



City of Seattle

Gregory J. Nickels, Mayor
Department of Planning and Development
D. M. Sugimura, Director

**CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR OF
THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

Application Number: 3003312
Applicant Name: Andrew Novion for Restructure, LLC
Address of Proposal: 2520 SW Trenton Street

SUMMARY OF PROPOSED ACTION

Master Use Permit to establish use for future construction of three two (2)-unit townhouse structures and one three (3)-unit townhouse structure for a total of nine (9) units on an existing parcel of land. Parking for nine vehicles will be provided within the new structures.

The following approval is required:

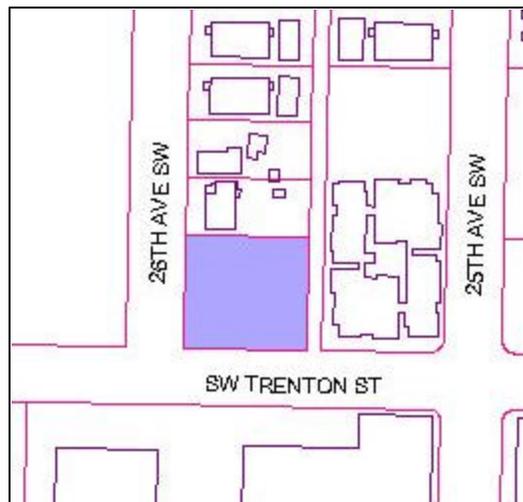
SEPA – Environmental Determination- Chapter 23.05 Seattle Municipal Code

- SEPA DETERMINATION:** Exempt DNS MDNS EIS
 DNS with conditions
 DNS involving non-exempt grading or demolition or involving another agency with jurisdiction

BACKGROUND DATA

Site & Area Description

The development site is nearly square in shape, (119 feet x 128 feet) occupying a total land area of approximately 15,359 square feet, in the Westwood Neighborhood in West Seattle. The subject site is a corner lot with street frontages on two rights-of-ways; Southwest Trenton Street to the south, and 26th Avenue Southwest to the west in a Multifamily Lowrise One (L1) zone, with a minimum lot area



requirement of one unit per 1,600 square feet. The site is currently undeveloped and heavily vegetated, owned by Restructure, LLC. The development site is also located within the Westwood Highland Park Residential Urban Village. The site was mapped as an Environmental Critical Areas (ECA) Wetlands by DPD, after review of Wetland Delineation Report DPD determined that no wetlands were present at the development site. (See SEPA analysis for additional comments.)

The site gently slopes downward from its northwest corner to the southeast corner, approximately eight feet over a distance of 170 feet. There are no discernable characteristics associated at the development site other than the density of existing vegetation. It is anticipated that the primary access to the development site will be from SW Trenton Street, a fully developed street with curbs, sidewalk, etc. SW Trenton Street is a primary arterial that serves as a main corridor connecting the east and west sides of West Seattle. Fronting the subject property along its west property line is 26th Avenue South, a partially improved right-of-way with soft shoulders and twenty foot wide roadway surface. The site also abuts an unimproved alley to the east and accessed from SW Trenton Street. Vehicle access to the development site is limited by a T-intersection; 26th Avenue terminates south of SW Trenton Street.

Zoning in the area is predominately residential north of SW Trenton. Included in this area is the denser Multifamily Lowrise Three zone, (L3) with a minimum density limit of one unit per 800 square feet of lot area, located immediately to the east of the subject lot across the alley. Surrounding the modest sized Lowrise zoned areas is an expansive, less intensive, Single Family 7200 zone (SF 7200). Modest residential structures dominate the SF 7200 area, located across 26th Avenue is Seattle Public Schools Denny Middle School sports field.

A large area south of SW Trenton Street is dedicated to commercial use within a Commercial One with a height limit of 40 feet (C1-40), and Neighborhood Commercial Three with a height limit of 40 feet (NC3-40) zones. Westwood Village Shopping Village dominates this area. Surrounding the shopping village are residential zones similar in scale to that found on the north side of SW Trenton Street. The surrounding structures in the residential area are a mix of multifamily and single family structures, modest one and two-story residential structures, built around the early to mid 1900's. The streetscape is open and airy due to the limited number of mature trees in the area and width of the right-of-way. Grass is the predominate feature in the planting strips located within the right-of-way on either side of the street.

Proposal

The owner proposes construct of three two (2)-unit townhouse structures and one three (3)-unit townhouse structure on an underdeveloped lot. The three-story buildings will be arranged with a front and rear orientation along the east/west axis. Two of the two (2)-unit townhouse structures will have direct frontage along 26th Avenue SW with a fourteen foot separation between each structure. A twenty-22 foot wide parking court will separate the front structures from the duplex and triplex townhouse structures in the rear. Pedestrian access will be accessed from 26th Avenue SW and SW Trenton Street. Parking for each residential unit will be provided within a garage in the proposed units and will be access through an alley abutting SW Trenton Street. The applicant is proposing to improve the alley to accommodate vehicular access extending from

the development site to Southwest Trenton Street to the south. Future activity include applying for a unit lot subdivision that would create nine (9) separate unit lots for each dwelling units on one parent lot (or development site).

Public Comment:

Date of Notice of Application:	September 22, 2005
Date End of Comment Period:	October 5, 2005
# Letters	0
Issues:	No comment letters were received by DPD, during the public comment, and up to the time of decision.

ANALYSIS - SEPA

The initial disclosure of the potential impacts from this project was made in the environmental checklist submitted by the applicant (dated August 26, 2005) and annotated by the Land Use Planner. The information in the checklist, the supplemental information submitted by the applicant and the experience of the lead agency with the review of similar projects form the basis for this analysis and decision.

The SEPA Overview Policy (SMC 25.05.665) clarifies the relationship between codes, policies and environmental review. Specific policies for each element of the environment, certain neighborhood plans, and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority.

The Overview Policy states, in part, “Where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation” subject to some limitations. Under such limitations/circumstances (SMC 25.05.665) mitigation can be considered.

Short-term Impacts

Construction activities could result in the following adverse impacts: construction dust and storm water runoff, erosion, emissions from construction machinery and vehicles, increased particulate levels, increased noise levels, occasional disruption of adjacent vehicular and pedestrian traffic, and a small increase in traffic and parking impacts due to construction workers’ vehicles. Existing City codes and ordinances applicable to the project such as: The Noise Ordinance, the Stormwater Grading and Drainage Control Code, the Street Use Ordinance, and the Building Code, would mitigate several construction-related impacts. Following is an analysis of the air, water quality, streets, parking, and construction-related noise impacts as well as mitigation.

The Street Use Ordinance includes regulations that mitigate dust, mud, and circulation. Temporary closure of sidewalks and/or traffic lane(s) would be adequately controlled with a street use permit through the Transportation Department, and no further SEPA conditioning would be needed.

Construction of the project is proposed to last for several months. Parking utilization along streets in the vicinity is moderate and the demand for parking by construction workers during construction is not anticipated to reduce the supply of parking in the vicinity. Parking demand for construction personal can be accommodated at the development site and any spillover can be managed within the SW Trenton Street or 26th Avenue SW rights-of-way. Therefore, no further mitigation will be required.

The development site is located adjacent to a residential area where construction of this scale would impact the noise levels. The SEPA Noise Policy (Section 25.05.675B SMC) lists mitigation measures for construction noise impacts. It is the department's conclusion that limiting hours of construction beyond the requirements of the Noise Ordinance is necessary to mitigate impacts that would result from the proposal on surrounding properties, because existing City ordinances do not adequately mitigate such impacts. This is due to the density of residential units in the area and the proximity of these structures to the subject site. The proposal is, therefore, conditioned to limit construction activity to non-holiday weekday hours between 7:30 A.M. and 6:00 P.M. After the structure is enclosed, interior construction may be done in compliance with the noise ordinance. The department may modify this condition to allow work of an emergency nature or which cannot otherwise be accomplished during these hours by prior written approval of the Land Use Planner.

Construction is expected to temporarily add particulates to the air and will result in a slight increase in auto-generated air contaminants from construction worker vehicles; however, this increase is not anticipated to be significant. Federal auto emission controls are the primary means of mitigating air quality impacts from motor vehicles as stated in the Air Quality Policy (Section 25.05.675 SMC). No unusual circumstances exist, which warrant additional mitigation, per the SEPA Overview Policy.

There are no short term impacts identified with the creation of (unit lot) short subdivisions. Short term impacts are associated with the construction of the structures and have been analyzed and discussed with no further conditioning is warranted.

Long-term Impacts

Long-term or use-related impacts are also anticipated from the proposal: increased surface water runoff from greater site coverage by impervious surfaces; increased bulk and scale on the site; increased demand on public services and utilities; increased light and glare; loss of vegetation; and increased energy consumption. These long-term impacts are not considered significant because the impacts are minor in scope.

The long-term impacts are typical of multifamily structures and will in part be mitigated by the City's adopted codes and/or ordinances. Specifically these are: Stormwater, Grading and Drainage Control Code (stormwater runoff from additional site coverage by impervious surface); Land Use Code (height; setbacks; parking); and the Seattle Energy Code (long-term energy consumption). Additional land use impacts which may result in the long-term are discussed below.

Earth

The development site contained a mapped Environmental Critical Areas Wetland (Section 25.09.020.C SMC), which prompted the applicant to submit a Wetland Delineation Report, due to the presence of a Wetlands area located at the development site's southeast corner. The site plan depicted two proposed structures sited in this area. A Wetland Delineation Report was prepared by The Riley Group, Inc. containing an assessment and conclusions concerning the proposed townhouse development.

The Wetland Delineation Report determined that the site consisted of a second-growth forest consisting of a mixture of native and non-native species that are not in-keeping with hydrologic characteristics associated with wetlands. A small depression in the southeast corner of the development site was found during site reconnaissance that contained some wetland characteristics. After hydrologic monitoring was completed, it was determined though some characteristics were present wetland hydrology was not observed. The report set forth methodology, findings, and conclusions in the report dated April 7, 2006. After evaluation of the report and site visit by DPD, DPD concurred with the report's findings and concluded on May 25, 2006 that no regulatory Wetlands were present at the development site. At the time plans are submitted for this work they will be reviewed by the DPD Geotechnical Engineer and Building Plans Examiner who will make any additional requirements as necessary prior to issuance of the grading and building permits. Therefore, no conditioning for grading activities in the steep slope area is warranted pursuant to SEPA policies.

Height, Bulk, and Scale

The design of each of the four buildings (containing a total of nine units) is smaller in footprint and proportion that would otherwise be allowed by Code. The new buildings will be arranged near the four corners at the development site, with a setback of fifteen (15) feet from the west property line and nineteen (19) feet from the east to reduce the appearance of bulk along the SW Trenton Street perspective. The impact of bulk is further reduced on surrounding properties by the spatial arrangement of the structures and location of open spaces at the outer edges. The net impact will be in scale to the existing residential stock in the immediate area, and minimal impact upon pedestrian activity along the sidewalk.. To the south, across SW Trenton Street, Westwood Village Shopping Center dominates the visual field within the vicinity of the development site. To the east, across the alley an apartment complex located in the L3 zone, is the second most visually dominate development in the immediate area. A large play field is located to the west, across 26th Avenue. The addition of four (4) three-story ground related structures containing a total of nine (9) units on the block are in scale and is anticipated to pose no adverse impacts.

As viewed from the 26th Avenue SW orientation, the proposed three-story structures will have minimal impact. The structures will be sited approximately 15 feet away from the 26th Avenue SW frontage. The area between the proposed structures and property line will be landscaped to further obscure visual impacts at the property's edges. This alone has achieved a reduction of its visual presence to the street system. Each of the proposed buildings will have a pitched roof, double-hung windows with trim, and will be modulated. These design elements break up the appearance of bulk of the facades and will mitigate the height, bulk, and scale impacts of the structures. Therefore, no additional height, bulk, or scale SEPA mitigation is warranted pursuant to the SEPA height, bulk and scale policy.

Traffic and Transportation

The Institute of Transportation Engineers (ITE) Trip Generation Manual (7th Edition) estimates that Townhouse units generate approximately 5.9 vehicle trips per day. The availability and proximity of transit to downtown and south end employment centers will make it likely that there will be fewer vehicle trips than from developments in outlying areas on which the ITE generation equation is based. The site has ready access to Metro bus stops and to Delridge Way Southwest to the east and 35th Avenue Southwest to the west with connections to State Highway 99 and Interstate Five (I-5). The amount of traffic expected to be generated by the proposed project is within the capacity of the streets in the immediate area, so no SEPA mitigation of traffic impacts is warranted.

Parking

The parking policy in Section 25.05.675M of the Seattle SEPA Ordinance states that parking impact mitigation may be required only where on-street parking is at capacity as defined by the Seattle Transportation Department or where the development itself would cause on-street parking to reach capacity. Parking utilization in the vicinity appears to be below capacity and on-street parking can be found during the daytime or evening hours. Nine (9) off-street parking spaces will be provided at the development site, one within each new unit for a parking ratio of 1 space per unit, which meets code requirements and is expected to accommodate parking demand generated by the 9 dwelling units most of the day. Vehicle access to the development site is taken from the abutting alley which opens up on-street front fronting the development site. On-street parking capacity in the surrounding area is sufficient to meet any additional spill-over parking which may exist. Therefore, no mitigation of parking impacts is necessary pursuant to SEPA.

There are no long term impacts identified with the creation of (unit lot) short subdivisions. Long term impacts have been analyzed and discussed above with no further conditioning warranted.

CONCLUSION - SEPA

In conclusion, several adverse effects on the environment are anticipated resulting from the proposal, which are non-significant. The conditions imposed below are intended to mitigate specific impacts identified in the foregoing analysis, or to control impacts not regulated by codes or ordinances, per adopted City policies.

DECISION - SEPA

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

- [X] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030(2)(C).
- [] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment with respect to transportation, circulation, and parking. An

EIS limited in scope to this specific area of the environment was therefore required under RCW 43.21C.030(2)(C).

SEPA CONDITIONS

The owner(s) and/or responsible party(s) shall:

During Construction

The following condition(s) to be enforced during construction shall be posted at the site in a location on the property line that is visible and accessible to the public and to construction personnel from the street right-of-way. If more than one street abuts the site, conditions shall be posted at each street. The conditions will be affixed to placards prepared by DPD. The placards will be issued along with the building permit set of plans. The placards shall be laminated with clear plastic or other weatherproofing material and shall remain in place for the duration of construction.

1. In order to further mitigate the noise impacts during construction, the owner(s) and/or responsible party(s) shall limit the hours of construction to non-holiday weekdays between 7:30 AM and 6:00 PM and Saturdays between 9:00 AM and 6:00 PM. This condition may be modified by the Department to permit work of an emergency nature of to allow low noise exterior work (e.g., installation of landscaping) after approval from the Land Use Planner. After the structures are enclosed, interior work may proceed at any time in compliance with the Noise Ordinance. The department may modify this condition to allow work which cannot otherwise be accomplished during these hours by prior written approval of the Land Use Planner.

Signature: (signature on file) Date: September 14, 2006
Bradley Wilburn, Land Use Planner
Department of Planning and Development
Land Use Services