs under current code. This will continue to include compliance with grading and drainage codes and best management practices for all Type I permits and as specifically indicated in SMC 23.42.040.F. Given the lack of change in these applicable code requirements, this analysis identifies no potential for adverse drainage-related impacts.

- ***ECA exception permit requirement streamlining and flexibility:***

The code amendments related to the ECA exception permit requirements would clarify requirements for light rail facility ECA exception permits, to focus the required information and analysis on topics that are most relevant, and omit irrelevant analysis. At the same time, the proposal for ECA regulation amendments would preserve the environmentally protective effectiveness of the ECA regulations, including defining appropriate kinds and amounts of environmental impact mitigation.

This proposal would also give added flexibility for designing natural environment impact mitigation strategies in the Longfellow Creek vicinity that are physically more extensive than might otherwise be allowed; and also to have buffer widths that in some cases can be tailored to better respond to local site characteristics. The proposed flexibility would avoid a potential concern that the most beneficial mitigation solutions could not be approved because they are not the option that affects the least amount of area.

The proposed ability to tailor buffer widths for wetlands and riparian management areas would help avoid buffers being artificially extended across improved streets and unnecessarily burden other persons' properties without ecologically contributing value to the wetland and stream resources. In all or nearly cases, an improved street would not be likely to provide ecologically contributing value to wetland and stream resources or their functioning.

These adjustments are oriented to locations at and near wetlands and stream environments. Allowing for the provision of natural-environment impact-mitigating features and improvements that are more extensive would be expected to lead to better environmentally-benefitting ecological functions and values as outcomes.

With respect to their influence on the proposal's "water discharge impacts," the overall effect of this proposal would be to accommodate mitigation strategies in natural areas that will have the greatest positive outcomes in avoiding and reducing adverse water discharge impacts. And, the proposal would also streamline and focus the future ECA reviews to enable efficient reviews of ECA exception permits to occur, without the need for extraneous information. This efficiency would not lead to potential increases in water discharge impacts, or significant adverse water discharge impacts, because the City's applicable ECA requirements are sufficiently thorough and detailed to lead to outcomes with appropriate mitigation in or near ECAs.

All permits requiring an ECA Exception permit will also be required to comply with SMC Title 22 (Building and Construction Code, including Stormwater Code) Stormwater Code.

- ***Project-level Tree and Vegetation Management Plan:***

The proposed amendments allowing for a multi-site tree and vegetation management plan for a light rail system development would not likely generate significant adverse water discharge impacts on the natural or built environments. The proposal would efficiently reduce the repetitiveness of permit review processes relating to the communication of tree and vegetation impact findings and identification of mitigation. At the same time, it is unlikely to create an increased potential for adverse outcomes on the natural environment, because the relevance of other tree-protective regulations would remain similar or the same. This relates to maintaining the applicability of the City's existing regulations that govern affected areas, including those relating to shorelines, environmentally critical areas, trees in right-of-way, and public park spaces. Due to this, the probable range of physical outcomes that would occur in the environments affected by future light rail development would be similar with or without an implementation of this Tree and Vegetation Management Plan proposal. It is likely that overall outcomes would include the implementation of a range of tree impact mitigation strategies that would result in provision of sufficient amounts of trees as project-impact mitigation. Therefore, no potential for significant adverse tree- and vegetation-related impacts or water-discharge impacts as a result of this Tree and Vegetation Management Plan proposal is identified by this analysis.

All properties reviewed in a project level tree and vegetation management plan will also be required to comply with SMC Title 22 (Building and Construction Code, including Stormwater Code) Stormwater Code.

- ***Clarify no appeal on one-year noise variance check-in:***

The proposal would accommodate a continuation of an appeal to the Hearing Examiner at initial decision on a major public project construction noise variance (MPPCNV), but would clarify there is no subsequent appeal opportunity. This is a procedural clarification that would not incrementally affect the potential for future adverse impacts to occur to the natural environment, including in relation to water discharge impacts.

- ***Amend bicycle parking requirements and add micromobility parking requirements***

The physical effect indirectly related to this proposal would be the placement of new bicycle parking divided among outdoor locations and indoor locations, and demarcation of surface areas for shared micromobility device parking. These kinds of physical actions, and the difference that the proposed code amendments would make in numbers of bicycle parking resources, would not cause adverse physical changes to the environment that would generate any potential for adverse or significant adverse water-resource related impacts.

### **Non-project proposal's relationship to air emissions impact topics**

- ***New development standards for light rail:***

This part of the proposal would have no relevance to directly causing additional air emissions from future light rail developments. The discussion above in this checklist about air impacts supports a conclusion of minimal potential for new light rail development standards to generate



significant adverse air emissions impacts. Namely, the proposal would likely result in similar or potentially greater presence of green features at light rail developments than if existing codes were used. These green features would aid in achieving air-pollutant-limiting outcomes such as limiting dust generation and supporting other natural processes (like more CO<sub>2</sub> uptake) that contribute to better air quality in the urban environment.

- ***Seattle Design Commission as review body, and subjects of review:***

The response here is the same as discussed above in the responses about air emissions impacts and water discharge impacts. Significant adverse air emissions impacts are not anticipated. This proposal is largely procedural in nature but supports SDC reviews that could lead to improved provision of beneficial features as future project outcomes.

- ***Type I permits and other streamlining of permit review contents:***

The response here is the same as discussed above for water discharge impacts. The details of this part of the proposal have little or no potential to indirectly cause additional air emissions from future construction-related temporary uses. Significant adverse air emissions impacts are not anticipated.

- ***ECA exception permit requirement streamlining and flexibility:***

The response here is the same as discussed above for water discharge impacts. The details of this part of the proposal have no little or no potential to indirectly cause additional air emissions from future construction-related temporary uses. Rather, they would accommodate streamlining of ECA exception application materials and reviews, and accommodate future natural environment impact mitigation improvements to occur in ways that likely increase overall future natural environmental functions and values. Therefore, significant adverse air emissions impacts are not anticipated.

- ***Project-level Tree and Vegetation Management Plan:***

See the response above related to water discharge impacts. This proposal is not likely to cause differential impacts in tree-related outcomes, due to the continuing applicability of regulations addressing various types of areas like shorelines and environmentally critical areas. This would also lead to a lack or probable difference in environmental impact outcomes related to air pollutant emissions. Thus, this analysis identifies no significant adverse air emissions impacts.

- ***Clarify no appeal on one-year noise variance check-in:***

The proposal would accommodate a continuation of an appeal to the Hearing Examiner at initial decision on a MPPCNV, but would clarify there is no subsequent appeal opportunity. This is a procedural clarification that would not incrementally affect the potential for future adverse air pollutant emissions impacts to occur in the natural or built environment. The combination of guidance provided by applicable City of Seattle codes and the MPPCNV's terms would likely help avoid significant adverse generation of air emission impacts.

- ***Amend bicycle parking requirements and add micromobility parking requirements***

The physical effect indirectly related to this proposal would be the placement of new bicycle parking divided among outdoor locations and indoor locations, and demarcation of surface areas for shared micromobility device parking. These kinds of physical actions, and the difference that

the proposed code amendments would make in numbers of bicycle parking resources, would not cause adverse physical changes to the environment that would generate any potential for adverse or significant adverse air-quality-related impacts. This relates to the minimal net difference in physical disturbances with placement of bicycle parking resources. And, the provision of such bicycle parking would not in itself cause transportation-related impacts that might generate more air pollution. Instead, providing for sufficient, right-sized amounts of bicycle parking would likely sufficiently accommodate future bicyclists' needs and increase the likelihood that bicyclists could conveniently choose to use bicycles to reach light rail stations rather than automobile trips.

#### **Non-project proposal's relationship to toxic/hazardous impact topics**

- ***New development standards for light rail:***

This part of the proposal does not have particular relevance to causing additional use of toxic or hazardous substances. Rather, the standards address building sizing, façade treatments, accessibility, and other provision of functional features, and they do not include regulations that would differently lead to use of toxic or hazardous substances. No potential adverse impacts of this kind are identified.

- ***Seattle Design Commission as review body, and subjects of review:***

See the response above regarding new development standards for light rail. This part of the proposal also does not have particular relevance to causing additional use of toxic or hazardous substances.

- ***Type I permits and other streamlining of permit review contents:***

This part of the proposal would affect the type of permit decision made for essential public facilities and temporary uses for light rail construction, at which construction-related staging and other activities would occur. However, the proposal would not affect the requirements in Section 23.42.040.F that include environmentally protective measures, including those that might have an indirect relationship to use of toxic or hazardous substances. This means there would not be probable differences in the potential for adverse impacts of this kind to occur at sites with temporary uses.

- ***ECA exception permit requirement streamlining and flexibility:***

This part of the proposal does not have particular relevance to causing additional use of toxic or hazardous substances. Rather, the focus of these changes would relate to accommodating outcomes in restored natural environment areas that would be better for the natural environment than might be possible under current regulations. Also, a wide array of protective regulations and policies addressing ECAs would continue to apply (such as mitigation sequencing) such that outcomes with greater adverse impacts due to toxic or hazardous substance use are unlikely.

- ***Project-level Tree and Vegetation Management Plan:***

See the other responses above relating to a lack of probable adverse impacts related to use of toxic or hazardous substances. Those conclusions would similarly apply to this part of the proposal, which relates to providing a consolidated manner of presentation of tree and

vegetation management practices and impact mitigation, rather than on a permit-by-permit basis. This would not be anticipated to result in differential practices or outcomes that would result in significant adverse environmental impacts or increased use of toxic or hazardous substances.

- ***Clarify no appeal on one-year noise variance check-in:***

The proposal would accommodate a continued ability to appeal to the Hearing Examiner at initial decision on a MPPCNV, but would clarify there is no subsequent appeal opportunity. This is a procedural clarification that would not incrementally affect the potential for future adverse toxic/hazardous substance impacts to occur in the natural or built environment.

- ***Amend bicycle parking requirements and add micromobility parking requirements***

The physical effect indirectly related to this proposal would be the placement of new bicycle parking divided among outdoor locations and indoor locations, and demarcation of surface areas for shared micromobility device parking. These kinds of physical actions, which are outcomes of the proposed code amendments, would not likely generate added use of toxic or hazardous substances in the natural or built environment, or lead to adverse natural environmental impacts.

#### **Non-project proposal's relationship to noise impact topics**

- ***New development standards for light rail:***

This part of the proposal would have no particular relevance to directly or indirectly causing additional noise emissions impacts from future light rail developments. The development standards are minimum requirements meant to influence the aesthetics, appearance, relationships of structure facades to surroundings, landscaping, and functional qualities such as location and sufficiency of access features, and provision of bicycle parking. Setting these standards is not likely to lead to differential impacts related to generating more noise. As such, the analysis for this specific proposal identifies no potential for significant adverse noise impacts to occur.

- ***Seattle Design Commission as review body, and subjects of review:***

The response here is the same as discussed above in the responses about air emissions impacts and water discharge impacts. Significant adverse noise emissions impacts as an indirect result of future SDC reviews, as proposed, are not anticipated. This proposal is largely procedural in nature but supports SDC reviews that could result in beneficial features provided in future project designs.

- ***Type I permits and other streamlining of permit review contents:***

This proposal would not affect the temporary use review provisions that refer to noise control as part of the review criteria for obtaining this permit. The criteria would continue to point toward compliance with the requirements of Seattle Noise Control ordinance. Also see the response below regarding the proposed clarification about noise variance approval process. This analysis identifies no potential for significant adverse noise emissions impacts as a result of this proposal.

- ***ECA exception permit requirement streamlining and flexibility:***

The response here is the same as discussed above for air emissions impacts and water discharge impacts. The details of this part of the proposal have no relevance to directly causing additional noise emissions from future construction-related temporary uses. Rather, they would accommodate streamlining of ECA exception application materials and reviews, and accommodate future natural environment impact mitigation improvements to occur in a manner that would likely increase overall future natural environmental functions and values. Therefore, significant adverse noise-related impacts are not anticipated.

- ***Project-level Tree and Vegetation Management Plan:***

The proposed methods of formulating a tree and vegetation management plan for project segments of a light rail system development do not have a potential to generate significant adverse noise impacts on the natural or built environments. The proposal would reduce the repetitiveness of review processes relating to tree and vegetation impact findings and identification of mitigation. Efficiencies in permit-related documentation would be accomplished, while probable outcomes in terms of effects on the natural environment would remain similar or the same. No potential for significant adverse noise impacts is identified.

- ***Clarify no appeal on one-year noise variance check-in:***

The proposal would accommodate a continuation of an appeal to the Hearing Examiner at initial decision on a MPPCNV, but would clarify there is no subsequent appeal opportunity. This is a procedural clarification that would not incrementally affect the potential for future adverse impacts to occur in the natural or built environment. With respect to control of noise impacts during construction, the MPPCNV's terms would dictate what types of noise could occur during what time periods, according to the City's future review and decision-making of the MPPCNV's application. With or without a one-year appeal opportunity for this variance, the City would make decisions about the initial approval of the variance, its terms and conditions, and would continue to have the ability to enforce these variance details. It could continue to require adjustments in the terms of the variance, if needed to address observed situations during construction that are not compliant. Therefore, the proposal reviewed here would not have a meaningful added potential to generate significant adverse construction noise impacts.

- ***Amend bicycle parking requirements and add micromobility parking requirements***

The physical effect indirectly related to this proposal would be the placement of new bicycle parking divided among outdoor locations and indoor locations, and demarcation of surface areas for shared micromobility device parking. These kinds of physical actions, which are outcomes of the proposed code amendments, would not likely generate added noise in the natural or built environment, or lead to adverse natural environmental impacts. This conclusion applies to both construction and post-construction periods.

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

None proposed. In general, future light rail facilities are expected to connect to existing city storm, sewer, and solid waste utilities to manage runoff, sewage, and trash generated during public use of the facility. Future light rail transit facilities reviewed for consistency with adopted codes will expand existing public transit infrastructure and service. This is expected to result in a decrease in private

vehicle trips, which is expected to subsequently result in a decrease in hazardous material emissions to air and discharges to stormwater.

During construction of future light rail transit facilities reviewed for consistency with adopted codes, the project will be required to follow all applicable laws, regulations, and guidelines on containment and management of construction emissions to the air, water, and earth, and following the Seattle Noise Code requirements on limiting construction noise impacts.

It is generally expected that future proposed light rail transit facilities reviewed for consistency with adopted codes will be evaluated for risk of potential environmental impacts, and that any probable significant impacts will be addressed by an impact mitigation proposal if required by federal, state, or local regulatory bodies.

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

The SEPA review for this proposal analyzes the potential for the non-project actions in this code legislation to generate impacts upon the environment. These kinds of impacts would be indirect, in that they would be supposed to occur by the codes negatively causing differences in design or development outcomes that would lead to adverse or significant adverse environmental impacts. The analysis below evaluates and discloses whether such impact relationships due to this code legislation would be possible, and their likelihood of occurring. As a summary general conclusion for these topics, no significant adverse natural environmental impacts of these kinds are anticipated, as direct, indirect, or cumulative adverse impacts due to this non-project proposal.

See the West Seattle and Ballard Light Rail Extensions Draft EIS, and the West Seattle Link Extension Final EIS published by Sound Transit for more information about potential future project impacts of the light rail system extension. Those documents include analysis of plants, animals, fish and marine life of the light rail development that would be subject to future review and permitting under applicable codes. While not directly related to this non-project legislation, these documents discuss relevant environmental context, and findings about environmental impacts and mitigation strategies for locations such as Duwamish River, Pigeon Point and Longfellow Creek.

- ***New development standards for light rail:***

Also see the response to Question #D.1 above regarding potential water discharge impacts. The proposed development standards directly relate to affecting primarily the physical design of proposed structures and spaces at future light rail stations – its sizing, structural features, materials, layout, and provision of a variety of features at their sites. These include aesthetic features such as landscaping and functional features such as overhead weather protection and vehicle access improvements. These development standards would have only minor relevance to plant and animal environments, except for landscaping features that may provide for bird and small mammal use. Within Seattle’s urban setting where the future light rail facilities would occur, the relatively dense existing development patterns tend to limit the availability of natural plant, animal, and fish/marine life habitats. Therefore, the potential for significant adverse impacts to plants, animals, and marine life habitats related to this proposal is low.

- ***Seattle Design Commission as review body, and subjects of review:***

See the response above to “new development standards for light rail” in this response to Question #D.2. The proposed subjects of review for the SDC do not have meaningful potential to generate significant adverse impacts upon plants, animals, and fish/marine life habitats. The review subjects do include application of City of Seattle Light Rail Design Guidelines (see SDCI Director’s Rule 2-2024) would address environmental sustainability in design which accommodates future SDC discussions that could positively influence the provision of environmentally beneficial features at a variety of facilities, in future light rail development proposals. Therefore, this analysis identifies no significant adverse impacts, but identifies a potential for positive impacts to occur.

- ***Type I permits and other streamlining of permit review contents:***

This proposal does not amend the Land Use Code’s approach for reviewing impacts to plants, animals, fish, or marine life in each Essential Public Facilities site or temporary use permits for light rail construction. All permits will be required to comply with local, state and federal requirements. SMC 23.42.040.F continues to address and indicate the requirements for subjects including grading, drainage, noise, light, and best management practices for construction-related stormwater control technical requirements. The proposed amendment relating to decision type is procedural in nature, and would not in itself lead to additional potential for physical impacts to the natural or built environment to occur due to Essential Public Facility developments or future temporary use permits for light rail construction purposes that would be subject to Section 23.42.040.F. Therefore, this analysis identifies no significant adverse impacts to plants, animals, and fish/marine life habitats due to this proposal.

- ***ECA exception permit requirement streamlining and flexibility:***

See the response to Question #D.1 above related to water discharge impacts. There are two subjects of this proposal that could indirectly relate to changes in the natural environment:

1. *Allowing for the provision of natural-environment impact-mitigating features and improvements that are more geographically extensive than might otherwise be allowed by current regulations.* Response: Current regulations recommend or require favoring alternatives that affect the least amount of physical area in a critical area like a wetland and wetland buffer. However, because future light rail projects will inevitably involve disturbances in the Longfellow Creek vicinity, for example, restorations to add a greater geographic coverage of mitigation improvements to result in more ecological functions and values would be helpful to provide greater net overall benefits for plants and animals in the area. Under the proposal, the future light rail applicant would still need to provide documentation and analysis, and apply mitigation sequencing, to obtain permit approvals for specific restoration and mitigation projects.

2. *A proposed ability to tailor buffer widths for wetlands and riparian management areas that would help avoid critical area buffers from needing to be defined across improved streets.* Response: The presence of improved streets in all or nearly all cases means that the streets themselves do not have substantial ecological contributing values to the wetland and stream resources. The improved streets are physical interruptions, which mean that properties across such streets also do not provide contiguous, connected, or high-value contributions to ecological functions and values. Therefore, an ability to define critical area buffer edges at the closest edge of the improved street would not be likely lead to diminished ecological functions and values, but

rather be an accurate reflection of the perimeters of adjoining areas that should be defined as the buffers for environmentally critical area. Future permit reviews would need to verify if and how such flexibility would apply to specific locations. Given this, the proposed ability to tailor buffer widths by not including area in improved streets is not likely to lead to significant adverse indirect impacts on the environment.

- ***Project-level Tree and Vegetation Management Plan:***

See the response to Question #D.1 above related to water discharge impacts. This part of the proposal relates to providing a consolidated manner of presentation of tree and vegetation management practices and impact mitigation, rather than on a permit-by-permit basis. This relates to documentation and permit review efficiency. It would not be anticipated to result in differential practices or significant adverse plant/animal/fish/marine life impact outcomes, due to the continuing applicability of regulations addressing various types of areas like designated shoreline areas and environmentally critical areas. Support for this interpretation of impacts can be gained by illustrating the proposed code's description of its relationship to existing regulations and what it indicates about the intended protections.

Proposed SMC 23.42.040.F.5.a (regarding contents of a TVMP):

- 1) An inventory and map of all trees anticipated to be retained and removed during construction;*
  - 2) Documentation of proposed protection methods for retained trees;*
  - 3) Description of all proposed tree mitigation;*
  - 4) Best management practices to be used during construction;*
  - 5) Site restoration requirements that prioritize installation of woody vegetation wherever feasible ; and*
  - 6) Post-construction tree and vegetation management practices.*
- b. Trees retained during construction must be protected by approved methods consistent with ANSI A300.*
- c. Trees and vegetation in environmentally critical areas are subject to requirements of Chapter 25.09.*
- d. Trees and vegetation in shoreline environments are subject to Chapter 23.60A.*
- e. Trees in the right-of-way are subject to requirements of Title 15.*
- f. Trees on City property are subject to the requirements of applicable executive orders.*
- g. Except for trees in an environmentally critical area, a shoreline environment, or on City property, each tree removed shall be replaced by one or more new trees, the size and species of which shall be approved by the Director.*

All of the required contents of the TVMP would lead applicants to provide substantive protections and be subject to regulations that should pertain for each given type of area: right-of-way, private property, environmentally critical areas, shorelines, and City properties. Thus, outcomes related to future light rail facility construction should result in reasonable protections for trees and vegetation that minimize impacts and result in sufficient impact mitigation for future projects' impacts.

Also see the response to the ECA exception permit streamlining and flexibility topic above in this response to Question #D.2.

- ***Clarify no appeal on one-year noise variance check-in:***

The proposal would accommodate a continuation of an appeal to the Hearing Examiner at initial decision on a MPPCNV, but would clarify there is no subsequent appeal opportunity. This is a procedural clarification that would not incrementally affect the potential for future adverse impacts to occur in the natural or built environment. This analysis anticipates that future MPPCNV permit conditions would address noise mitigation for construction activities that would relate to the known periodic presence of heron in certain portions of the project's future route. These would need to be followed according to their terms and conditions, and this proposal that addresses a one-year appeal opportunity on an issued MPPCNV would not result in incremental differences in the potential for adverse noise impacts on wildlife to occur.

- ***Amend bicycle parking requirements and add micromobility parking requirements***

The physical effect indirectly related to this proposal would be the placement of new bicycle parking divided among outdoor locations and indoor locations, and demarcation of surface areas for shared micromobility device parking. These kinds of physical actions, which are outcomes of the proposed code amendments, would not likely generate significant adverse levels of additional water, air, noise, or toxic substance-related impacts in the natural or built environment. Therefore, there is no particular likelihood or potential for significant adverse impacts to plants, animals, fish or marine life due to this non-project code amendment proposal.

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

None proposed. If a future proposed light rail transit facility development proposal reviewed for consistency with adopted codes has potential to impact protected plants, animals, fish, or marine life, the project proposal must be evaluated and approved by all applicable resource agencies. Depending on the location and species impacted, this may include the U.S. Department of Fish and Wildlife, the Washington Department of Fish and Wildlife, the U.S. Army Corps of Engineers, SDCI, and SDOT Urban Forestry. These agencies will enforce applicable laws including the Endangered Species Act, the Marine Mammal Protection Act, and the Bald and Golden Eagle Protection Act, among others. Proposed impacts to protected plants, animals, fish, or marine life will generally be expected to follow mitigation sequencing (avoid, minimize, mitigate) and demonstrate that the project is creating the least possible impact.

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



- New development standards for light rail:***

This proposal has no particular potential to generate additional impacts with respect to consumption of energy or natural resources. Rather, future light rail development would continue to be subject to the range of applicable code requirements that pertain to energy systems and minimum building code requirements, which are becoming increasingly stringent with higher minimum performance requirements. These would help avoid the potential for significant adverse impacts of this kind to occur.
- Seattle Design Commission as review body, and subjects of review:***

This proposal has no particular potential to generate additional impacts with respect to consumption of energy or natural resources. Rather, future SDC review would be likely to aid in the provision of development features at future rail-related development that are environmentally sustainable in nature.
- Type I permits and other streamlining of permit review contents:***

This proposal has no particular potential to generate additional impacts with respect to consumption of energy or natural resources. The proposal does not reduce the range of factors reviewed for essential public facility or temporary use permits, as described in Section 23.42.040.F for light rail temporary uses. Rather, a possible outcome of the proposal would be to ensure construction occurs in a shorter and more predictable and efficient period of time. This would be likely to aid in achieving less overall energy consumption during future construction processes, and reductions in the worst-case total levels of spillover effects upon the surrounding environments and related depletion of natural resources.
- ECA exception permit requirement streamlining and flexibility:***

This proposal has no particular potential to generate additional impacts with respect to consumption of energy resources, because it addresses efficiencies and flexibility in future permit review procedures. Regarding depletion of natural resources, the proposal would provide increased flexibility to design natural-impact-mitigation features that are more extensive and likely to have more total amounts of ecological functions and values than might be achieved under existing codes. This means a net increase in total environmental value of mitigation that would be likely to restorative positive effects, which is the opposite of natural resource depletion impacts.
- Project-level Tree and Vegetation Management Plan:***

See the responses above to Question #D.1 related to water discharge impacts. This part of the proposal relates to providing a consolidated manner of presentation of tree and vegetation management practices and impact mitigation, rather than on a permit-by-permit basis. This would not be anticipated to result in differential practices or increased levels of adverse energy or natural resource impact outcomes, with respect to indirect and cumulative impact outcomes. The continuing applicability of tree and vegetation-related regulations addressing various types of areas like shorelines and environmentally critical areas would be a factor that helps to avoid or limit the potential severity of natural resource depletion. As would the future implementation of mitigation strategies that would be specifically related to mitigating tree and vegetation impacts of the future light rail construction projects.

- ***Clarify no appeal on one-year noise variance check-in:***

The proposal would accommodate a continuation of an appeal to the Hearing Examiner at initial decision on a MPPCNV, but would clarify there is no subsequent appeal opportunity. This is a procedural clarification that would not incrementally affect the potential for future adverse energy or natural resource impacts to occur.

- ***Amend bicycle parking requirements and add micromobility parking requirements***

The physical effect indirectly related to this proposal would be the placement of new bicycle parking divided among outdoor locations and indoor locations, and demarcation of surface areas for shared micromobility device parking. These kinds of physical actions, which are outcomes of the proposed code amendments, would not likely generate added energy use or consumption of natural resources. No inordinate consumption of energy or natural resources would occur due to bicycle parking. Rather, accommodating bicycle parking could contribute to greater use of bicycles to reach light rail stations rather than automobile trips, which could lead to slight, incremental reductions in consumption of energy for motorized vehicle travel. Therefore, this analysis identifies no potential for adverse or significant adverse environmental impacts of this kind due to the proposed non-project action.

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

None proposed. In general, light rail transit facilities are expected to connect to existing electrical utilities for power requirements and are not likely to result in any probable significant adverse impacts to energy or natural resources.

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

Please see the responses above to Questions D.1, D.2, and D.3 that address the low potential for differential adverse impacts to environmentally sensitive areas and resources as a result of this non-project proposal. Relationship to potential or designated historic and cultural resources is described below. In relation to the future light rail link extension projects, please see the West Seattle and Ballard Light Rail Extensions Draft EIS, and the West Seattle Link Extension Final EIS published by Sound Transit for more information about potential impacts related to historic and cultural resources.

- ***New development standards for light rail:***

Please see the responses above to Questions D.1, D.2, and D.3 that address the potential for differential adverse impacts to environmentally sensitive areas and resources, relating to this non-project proposal. These can be summarized as having little or no potential to generate significant adverse impacts on environmentally sensitive areas and resources in the natural environment. This includes with respect to potential impacts to public park lands, for which unavoidable impacts related to future light rail construction projects (such as at Pigeon Point land owned by City of Seattle) would be addressed through established City policies, regulations, and practices. Such impacts would be a consequence of the definition of the light rail system as being an essential public facility.

With respect to historic and cultural resources, a range of City of Seattle policies and provisions would continue to apply in relation to future light rail development projects. These include processes whereby impacts to historic resources can be evaluated and mitigated if necessary; and processes whereby the inadvertent discovery or disturbance of unknown cultural resources in future construction locations would be subject to State and City laws regarding procedures and evaluations that would be required to occur. The set of proposals evaluated in this environmental checklist would not generate any tangible differences in these processes or procedures, nor be likely to indirectly result in any potential significant adverse impacts to historic resources or cultural resources. With regard to potential impacts of future light rail development projects, additional analysis can be found in the West Seattle and Ballard Link Extensions Draft EIS, and the West Seattle Link Extension Final EIS.

- ***Seattle Design Commission as review body, and subjects of review:***  
See the response above within this response to Question #D.4.
- ***Type I permits and other streamlining of permit review contents:***  
See the response above within this response to Question #D.4.
- ***ECA exception permit requirement streamlining and flexibility:***  
See the response above within this response to Question #D.4.
- ***Project-level Tree and Vegetation Management Plan:***  
See the other responses above within this response to Question #D.4. Also, see the responses above related to water discharge impacts and plants/animals/fish/marine life impact outcomes. While areas including environmentally sensitive areas and parklands would be impacted by future light rail developments, the future use and vegetation-related outcomes in these kinds of affected areas would not be differentially affected in an adversely impacting manner by this TVMP proposal. Rather, future development proposals would be subject to permit reviews and determination of mitigation consistent with City policies and regulations, with or without this TVMP proposal. Also, see discussions above relating to ECA exception permit requirement streamlining and flexibility.
- ***Clarify no appeal on one-year noise variance check-in:***  
The proposal would accommodate a continuation of an appeal to the Hearing Examiner at initial decision on a MPPCNV, but would clarify there is no subsequent appeal opportunity. This is a procedural clarification that would not incrementally affect the potential for future adverse impacts to occur in these environmentally sensitive areas.
- ***Amend bicycle parking requirements and add micromobility parking requirements***  
The physical effect indirectly related to this proposal would be the placement of new bicycle parking divided among outdoor locations and indoor locations, and demarcation of surface areas for shared micromobility device parking. These kinds of physical actions, which are outcomes of the proposed code amendments, would not likely generate added impacts on the kinds of environmentally sensitive areas and resources identified in this question. There would be no potential for the placement of bicycle parking to adversely impact parks, habitat, or historic or

cultural resources, for example. This is an interpretation related to probable affected areas within the city of Seattle for known future light rail development projects.

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

None proposed. If a future light rail transit facility development proposal reviewed for consistency with adopted codes is proposed in an environmentally sensitive area such as a wetland, park, threatened or endangered species habitat, historic or cultural sites, or flood plain, the development proposal will require extensive review by federal, state, and local agencies for compliance with the Endangered Species Act, Marine Mammal Protection Act, Bald and Golden Eagle Protection Act, Seattle Shoreline Code, Section 106 of the National Historical Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and all other applicable federal, state, and local laws, regulations, and standards for protection of environmentally sensitive areas.

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

The SEPA review for this proposal analyzes the potential for the non-project actions in this code legislation to generate impacts upon the environment. These kinds of impacts would be indirect, in that they would be supposed to occur by the codes negatively causing differences in design or development outcomes that would lead to adverse or significant adverse environmental impacts. The analysis below evaluates and disclose whether such impact relationships due to this code legislation would be possible, and their likelihood of occurring. As a summary general conclusion for land use-related topics, no significant adverse natural environmental impacts of these kinds are anticipated, as direct, indirect, or cumulative adverse impacts due to this non-project proposal. This includes for topics including land use compatibility and conflicts, housing displacement, and aesthetic-related concerns such as effects on appearance of future development, and view-related impacts.

- ***New development standards for light rail:***

The proposed development standards include several types of minimum design and functional-related standards. These are oriented to ensuring that external design features such as façade characteristics, and functional features such as pedestrian and vehicle access improvements and landscaping and screening, are provided in ways that will be compatible with their surroundings. Due to the minimum defined standards, the proposal would have a potentially positive impact on compatibility and would help to avoid or minimize the potential for adverse or significant adverse impacts on their surrounding vicinity.

The proposed standards would not likely generate significant adverse impacts relating to housing displacement, because they address the design qualities of the light rail system facilities with the objective to provide for reasonable compatibility with their surroundings. This includes using the development standards in future permit reviews to inform design qualities that would continue to accommodate future development of housing in the immediate surroundings. This is also consistent with City policies that encourage dense future transit-oriented development with housing to occur in the immediate vicinity of future light rail stations.

A similar rationale also applies to the relationship to potential aesthetic-related impacts. Future light rail systems would in some places be elevated and likely generate visual changes in the environment that can be interpreted as adverse. But the proposed development standards and application of City of Seattle Light Rail Design Guidelines (see SDCI Director's Rule 2-2024) would support future permit review processes that mitigate, to the extent feasible, these visual changes resulting in light rail system designs that achieve reasonable compatibility with their surroundings. Therefore, the differential impacts of the proposed development standards would tend to promote positive land use compatibility and related visual and aesthetic impact outcomes; and their potential to generate significant adverse land use-related impacts would be low.

However, it should be noted that the proposed standards would accommodate future station development that could exceed existing zoned height limits at a given site. To the extent that heights of future light rail system elements will be designed with engineering constraints (such as limits on maximum slopes of rail guideways) that make exceedances of zoned height limits unavoidable in some places, this flexibility must be granted because the City cannot preclude the construction of this essential public facility.

- ***Seattle Design Commission as review body, and subjects of review:***

This proposed assigning of a review body for future light rail development proposals is an action that is largely procedural and administrative in nature. The proposed subjects of SDC review include several that address architectural and urban design quality and operational functionality of future rail facility developments through application of City of Seattle Light Rail Design Guidelines (see SDCI Director's Rule 2-2024). The SDC reviews would contribute to sufficient levels of evaluation about how these developments will relate to their neighborhood. This will likely lead to facility design enhancements, improved overall compatibility within their surroundings, better aesthetic and visual qualities, and better functionality and usability of features. Therefore, this action is likely to result in probable positive impacts with respect to the built environment. Significant adverse impacts related to land use and shoreline use are not expected.

- ***Type I permits and other streamlining of permit review contents:***

The proposal would change the decision type for essential public facility and temporary use permits related to future light rail construction, potentially positively influencing the issuance of 90+ permits by allowing them to be issued in a timely way and minimizing schedule risk by allowing permits to be appealed to Superior Court. While this proposal may appear to have only procedural effects, it would indirectly have positive physical impact implications. These would relate to allowing the light rail construction projects to proceed in a faster and more predictable timeframe. The physical effects of this code amendment are that they would enable the total length of time that permitting, construction and related construction staging activities would occur to be shorter, perhaps by years. For those who would be living or passing by such areas with adjacent temporary uses for construction, this would mean limiting or reducing the total time and amount of exposure to construction-related activities.

It should also be noted that the review requirements for obtaining temporary use permits for light rail developments, in section 23.42.40.F, would not be altered by the proposal. Such permit reviews would consider a range of potential impacts of the temporary uses just as they do today. This includes for topics of noise, grading, drainage, light/glare, parking and traffic, impact on local businesses, site design and functionality, weather resistance, vibration, and site restoration. Also, the City would be able to impose reasonable conditions on these permits. Therefore, this analysis identifies no potential for significant differential adverse land use-related impacts that would occur as a result of this non-project proposal.

- ***ECA exception permit requirement streamlining and flexibility:***

See the response to Question #D.1 about this proposal, regarding water discharge impacts. This proposal would not be likely to result in land use- or shoreline-use related adverse impacts, because its effects would support implementing environmental impact mitigation strategies that have optimal ecological functions and values, and would fit within their surroundings. These are likely supportive and positive land use-related outcomes. This proposal also includes accommodating tailoring of critical area buffer widths to exclude areas that do not support functions and values, like existing improved roadways. This would also avoid imposing critical area buffer requirements on properties (across roads) where light rail development would not occur, which could help avoid the risk of overly-restricting or discouraging future use and development opportunities on such properties.

- ***Project-level Tree and Vegetation Management Plan:***

See the responses above to topics in Question #D.1 and Question #D.4 in this checklist. This analysis does not identify any particular potential for differential land use or shoreline use impacts related to trees that would be significant adverse in magnitude. Or, potential for land uses or shoreline uses that would be incompatible with existing plans. Rather, this part of the proposal would aid in permitting efficiency by allowing for the description of tree impacts of a future light rail segment development, and a consolidated description of anticipated protective and impact mitigation strategies as they would be applied across numerous properties; while at the same time maintaining the relevance of other current regulations for tree and vegetation impacts for subareas including environmentally critical areas, shorelines, and rights-of-way.

- ***Clarify no appeal on one-year noise variance check-in:***

The proposal would accommodate a continuation of an appeal to the Hearing Examiner at initial decision on a MPPCNV, but would clarify there is no subsequent appeal opportunity. This is a procedural clarification that would not incrementally affect the potential for future adverse land use or shoreline use impacts to occur; and would not be likely to lead to additional increments of noise impacts in areas that would be affected by future construction activities. In any case, the City's authority would continue to allow for and accommodate City monitoring and response to identified noise issues by requiring adjustments to noise protection strategies, to the degree they are warranted.

- ***Amend bicycle parking requirements and add micromobility parking requirements***

This analysis does not identify any particular potential for differential land use or shoreline use impacts related to bicycle parking requirements that would be significant adverse in magnitude. The relevant requirements would influence the quality and amount of bicycle parking, which

would be incorporated into light rail facilities in exterior or interior locations. The bicycle parking minimum requirements would be sized to accommodate expected demand levels for bicyclists to park at light rail stations. They would include minimum details also relating to quality and diversity of bicycle and micromobility device parking to be provided. These regulated aspects would have little or no potential to result in adverse or significant adverse land use compatibility impacts, due to a low potential for direct or indirect impacts on their surrounding neighborhood context.

But, to the extent that such bicycle parking is provided and attracts bicycle users over the long-term, it would support multiple kinds of City land use and transportation policies. These relate to:

- Supporting transit-oriented development objectives to increase numbers of future residents living nearby to light rail stations; and
- Encouraging residents' use of sidewalks, bicycles, and shared micromobility devices with networks of improved bicycle routes to, and bicycle parking facilities at, light rail station that will reduce reliance on automobile-centric transportation modes.

### **Relationship of the proposal to plans and policies: Relevant goals and policies from the Comprehensive Plan**

The proposal's objectives and proposed amendments would align with a number of Comprehensive Plan goals and principles relevant to the provision of light rail transit facilities. These refer to supporting the development of integrated mass transit systems that have good connections to other travel modes, including bicycles, scooters, walking, and bus travel. The proposal adds, amends, and clarifies the City's codes to support these kinds of features as outcomes. And, the process of planning the code amendments in cooperation with Sound Transit is in the spirit of coordination with other agencies as indicated in the following goals and policies.

### **Transportation Element of the Comprehensive Plan**

**Goal TG 3** *Meet people's mobility needs by providing equitable access to, and encouraging use of, multiple transportation options.*

***Policy T3.1.*** *Develop and maintain high-quality, affordable, and connected bicycle, pedestrian, and transit facilities.*

***Policy T3.2.*** *Improve transportation options to and within the urban centers and urban villages, where most of Seattle's jobs and population growth will occur.*

***Policy T3.4.*** *Develop a citywide transit system that includes a variety of transit modes to meet passenger capacity needs with frequent, reliable, accessible, and safe service to a wide variety of destinations throughout the day and week.*

***Policy T3.9.*** *Expand light rail capacity and bus reliability in corridors where travel capacity is constrained, such as crossing the Lake Washington Ship Canal or the Duwamish River, or through the Center City.*

***Policy T3.10.*** *Provide high-quality pedestrian, bicycle, and bus transit access to high-capacity transit stations, in order to support transit ridership and reduce single-occupant vehicle trips.*

**Policy T3.14.** *Develop facilities and programs, such as bike sharing, that encourage short trips to be made by walking or biking.*

**Policy T3.16.** *Support and plan for innovation in transportation options and shared mobility, including car sharing, biking sharing, and transportation network companies, that can increase travel options, enhance mobility, and provide first- and last-mile connections for people.*

**Policy T.3.17.** *Implement new technologies that will enhance access to transportation and parking options.*

**Goal TG 7** *Engage with other agencies to ensure that regional projects and programs affecting Seattle are consistent with City plans, policies, and priorities.*

**Policy TG7.1.** *Coordinate with regional, state, and federal agencies; other local governments; and transit providers when planning and operating transportation facilities and services that reach beyond the city's borders.*

**Policy TG7.6.** *Work with regional transit agency partners to expand and optimize cross-jurisdictional regional light rail and bus transit service investments that function as a single, coordinated system to encourage more trips to, from, and within Seattle on transit.*

**Policy TG7.7.** *Work with regional transit agencies to encourage them to provide service that is consistent with this Plan's growth goals and strategy.*

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

None proposed. Future proposed light rail transit facilities that would be subject to adopted codes will be evaluated against approved uses in the Street and Sidewalk Code (SMC Title 15), the Building and Construction Code (SMC Title 22), and the Land Use Code (SMC Title 23) including the Shoreline Master Plan. Infrastructure supporting public transit is generally compatible with existing shoreline and land uses, including residential, commercial, and recreational uses.

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

**Transportation**

- ***New development standards for light rail:***

*Impact Discussion for minimum right-of-way improvement standards:*

For future light rail transit facilities, this proposal includes minimum required improvement levels in the right-of-way and related property frontages, including locations and treatments of access points, transit-related and pedestrian-related improvements and other qualities. This is warranted because existing right-of-way improvement requirements can vary from zone to zone, and light rail transit facilities are different than other development types that are anticipated in the zone-by-zone improvement requirements (often residential use buildings, for example).



The code is designed to fit the light rail transit facility use type and clarify if certain minimum improvements (or exceptions to existing code) do or do not apply. This will aid future permit reviewers because certain code regulations that would otherwise exempt a development from providing full improvements would not apply to light rail facility developments. This would increase the accuracy of future reviews and ensure that the public street improvements required for light rail transit facilities are designed to meet public needs at these facilities.

The proposal also has standards addressing street improvements outside of the right-of-way to accommodate situations where the existing public right-of-way width is not wide enough to accommodate desired traffic, pedestrian, and other facilities—such as a sufficient number of lanes and adequate width for sidewalks. The standards would also prescribe minimum requirements for elements like on-site streets, driveways, sidewalks and bicycle pathways. These standards would ensure that future light rail facilities would be properly designed to provide accessible, safe, and adequate levels of improvements for vehicles, pedestrians, and bicyclists.

This analysis does not identify any particular adverse transportation-related impacts for these elements of the proposal. Rather, positive transportation impacts could occur as an outcome.

#### *Impact Discussion for private access drive standards:*

This proposal also includes minimum required improvements for private access drives, meaning on-site streets and similar features that would not be public right-of-way. This includes details addressing lane widths, curbcut specifications, curb improvements, and pedestrian facilities. Light rail transit facilities include properties of various sizes and shapes, some of which will have street and sidewalk facilities on their properties, serving important vehicle and pedestrian circulation purposes. Defining minimum specifications for these features will ensure they perform with sufficient dimensions, capacity, safety, and features serving all users. Having specific minimum standards will also allow for more efficient reviews of materials submitted in future permit applications. This analysis does not identify any particular adverse transportation-related impacts for this part of the proposal.

#### *Impact Discussion for amendments to minimum bicycle parking requirements*

This proposal also includes amendments to minimum bicycle parking requirements for light rail facilities. The Land Use Code has an existing minimum requirement for bicycle parking at rail stations, last updated in 2018. However, it has never been applied to a specific light rail facility development and had already been flagged for review and possible updates. City staff worked with Sound Transit staff in the last few years to evaluate how the minimum requirement could be updated to more closely relate to probable levels of bicycle parking demand, based on factors like typology of rail stations, ridership levels, proportion of bicycle riders bringing bicycles with them onto trains, amount of riders transferring at stations, and prospective future bicycle parking needs based on Seattle's transportation functional plans. The proposal also includes a recommended minimum provision of space for micro-mobility devices that are a growing segment of transportation. These details reflect an intentional planning approach that tailors the minimum requirement according to local characteristics and needs. City staff discussed this approach with representatives of a national professional organization that addresses bicycle and pedestrian facilities, who endorsed a local, tailored planning approach.

The proposal defines a minimum bicycle parking requirement based on several of these factors. It defines station types as terminus, local, mid-center, and center types, of which terminus stations have a higher required minimum provision. There would also be a potential for an additional amount of required parking to be added later if future demands are shown to be fully using the minimum amount provided.

Compared to the anticipated ridership of the West Seattle and Ballard link extension's stations, the proposed minimum provision of 54 bicycle parking spaces (36 in long-term secure bicycle parking facilities, and 18 in short-term facilities (such as "staple" racks) would meet and exceed the projected demand for bicycle parking at opening day of rail operations. The demand estimate reflects a number of assumptions, which include an assumed 50 percent of bicycle riders at stations taking their bicycles on-board trains with them, a morning peak commuting demand estimate that reflects one-third of daily ridership, and the subtraction of rail ridership that would transfer to another train at a given station (such as SODO) who would never be reasonably assumed as users of bicycle parking at that station.

As part of the background analysis for this proposal, City and Sound Transit analyzed recent data as well as examples from other cities, which support a rationale for a minimum requirement that is lower than what would be required by the current minimum requirement in today's Land Use Code. The current minimum requirement does not account for factors influencing different levels of demand. Rather, it was a one-size-fits-all minimum. Based on analysis of its potential use, the minimum requirement is overly high compared to future projected demand for bicycle parking. For example, if applied to the currently planned stations and ridership levels, it would require multiple hundreds of bicycle parking spaces, even up to 600+ spaces at the Westlake station for example.

Based on a full consideration of analytic data, projected ridership, and several assumptions about station types, and a process of vetting conducted individually and jointly by the City of Seattle and Sound Transit, the proposed minimum bicycle parking requirement is evaluated to be likely sufficient to serve bicycle parking demands at stations along the West Seattle and Ballard link extension projects. The proposal also includes a contingency that would require more bicycle parking to be added if actual bicycle parking demand in future years would regularly exceed the amounts provided at individual stations. This would be based on future monitoring of actual parking levels over time at each station. When evaluated in its entirety, the proposed bicycle parking minimum requirement can be concluded as a sufficient and appropriately tailored minimum requirement and is unlikely to create significant adverse transportation-related impacts.

- ***Seattle Design Commission as review body, and subjects of review:***

This proposal assigns the SDC to review light rail development proposals with respect to transportation, pedestrian accessibility, sufficiency of circulation, wayfinding, and access legibility and application of City of Seattle Light Rail Design Guidelines (see SDCI Director's Rule 2-2024). This would likely also include review of the quality of vehicle circulation facilities on sites. The probable effect of SDC reviews of such topics would be to recommend improving these individual qualities of transportation features as well as the overall functionality of the transportation

features on-site and in immediate vicinities of light rail developments. These would result in probable positive transportation-related outcomes. No probable adverse transportation impacts are identified for this proposal.

- ***Type I permits and other streamlining of permit review contents:***

No probable adverse transportation impacts are identified for this proposal. Parking and traffic-related impacts for temporary use proposals would continue to be reviewed according to the requirements in Section 23.42.040.F and essential public facilities per SMC 23.80, and mitigation for identified impacts would continue to be possible as an outcome of such reviews.

- ***ECA exception permit requirement streamlining and flexibility:***

The details of this part of the proposal have no direct relationship to transportation-related impacts. Rather, the code amendments would accommodate streamlining of ECA exception application materials and reviews and accommodate future natural environment impact mitigation improvements to occur in ways that likely increase overall future natural environmental functions and values. These kinds of effects would not likely have a particular adverse bearing on the use of streets or traffic operations on them. Therefore, significant adverse transportation impacts are not anticipated.

- ***Project-level Tree and Vegetation Management Plan:***

This analysis does not identify any particular potential for adverse transportation impacts due to this TVMP proposal. The proposal would maintain treatment of trees in rights-of-way comparable to existing policies and regulations, meaning no particular physical differences in outcomes related to such trees are likely to occur. The TVMP would not impact the transportation networks or street operations.

- ***Clarify no appeal on one-year noise variance check-in:***

The proposal would accommodate a continuation of an appeal opportunity to the Hearing Examiner at initial decision on a MPPCNV, but would clarify there is no subsequent appeal opportunity. This is a procedural clarification that would not affect the potential for future adverse transportation-related impacts to occur.

- ***Amend bicycle parking requirements and add micromobility parking requirements***

See discussion earlier in this response.

## **Public Services and Utilities**

- ***New development standards for light rail:***

This proposal has details pertaining to adequacy of public lighting, safety and accessibility of public spaces and facilities, minimum vehicle access and circulation standards, and guidance about on-site solid waste facilities. These have direct or indirect relevance to public safety, sanitation, and sufficiently protecting these facilities in terms of public safety and fire protection. These elements would influence the review and approval of future light rail facilities, in ways that could indirectly relate to provision of future police, fire, recreation, and utility service at these sites. Due to their intent to set minimum standards to achieve sufficient qualities (which would

complement other code requirements addressing building codes and fire safety), the probable impacts on public service and utility provides would be positive in nature. This analysis identifies no probable significant adverse impacts from this proposal.

- ***Seattle Design Commission as review body, and subjects of review:***

Also see the responses to Questions #D.1 (water-discharge impacts) and #D.5 (land use) for additional information. The proposed subjects of review for the SDC include those responding to the quality, amenity value, aesthetics, functionality of public spaces, and utility matters including solid waste disposal, and sustainable design related to drainage control for example. Through the future SDC reviews of light rail development proposals and application of City of Seattle Light Rail Design Guidelines (see SDCI Director's Rule 2-2024), the SDC would have the chance to recommend changes seeking to lead to optimal beneficial qualities and treatments. This would be a kind of positive environmental impact that could occur due to this proposal. It could potentially affect public services including parks and public space qualities, and could have indirect benefits with respect to enabling these spaces to be safer.

SDC review could also recommend a variety of environmentally sustainable features such as those relating to landscaping and drainage control topics, which could support relevant policies of Seattle Public Utilities related to water use and stormwater controls. This analysis identifies no probable significant adverse impacts from this proposal but identifies a potential for positive impacts to occur.

- ***Type I permits and other streamlining of permit review contents:***

The proposal maintains code content and review of future essential public facilities and temporary use permits for light rail facilities that is essentially the same as today's codes, changing primarily the decision type from Type II to Type I. The decision type change is procedural in nature and has no probable effect on public services- or utilities-related environmental impact outcomes. Permit applicants must continue to show compliance with all applicable local, state, and federal laws including the local Street and Sidewalk Code (SMC Title 15), the Building and Construction Code (SMC Title 22), and the Land Use Code (SMC Title 23). It also would include the continued availability of public notice and comment opportunities, and the continued ability for including conditions of permit approval. Given the lack of substantive adverse change in these applicable code requirements, this analysis identifies no impacts on public services or utilities.

- ***ECA exception permit requirement streamlining and flexibility:***

This proposal provides for streamlining of application materials to be provided if a future applicant for light rail development seeks an ECA exception; accommodates flexibility in defining wetland and riparian management area buffer widths; and provides flexibility to accommodate larger impact mitigation improvements to achieve greater ecological functions and values outcomes.

In terms of public services impacts (such as police, fire, parks, and schools), this analysis identifies no potential for significant adverse impacts. Some parklands may be located in or contain environmentally critical area, and so the proposal might affect how parks authorities plan for

future improvements in such ECA areas. These might have a range of implications, but of the likely implications would favor maintaining effective protection of environmentally critical areas.

Similarly, wetland and riparian area ECAs have relevance to Seattle Public Utilities overall efforts in stormwater controls and management. To the extent that these areas could play a role in SPU's ongoing or future responsibilities, the ability to accomplish larger mitigation improvements with more ecological functions and values in areas affected by light rail development would likely generate overall beneficial effects on SPU's ability to fulfill its drainage systems' utility and environmental objectives. Therefore, this analysis identifies no probable significant adverse impacts from this proposal.

- ***Project-level Tree and Vegetation Management Plan:***

See the response to Questions #D.1 and #D.2 above related to water discharge and plants/animals/fish and marine life impacts. This part of the proposal relates to providing a consolidated manner of presentation of tree and vegetation management practices and impact mitigation, rather than on a permit-by-permit basis. This relates to documentation and permit review efficiency. It would not be anticipated to result in impacts to police, fire, or public school types of public services. The Plan approach would only slightly relate to public parklands subjects, in that it would describe the established policies that pertain to mitigating for parkland and tree losses in locations where the future light rail development would displace those resources. With respect to special areas of interest, generally, to Seattle Public Utilities, the proposed Plan approach would not affect the code requirements pertaining to vegetation and tree protection in shoreline areas, or Environmental Critical Areas, or in rights-of-way. But it would aid in discussing and packaging a mitigation approach for construction-related tree impacts of the future light rail development proposals. While the final outcomes could be of interest to Seattle Public Utilities as it plans for future utility system improvements, this analysis identifies no particular potential for significant adverse impacts to public utility systems or services as a result of the proposed Tree and Vegetation Management Plan approach.

- ***Clarify no appeal on one-year noise variance check-in:***

The proposal would accommodate a continuation of an appeal opportunity to the Hearing Examiner at initial decision on a MPPCNV but would clarify there is no subsequent appeal opportunity at a later date. This is a procedural clarification that would not incrementally affect the potential for future adverse public service or utility-related impacts to occur—to police, fire, school, parks, water, sewer, or other utilities.

- ***Amend bicycle parking requirements and add micromobility parking requirements***

The physical effect indirectly related to this proposal would be the placement of new bicycle parking divided among outdoor locations and indoor locations, and demarcation of surface areas for shared micromobility device parking. These kinds of physical actions, which are outcomes of the proposed code amendments, would not likely generate significant adverse levels of impacts upon public service provision or utilities in the built environment because it is unrelated to the provision of public services.

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

None proposed.

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

This non-project proposal provides code amendments for future light rail transit facilities within city limits and does not authorize construction. There are no anticipated conflicts with federal, state, and local laws, requirements, and standards for protection of the environment.