

## HISTORIC AND CULTURAL PRESERVATION

### *AFFECTED ENVIRONMENT*

#### HISTORIC PRESERVATION

##### Overview

The Livable South Downtown study area includes two designated historic districts in the Chinatown/International District and Pioneer Square neighborhoods (see Figure 3-21). These neighborhoods are important areas for Seattle's early history, providing distinctive settings for working, living, recreation and other community activities. Further descriptions of the neighborhoods' physical qualities are provided in the Land Use sections earlier in this chapter.

City policies protect the two historic neighborhoods through several means. Special Review Districts were established to provide oversight of physical development with the intention of preserving historic, social, cultural and economic features. National Register Historic District designations in both neighborhoods further underscore their historic and cultural importance and provide guidelines for development. In areas outside the Special Review Districts, regulatory processes such as designation of new landmarks, use of SEPA authority and the design review process are available to protect landmarks and address aesthetic character of new development.

See Appendix H for further discussion of the districts, their history, and new inventory of existing buildings in parts of the study area. See Appendix I for a list and map of Pioneer Square properties that contribute to the historic district.

##### Rationales for Preservation

The City's Land Use Code includes distinct justifications for the preservation of the Pioneer Square and Chinatown/I.D. in the description of the Special Review Districts for these neighborhoods (see SMC sections 23.66.100 and 23.66.302).

##### **Pioneer Square**

Pioneer Square's "Reasons for designating the Pioneer Square Preservation District" listed in section 23.66.100 include the following:

1. *Historic Significance. The Pioneer Square Preservation District is unique because it is the site of the beginning of the City of Seattle. The area also retains much of the original architecture and artifacts of its early history. The District has played a significant role in the development of Seattle, the Puget Sound region and the State of Washington. It was the first location of industry, business and homes in early Seattle and the focus of commerce and transportation for more than a half century.*
2. *Architectural Significance. As a collection of late nineteenth and early twentieth-century buildings of similar materials, construction techniques and architectural style, the District is unique, not only to the City but to the country as well. Most of the buildings within the District embody the distinctive characteristics of the Late Victorian style. Many buildings are the work of one architect, Elmer H. Fisher. For these and other reasons, the buildings combine to create an outstanding example of an area that is distinguishable in style, form, character and construction representative of its era.*

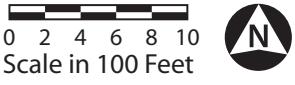
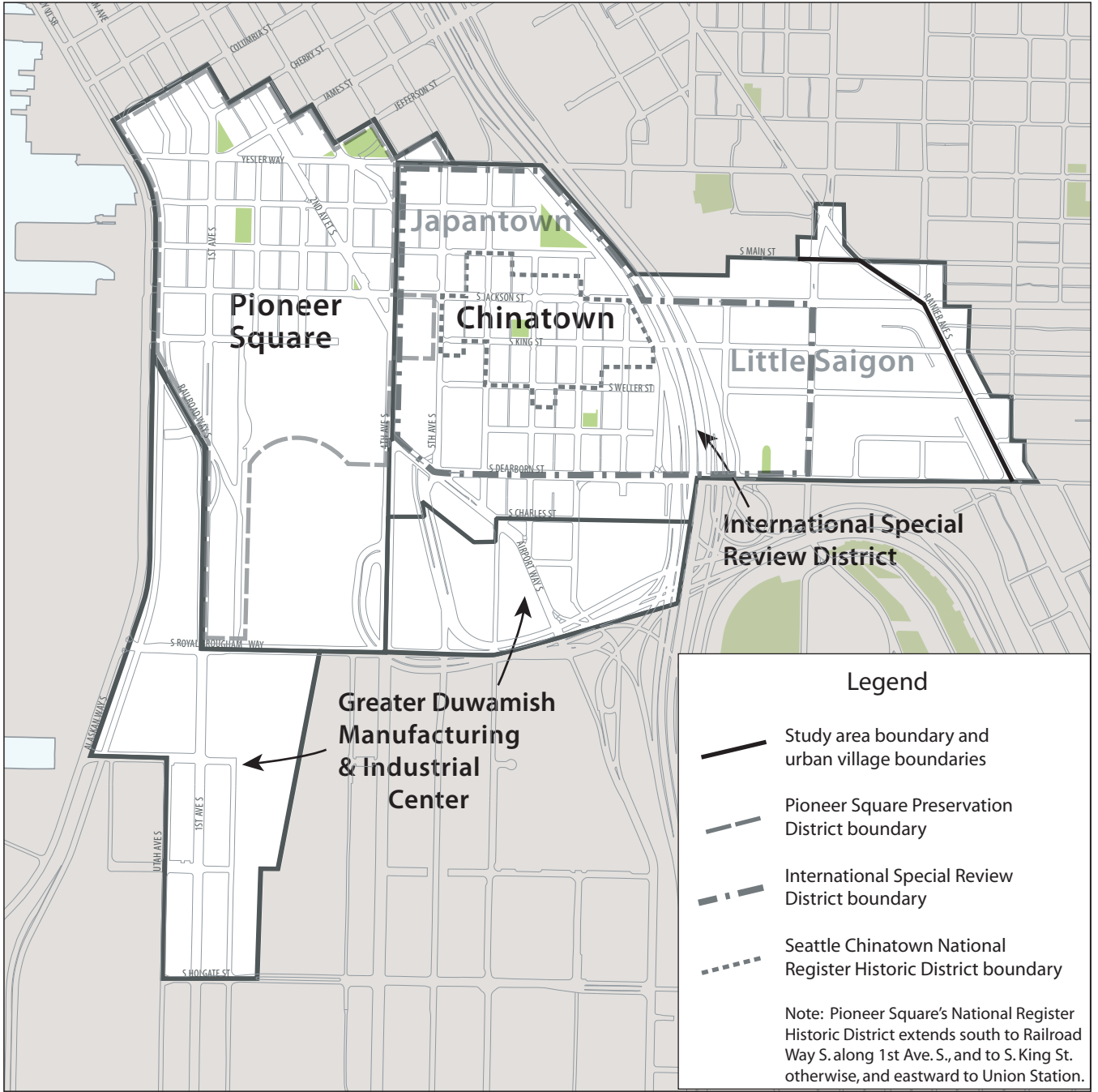


Figure 3-21

Preservation District & National Register  
Historic District Boundaries

Earlier in section 23.66.100, key purposes for the Preservation District include the following:

- *“preserve, protect and enhance the historic character of the Pioneer Square area and the buildings therein;*
- *Return unproductive structures to useful purposes;*
- *Encourage a variety of new and rehabilitated housing types for all income groups;*
- *Improve visual and urban relationships between existing and future buildings and structures, parking spaces and public improvements within the area; and*
- *Encourage pedestrian uses.*

Additional reasons for the Preservation District relate to social diversity, enhancing its business and economic environment, its geographic location, and the educational significance and value ascribed to preserving the unique environment of Pioneer Square.

### **International District**

Several goals and objectives are listed for the International Special Review District. Description in SMC 23.66.302 of the Land Use Code indicates that the International Special Review District is established *“to promote, preserve and perpetuate the cultural, economic, historic and otherwise beneficial qualities of the area, particularly the features derived from its Asian heritage, by:*

- A. *Re-establishing the District as a stable residential neighborhood with a mixture of housing types;*
- B. *Encouraging the use of street-level spaces for pedestrian-oriented retail specialty shops with colorful and interesting displays;*
- C. *Protecting the area and its periphery from the proliferation of parking lots and other automobile-oriented uses;*
- D. *Encouraging the rehabilitation of existing structures;*
- E. *Improving the visual and urban design relationships between existing and future buildings, parking garages, open spaces and public improvements within the International District;*
- F. *Exercising a reasonable degree of control over site development and the location of off-street parking and other automobile-oriented uses; and*
- G. *Discouraging traffic and parking resulting from Kingdome [now Qwest and Safeco Fields'] events and commuters working outside the District.*

In addition, the goals and objectives of the vicinity's primary zone, International District Mixed (IDM), indicate this zone shall *“recognize and promote the area's unique social mix and urban design character. This area is the core of the International District which exemplifies Asian culture. A wide range of uses, including street-level retail, housing development above street level, and the rehabilitation of existing buildings, shall be encouraged to provide a diversity of residential opportunities. Specific objectives include the following:*

- A. *To maintain and protect the International District core as an Asian cultural, retail and residential center;*
- B. *To allow flexibility and discretion in land use controls, regulations and guidelines to address present conditions and those which may develop in the future;*
- C. *To protect, preserve and promote small retail and commercial businesses;*
- D. *To encourage development of housing above street level;*
- E. *To encourage the rehabilitation of existing buildings; and*
- F. *To assure new development compatible in scale and character with existing buildings.*

**Special Review Districts and Boards**

The responsible agencies for these districts are the Special Review Boards for each neighborhood: the Pioneer Square Preservation Board and the International District Special Review Board. Board members review changes to the use and exterior appearance of buildings, streets, sidewalks and other public spaces in the district. When the Board has completed its review it makes recommendations to the Director of the Department of Neighborhoods, who is responsible for issuing Certificates of Approval. Neighborhood-specific zoning and Land Use Code regulations for these districts have been in place since at least 1985.

The Pioneer Square Preservation District encompasses all of the area zoned in Pioneer Square Mixed plus the Union Station property east of 4<sup>th</sup> Avenue S. The International Special Review District encompasses the area within the International District Mixed and International District Residential zones and also extends east of I-5 and south of S. Jackson Street to 12<sup>th</sup> Avenue S. (refer to Figure 3-21).

**National Register Historic Districts**

The National Park Service has designated much of Pioneer Square and part of the Chinatown/I.D. neighborhood as National Register Historic Districts, signifying their historic importance and educational value. The S. King Street and S. Jackson Street corridors west of I-5 are the center of the Chinatown/I.D. National Register Historic District, which also includes the area between S. Main Street and S. Weller Street and one property south of S. Weller Street (refer to Figure 3-21). This recognizes the largest cluster of buildings with significant historic and architectural value.

**New Analysis of Potential Landmark Resources in Portion of Study Area**

A consultant was engaged to conduct a survey and evaluation of those areas not previously surveyed for possible historic landmark structures (see Appendix H). This included portions of the Chinatown/I.D. neighborhood, south-of-Dearborn vicinity and part of the Stadium Area vicinity. The survey identified the following locations as those that “may” meet the landmark status, shown in Table 3-28 and Figure 3-22.

**Table 3-28  
Locations that “May Meet Seattle Landmark Designation Criteria”  
in the Livable South Downtown Study Area**

<b>Little Saigon and vicinity</b>	<b>South-of-Dearborn</b>	<b>Stadium Area</b>
A. Residential duplex, 500 12 <sup>th</sup> Avenue S.	E. NePage McKenney Co./ Pacific Fish Co./Wan Hua Foods, 804 6 <sup>th</sup> Avenue S.	I. WOSCA freight house, 801 1 <sup>st</sup> Avenue S.
B. Canton Noodle House, 504 12 <sup>th</sup> Avenue S.	F. Federal Immigration Services (former INS Bldg.), 815 Airport Way S.	J. National Grocery Co. Warehouse (Salvation Army Thrift Store), 1000 4 <sup>th</sup> Ave. S.
C. West Coast Printing, 622 Rainier Avenue S.	G. Romaine Electric Building/ Washington Iron Works, 1101 Airport Way S.	K. McKinnon Furniture Bldg., 1518 1 <sup>st</sup> Avenue S.
D. Nissei Veterans Committee Hall, 1212 S. King Street	H. Crescent Manuf. Co./RDA Bldg., 800 Maynard Avenue S.	L. Kellogg’s Warehouse/Wine Outlet Shop, 1701 1 <sup>st</sup> Ave. S.
		M. Industrial Rebuild Inc., 1712-1714 1 <sup>st</sup> Avenue S.
		N. Buckner-Weatherby Machinery Bldg., Guardian Security, 1743 1 <sup>st</sup> Avenue S.

Source: Beth Dodrill Consulting, 2007

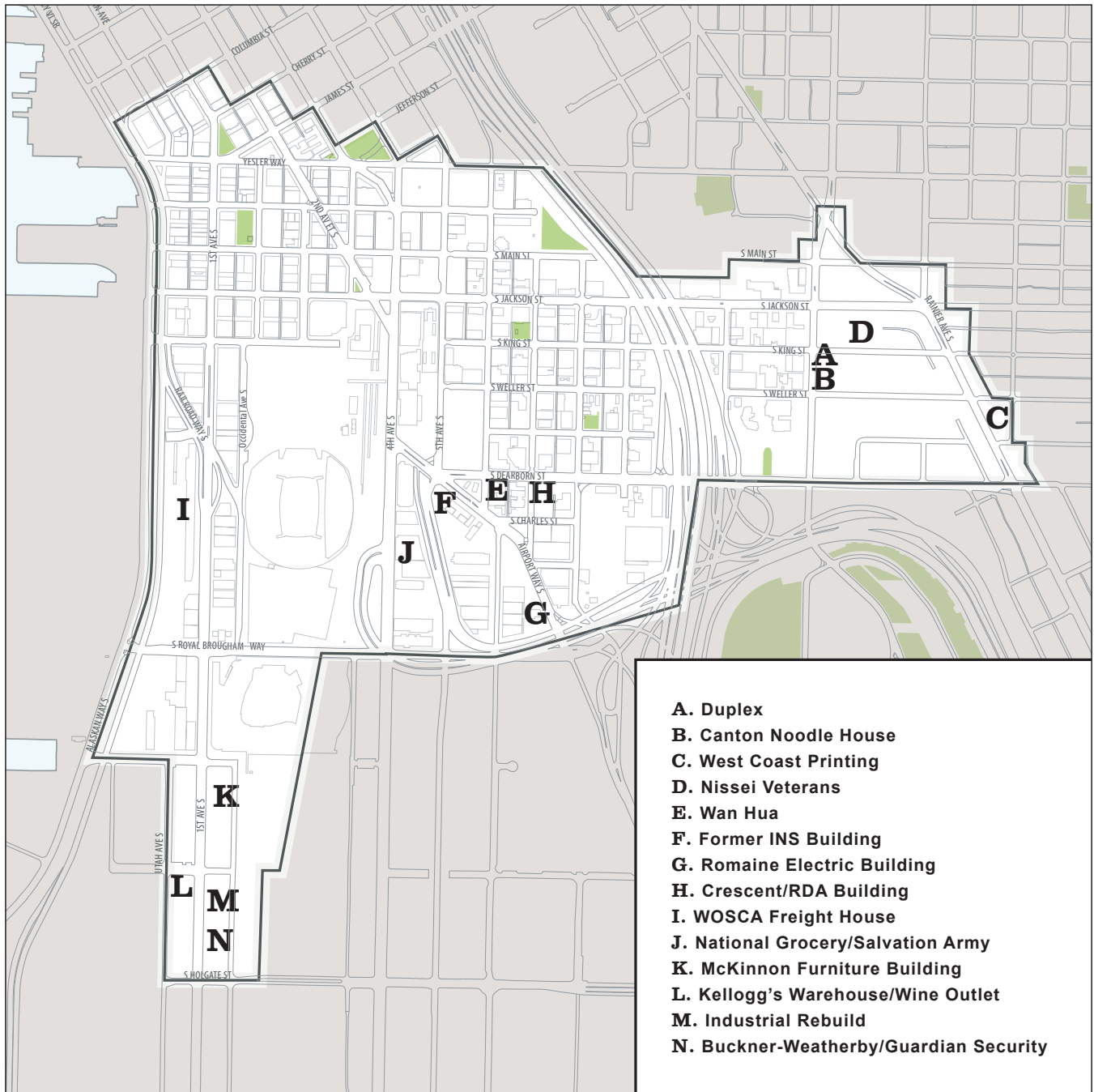


Figure 3-22

## Locations outside of National Register Historic Districts that “May Meet Landmark Designation Criteria”

The former INS building is already on the National Register of Historic Places, but has not been designated as a Seattle landmark. Similarly, the Japanese language school building at 1414 S. Weller Street, the Victorian Row Apartments at 1234 S. King Street, and the 12<sup>th</sup> Avenue S. bridge are also listed in the National Register.

The survey also examined structures in a few areas adjacent to and outside of the Livable South Downtown study area. Within these nearby areas, other surveyed buildings “may meet Seattle landmark designation criteria.” These include: the Seattle Buddhist Church school building at 1416 S. Jackson Street; Antioch Baptist Church at 1445 S. Main Street; the Bemis Building at 55 S. Atlantic Street; and the Budd & Co. Automotive building at 800 Rainier Avenue S.

See Appendix H for discussion of the historic context of the neighborhoods across the study area.

## **CULTURAL PRESERVATION**

The Pioneer Square and Chinatown/I.D. neighborhoods each contribute a distinctive character to Downtown Seattle. They are enjoyed by many Seattle residents, visitors, employees and businesspeople. But their value also has social and cultural dimensions. For some persons, these neighborhoods contain affordable housing, social networks, and supportive services like food banks and health care providers. The Chinatown/I.D. neighborhood in particular also is an environment that reflects and supports the cultural heritage and lifestyles for many members of the community. Public comments have articulated the importance of these neighborhoods as places to gather, socialize and conduct business, which helps many individuals get a foothold in the business world. These factors tend to provide a sense of belonging and a “place to call one’s own.”

## ***ENVIRONMENTAL IMPACTS***

### **HISTORIC PRESERVATION**

#### **Relationship to Livable South Downtown Planning**

Livable South Downtown planning has considered historic preservation in the neighborhoods within the study area. It has considered the extent to which specific types of actions might result in adverse impacts, directly or indirectly, on designated historic resources. This has influenced the development of zoning alternatives, the pursuit of strategies such as those relating to bonuses and transfer of development rights, and further research to assess whether as-yet undesignated landmark resources are present in the study area. The potential for impacts relates not only to the magnitude of change in zoned development capacity, but also to the geographic distribution of the historic resources. These are different for each of the neighborhoods studied, and vary by zoning alternative as well. Further, the rationales and objectives for the Special Review Districts for Pioneer Square and Chinatown/I.D. neighborhoods have a bearing on the interpretation of impacts.

#### **Impacts to Historic Resources**

##### **Pioneer Square**

The City’s policies emphasize the neighborhood’s historic and architectural significance—including its well-preserved neighborhood setting comprised of numerous buildings with high-quality and intact architectural detailing. The Land Use Code and Preservation Board review processes anticipate that new uses and changes in use of existing structures will occur over time, but require such uses to maintain a high degree of compatibility with the character of the neighborhood. Review processes over the years

have proven to be rigorous in maintaining standards of architectural and visual consistency. Similarly, land use rules have maintained the neighborhood’s character and mix of uses.

Future development would likely continue to be held to a high standard of architectural quality and compatibility with neighborhood character in order to receive approvals. Given the Preservation Boards’ track record and the limited extent of proposed changes, the probability is low for significant adverse impacts related to architectural, visual and urban design compatibility. At the same time, infill development would contribute to increasing continuity of street-level uses and the overall vitality and attractive aesthetic values of Pioneer Square.

### ***Relationship to height and scale impacts***

The alternatives generate the potential for impacts to the historic character of the districts by encouraging future development that could vary from the height and scale of historic structures in the Pioneer Square and Chinatown/I.D. historic districts. In the Pioneer Square core, the alternatives include options that could: raise height limits as high as 130 feet for non-historically-contributing properties (Alternative 1); could allow 130-foot infill development on non-historically-contributing properties but also define a mix of other subarea-specific height limits in the 85-120 foot range (Alternative 2); or could set a consistent height limit at 100 feet (Alternative 3). Of these, the increase to 130 feet for non-historically contributing properties in the Pioneer Square core would have the greatest potential for adverse impacts to historic resources, while lower height options would have lesser potential for adverse impacts related to building height.

At the west edge of 4<sup>th</sup> Avenue S., height limits of 180 feet at the “railroad gap” properties under Alternative 1 would generate probable significant adverse height-related impacts by introducing a scale of development that could be incompatible with adjacent historic structures. Under Alternative 2, height limits to 150 feet in that same vicinity would encourage a somewhat lower scale of development than Alternative 1, with a somewhat lesser potential for adverse impacts. See the Land Use—Height, Bulk, Scale and Compatibility section in this chapter and Appendix B.

Conclusions about historic preservation impacts are related to the identified potential for significant adverse height-related impacts at the “railroad gap” properties, because juxtapositions of new buildings at significantly taller heights could adversely affect the perception of the historic district’s ensemble of historic buildings. The Land Use—Height, Bulk, Scale and Compatibility section in this chapter proposes mitigation strategies to address these significant height-related impacts under Alternatives 1 and 2, which would also help mitigate historic preservation impacts as well.

### ***Potential effects on developability of historically-contributing properties***

Increases to height limits for historically-contributing properties in Pioneer Square, if they occurred, would increase the development potential of those properties because there is no density limit. Whether that potential could be realized depends on the effectiveness of regulations pertaining to development and demolition of Pioneer Square historic-contributing buildings. Land Use Code provisions and Historic District guidelines encourage preservation of existing historic buildings in Pioneer Square while discouraging demolition of those buildings. However, one concern is that intentional disinvestment in historic buildings could occur, to the point that buildings would deteriorate and demolition approval would finally be granted. Another concern is that property owners could sue, seeking a judgment that confirms an economic-hardship justification for demolition.

In both cases, increasing the development potential on historic-contributing properties can be interpreted as increasing the risks of these actions occurring. This could result in significant adverse impacts on the Pioneer Square historic district, if significant height increases affecting historically-contributing

properties are pursued. Alternative 2 includes increases to height limits on a small number of historic-contributing properties near 3<sup>rd</sup> Avenue S. However, due to the probable significance of this impact, this type of zoning change is not likely to be recommended for those properties. Rather, the recommended mitigation strategy in the Land Use—Height, Bulk, Scale and Compatibility section is to confine this potential Alternative 2 rezone only to the “railroad gap” properties abutting the west edge of 4<sup>th</sup> Avenue S.

### **Chinatown/Japantown**

The goals and objectives listed for this neighborhood’s Special Review District recognize that the neighborhood’s value lies not merely in its historic architectural and visual qualities but also in its value as a residential, social, cultural and economic activity center of Asian culture and heritage. This outlook influences the nature of regulations for the neighborhood. The well-defined boundaries of the National Register Historic District and an “Asian design character district” reflect the land use patterns of a concentrated historic core area that is adjacent to lower-density buildings with non-historic architectural design and parking lots. Accordingly, rules for development outside the “Asian design character district” are somewhat more flexible regarding compatibility with historic architecture than those within the character district (see SMC 23.66.336). These differences in relative sensitivity to historic character have a bearing on the interpretation of historic preservation impacts of the alternatives.

#### ***Relationship to height and scale impacts***

The Livable South Downtown planning process includes a strategy to avoid rezones within the National Register Historic District except one overlap with the Publix Hotel property as part of Alternative 2. This strategy limits the potential for adverse impacts to historic resources in the Chinatown/Japantown vicinity by avoiding zoning changes that would result in potentially higher property valuations and increased development capacity that could adversely affect existing historic buildings’ long-term use and existence.

Alternative 2 presents the greatest potential to directly alter the National Register Historic District. Alternative 2 would establish a 125-foot height limit in an IDM zone within the block bounded by 5<sup>th</sup> and 6<sup>th</sup> Avenues S., S. Weller Street to the south and S. King Street to the north. The Publix Hotel property on this block is part of the National Register Historic District, but other parts of the block are not. The block is located at the western end of the S. King Street corridor. This zone change would likely result in significant adverse impacts related to land use and height/bulk/scale elements of the environment, due in part to the sensitivity to historic character within and immediately adjacent to the National Register Historic District. Similarly, a conclusion is reached that significant adverse impacts on historic preservation could occur. This does not mean that height limits to 125 feet cannot be adopted for this block, but if so, mitigation strategies to further influence consistency of future development with historic character should be implemented.

Other potential adverse impacts to historic character could occur in other locations where proposed zoning changes are adjacent to but not within the existing National Register Historic District: near 5<sup>th</sup> Avenue S./S. Jackson Street, and along S. Weller Street, under Alternatives 1 and 2.

- Near 5<sup>th</sup> Avenue S./S. Jackson Street, the height/bulk/scale analysis suggests that an increase in allowable height to 240 feet (Alternative 1) would avoid significant adverse height, bulk and scale impacts on the adjacent Chinatown and Japantown vicinities, due to the positive influence of recommended bulk controls such as upper level setbacks and floor size limits. Increased allowable heights to 180 feet (for Alternatives 2 and 3) would have less potential to generate height, bulk and scale impacts than Alternative 1, also due in part to bulk controls included in these alternatives. Under these alternatives, the future development’s bulk and proximity to

adjacent historic-contributing structures is interpreted to represent an adverse historic preservation impact but not a significant adverse impact.

- Along S. Weller Street, the height/bulk/scale analysis suggests that only two or three quarter-block properties abutting the south side of S. Weller Street are likely to experience future development under the 125-foot zoning (Alternatives 1 and 2). This would limit the total exposure of the National Register Historic District north of S. Weller Street to the potential adverse impacts of taller building height, bulk and scale (see Figure 3-23). For all except one historic property that is south of S. Weller Street, the physical separation provided by the S. Weller Street right-of-way would represent a buffer to the historic district. Recommended bulk controls would also help moderate potential adverse impacts. Therefore, under Alternatives 1 and 2, proposed zones south of S. Weller Street are not expected to result in significant adverse impacts on historic resources. Alternative 3 does not include the 125-foot height limit proposal south of S. Weller Street, and so has no potential for adverse impacts.

#### ***Alteration of IDR-150' bulk limits would affect certain historically-contributing Japantown properties***

Currently, restrictive bulk limits in the 150-foot zone discourage a full-height building. As a result, recent development in this zone has been to heights up to 75 feet. Proposed changes to the IDR 150' zone's bulk limits would enable somewhat more flexible building forms that could increase the financial feasibility for buildings to be built to the maximum 150-foot height. The proposed changes would affect zoning on some National Register Historic District properties in the Japantown vicinity near 6<sup>th</sup> Avenue S. and S. Main Street, including the Panama Hotel, Northern Pacific (N-P) Hotel, Main Street School Annex and Russell Building.

In a worst case scenario, the changes to the IDR 150' zone could increase pressure for redevelopment of structures that comprise the core of the historic Japantown neighborhood. The Department of Neighborhoods and the International Special Review District Board would continue to ensure that these historic structures are protected. However, similar to Pioneer Square, intentional disinvestment or litigation could potentially lead to the eventual granting of demolition and/or development permits. Given the sensitivity of historic-contributing buildings within the National Register Historic District, this change has the potential to result in significant adverse impacts to historic resources.

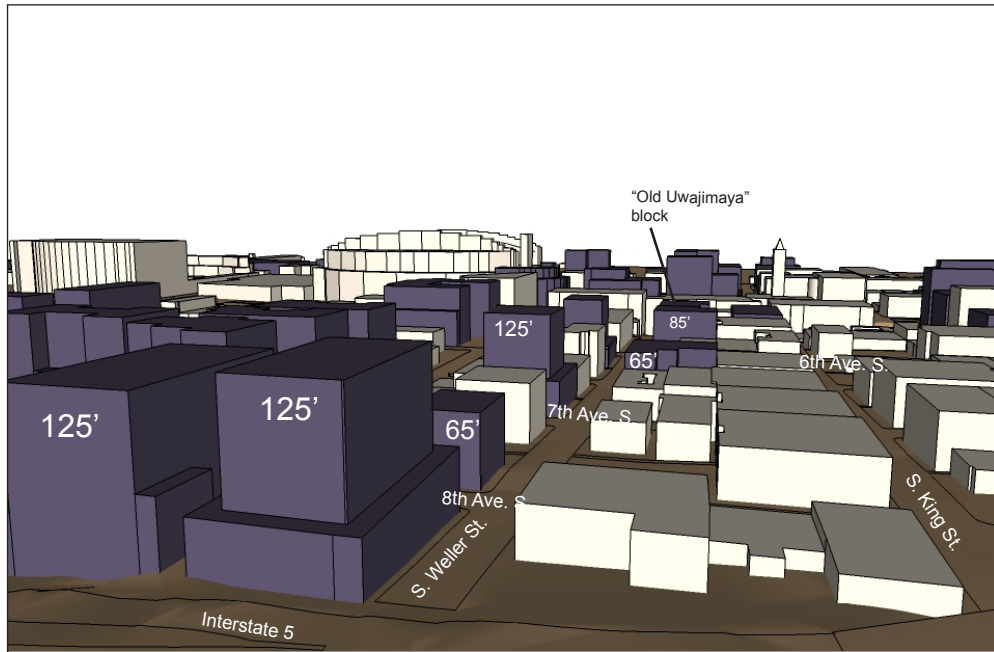
Proposed bonus and transfer of development rights (TDR) mechanisms are not likely to result in significant adverse impacts related to developability of historic structures (see the Housing section in this chapter for further discussion). Proposed bonus and TDR programs are likely to have positive long-term effects in securing the retention of structures in the National Register Historic District so long as they are oriented to maintaining and rehabilitating existing historic-contributing structures.

#### **Little Saigon (Chinatown/I.D.)**

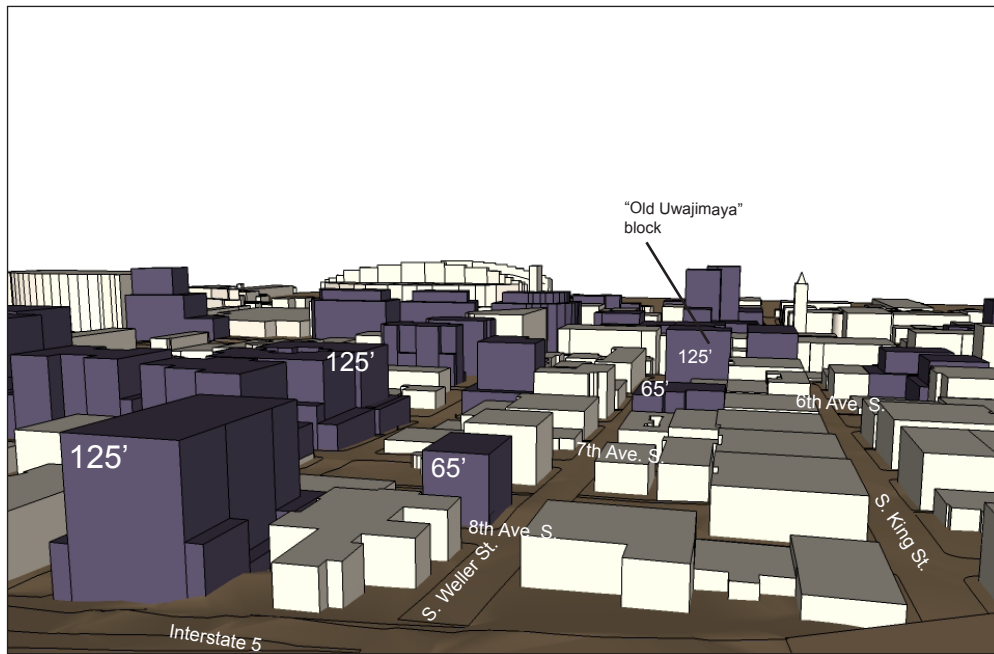
The Victorian Row Apartments is the only current landmark structure in this vicinity. It is owned by Historic Seattle, a non-profit entity that has a long-term agreement to retain the historic structure. Under Alternatives 1 and 3, the proposed NC3 85' zone would allow future development approximately 20 feet higher than current zoning. This modest increase in development capacity on this landmark property could potentially adversely affect the long-term retention of this historic resource. However, due to the relatively small increment of change, this would be considered only a minor adverse impact.

The 125-foot height proposed under Alternative 2 would further increase the potential for adverse impacts on the Victorian Row Apartments due to the greater increase in development capacity. However, as an existing landmark, it would be subject to further SEPA review and Landmark Board review if it was

### Alternative 1



### Alternative 2



Note: Hypothetical buildings shown, per the EIS growth scenario, except additional buildings shown on sites abutting S. Weller Street (Alt. 1) and on "old Uwajimaya" block (Alt. 2), for illustrative purposes.

**Figure 3-23**  
**View west from Interstate 5 at S. Weller St.**

proposed for demolition. Adjacent properties would also be subject to SEPA review to assess whether mitigation measures are needed to help new adjacent development complement this property. Protections afforded to designated landmark structures would help to reduce or avoid significant adverse impacts on this landmark.

### **Locations that “May Meet Landmark Designation Criteria”**

Sites listed in Table 3-28 that may meet criteria for landmark designation could be subject to future development. City policies indicate that existing structures that may qualify for landmark designation be referred to the City’s Department of Neighborhoods for an evaluation of their consistency with the landmark designation criteria. This would be expected to occur on a site-by-site basis if or when these properties are proposed for re-development. It is not known at this time which of the sites listed in Table 3-28 would meet landmark designation criteria. Because this process is already established in City policies, and because the potentially affected properties have now been inventoried, there is only a low risk that a potential landmark would be affected in a significant adverse manner by future development related to proposed Livable South Downtown zoning changes.

In addition, four buildings identified in Table 3-28 are located in the vicinity of 1<sup>st</sup> Avenue S. south of S. Atlantic Street where zoning changes are not likely to occur. These are the buildings labeled as “K, L, M and N” in Table 3-28. The only relevant Land Use Code change under consideration in that vicinity is, under Alternative 3, the possibility of lodging uses being authorized as an allowed use.

## **CULTURAL PRESERVATION**

### **Chinatown/I.D. neighborhood**

An important goal of Livable South Downtown planning relates to ensuring that the social and cultural qualities in the neighborhood can be maintained. This may include land use actions that help preserve physical characteristics of the neighborhood and that also maintain residential and business activity.

The EIS analyses cannot eliminate a worst-case possibility that displacement of individual uses or structures that contribute to cultural character might occur. Such trends might occur with or without zoning changes, due to long-term economic forces, turnover in business ownership, and physical decay of structures that form the historic core of the neighborhood. The Housing section of this chapter identifies the potential for displacement of affordable housing resources in parts of Japantown. The Business and Economic Impacts section identifies certain risks of impacts at varying levels in Little Saigon and the Chinatown core. However, due to lack of compelling evidence, no specific finding of a significant adverse impact related to cultural preservation is made in this EIS.

Livable South Downtown planning has identified possible strategies that would assist in helping to protect Asian American culture that is expressed through the physical and social environment of Chinatown/I.D. These include:

- Programs to generate funds for affordable housing to avoid displacement of existing low-income residents in the neighborhood;
- Programs to support the preservation and rehabilitation of historic buildings, many of which contain culturally significant design features;
- Technical assistance programs to encourage retention of existing businesses in Chinatown/I.D.
- Retention of existing height limits in core businesses areas in Chinatown/I.D. in order to avoid gentrification pressures in these areas.

Livable South Downtown planning also supports retention and updating of Special Review District rules and standards for future development, with continued attention to ensuring high levels of compatibility with the historic and cultural qualities of the district, particularly within the National Register Historic District. When possible, rules should also be adjusted to accommodate common business practices—such as use of sidewalks for vegetable display stands—that may not be consistent with existing street use regulations.

## ***MITIGATION STRATEGIES***

### **Pioneer Square**

#### **Alternative 1**

- If Alternative 1 zoning with 180-foot height limits is favored for the “railroad gap” properties at the west edge of 4<sup>th</sup> Avenue S., implement mitigation strategies recommended in the Land Use—Height, Bulk, Scale and Compatibility section to avoid significant adverse historic preservation impacts.

#### **Alternative 2**

- If Alternative 2 zoning with 150-foot height limits is favored for the “railroad gap” properties, implement mitigation strategies recommended in the Land Use—Height, Bulk, Scale and Compatibility section to avoid significant adverse historic preservation impacts.

### **Chinatown/I.D.**

#### **Alternative 2**

- See the mitigation strategy proposed in the Land Use—Height, Bulk, Scale and Compatibility chapter, with respect to height, bulk and scale impacts at the block bounded by 5<sup>th</sup> and 6<sup>th</sup> Avenues S. and S. King and S. Weller Streets.

#### **Alternatives 1, 2, 3**

- Consider whether a portion of the National Register Historic District near 6<sup>th</sup> Avenue S./S. Main Street should be subject to IDR 150’ zoning, which if amended in its bulk controls could increase these properties’ attractiveness for future redevelopment. Alternatively, these properties could be included in a lower-height zone to maintain protection against future development pressures.

### **Little Saigon**

#### **Alternative 2**

- Ensure that potential zone choices to a maximum height of 125 feet in Alternative 2 in Little Saigon would result in sufficient bulk controls to maintain compatible conditions with adjacent landmark structures, specifically in relation to the Victorian Row Apartments. Consider whether other measures are needed to further protect the long-term status of the Victorian Row Apartments if that property is included in rezones that increase development capacity.

## ***SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS***

With implementation of mitigation strategies to address the identified significant adverse historic preservation impacts of the alternatives, no significant unavoidable adverse impacts are expected to occur.