



City of Seattle

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

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

**Application Number:** 3004566  
3004567

**Applicant Name:** Ned Nelson for Lithia Motors

**Address of Proposal:** 1002 Airport Way South  
666 South Plummer Street

**SUMMARY OF PROPOSED ACTION**

Land Use Application (3004566) to allow a two-story 51,856 square foot building for automotive sales. Parking for 46 vehicles will be located at grade. Project includes demolition of two warehouse structures which total 38,348 sq. ft. Auto service to be reviewed under #3004567 (Lithia Motors).

Land Use Application (3004567) to allow four-story structure with 47,255 sq. ft. for auto service and 93,944 sq. ft. for auto warehouse and 51,210 square feet of roof top auto storage will be provided. Parking for 124 vehicles to be provided on site. Review includes demolition of a 61,362 sq. ft. warehouse. Auto sales to be reviewed under #3004566 (Lithia Motors).

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

\* The Notice of Early DNS for both projects was published on November 30, 2006.

## **BACKGROUND DATA**

### **Site & Area Description**

The subject sites are both full blocks are located across the South Plummer Street right-of-way. Both are bounded by 7th Avenue South to the east. The northern block is rectangular in shape, approximately 61,266 square feet, and is bordered by South Charles Street to the north and Maynard Street South to the west. The southern block is irregularly shaped and encompasses a land area of approximately 89,180 square feet. The unimproved South Norman Street and I-90 Express Ramp right-of-way are located to the south of the site. Both sites are zoned General Industrial 2 (IG2 U-85). To the north, across South Charles Street, the zoning changes to Commercial 2 (C2-85).

Existing warehouse buildings are located on both sites. Both sites are relatively flat. The abutting Plummer Street right-of-way between the two sites is not fully improved, nor is South Norman Street. The remaining abutting right-of-ways are fully improved with curbs, sidewalk, gutters, etc.

### **Proposal**

Development of the north block includes the construction of a structure containing 47,255 square feet of auto service in the first two levels, 39,464 square feet of accessory parking (approx. 108 vehicles) on the second level, 93,944 square feet of auto warehouse use on the levels three and four and 51,210 square feet of roof top auto storage. Parking for 16 vehicles will be provided on a surface parking lot. Project also includes demolition of an existing one-story, 61,362 square foot warehouse building (Project 3004567).

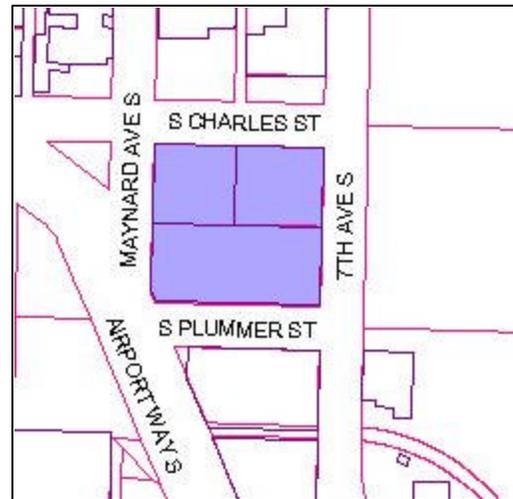
Development of the south block includes the construction of a two-story structure containing 52,000 square feet of auto sales and 19 stalls of accessory parking located in a surface parking lot and 27 stalls to be provided within the structure (for a total of 46 stalls). (Project 3004566).

Vehicle access for both projects to be provided from South Plummer Street. Additional access to the north site will be provided from Maynard Avenue South.

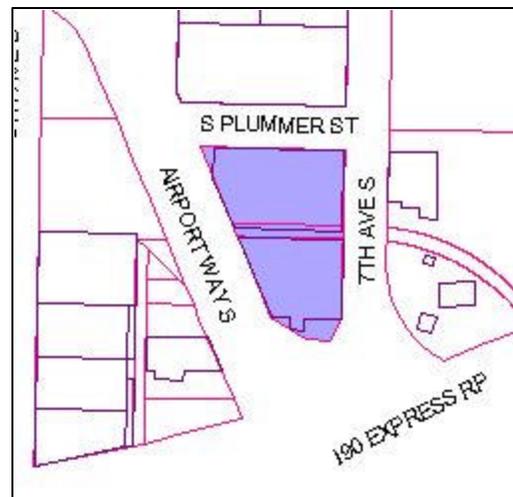
### **Public Comment:**

The DPD comment period for both projects ended on December 13, 2006. No comments were received.

**666 South Plummer Street (3004567)**



**1002 Airport Way South (3004566)**



## **ANALYSIS - SEPA**

The initial disclosure of the potential impacts from this project was made in the environmental checklists submitted by the applicants (dated November 1, 2006) 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. Thus, a more detailed discussion of some of the impacts is appropriate.

### **Short-term Impacts**

The following temporary or construction-related impacts are expected: decreased air quality due to suspended particulates from construction activities and hydrocarbon emissions from construction vehicles and equipment; increased dust caused by drying mud tracked onto streets during construction activities; increased traffic and demand for parking from construction materials hauling, equipment and personnel; increased noise; and consumption of renewable and non-renewable resources. Several adopted codes and/or ordinances provide mitigation for some of the identified impacts:

- The applicant estimates approximately 15,000 cubic yards of excavation for construction of the auto service and storage facility (3004567) and 10,000 cubic yards of excavation for construction of the auto sales facility (3004566). Excess material to be disposed of must be deposited in an approved site.
- The Stormwater, Grading and Drainage Control Code regulates site excavation for foundation purposes and requires that soil erosion control techniques be initiated for the duration of construction.
- The Street Use Ordinance requires watering streets to suppress dust, on-site washing of truck tires, removal of debris, and regulates obstruction of the pedestrian right-of-way.
- Puget Sound Clean Air Agency regulations require control of fugitive dust to protect air quality. The Building Code provides for construction measures in general.
- Finally, the Noise Ordinance regulates the time and amount of construction noise that is permitted in the city.

Compliance with these applicable codes and ordinances will reduce or eliminate most short-term impacts to the environment. However, given the amount of building activity to be undertaken in association with the proposed project, additional analysis of air quality, grading, noise and traffic impacts is warranted and summarized below:

| <b>Environmental Element</b> | <b>Discussion of Impact</b>  |
|------------------------------|--|
| 1. Drainage/Earth            | <ul style="list-style-type: none"><li>• 25,000 cubic yards of grading and excavated materials.</li></ul>                         |
| 2. Traffic                   | <ul style="list-style-type: none"><li>• Increased vehicular traffic adjacent to the site due to construction vehicles.</li></ul> |
| 3. Air Quality               | <ul style="list-style-type: none"><li>• Increased particles released.</li></ul>  |

Drainage

Soil disturbing activities during site excavation for foundation purposes could result in erosion and transport of sediment. The Stormwater, Grading and Drainage Control Code provides for extensive review and conditioning of the project prior to issuance of building permits. Therefore, no further conditioning is warranted pursuant to SEPA policies.

Earth/Grading

The Stormwater, Grading and Drainage Control Code requires preparation of a soils report to evaluate the site conditions and provide recommendations for safe construction on sites where grading will involve cuts or fills of greater than three feet in height or grading greater than 100 cubic yards of material. The current proposal involves excavation of approximately 25,000 cubic yards of material. The Stormwater, Grading and Drainage Control Code provides extensive conditioning authority and prescriptive construction methodology to assure safe construction techniques are used, therefore, no additional conditioning is warranted pursuant to SEPA policies.

The construction plans will be reviewed by DPD. Any additional information showing conformance with applicable ordinances and codes will be required prior to issuance of building permits. Applicable codes and ordinances provide extensive conditioning authority and prescriptive construction methodology to assure safe construction techniques are used; therefore, no additional conditioning is warranted pursuant to SEPA policies.

Construction: Traffic

The SEPA Overview Policy (SMC 25.05.665) and the SEPA Construction Impacts Policy (SMC 25.05.675B) allow the reviewing agency to mitigate impacts associated with construction activities.

Construction activities are expected to affect the surrounding area. Impacts to traffic and roads are expected from truck trips during excavation and construction activities. The SEPA Overview Policy (SMC 25.05.665) and the SEPA Construction Impacts Policy (SMC 25.05.675B) allows the reviewing agency to mitigate impacts associated with transportation during construction. The construction activities will require the removal of material from site and can be expected to generate truck trips to and from the site. In addition, delivery of concrete and other materials to the site will generate truck trips. As a result of these truck trips, an adverse impact to existing traffic will be introduced to the surrounding street system, which is unmitigated by existing codes and regulations.

It is expected that most of the demolished materials will be removed from the site prior to construction. During demolition a single-loaded truck will hold approximately 10 cubic yards of material. This would require approximately 2,500 single-loaded truckloads to remove the 25,000 cubic yards of material to remove the excavated materials and for the construction of the auto sales facility and auto service and warehouse facility.

Existing City code (SMC 11.62) requires truck activities to use arterial streets to the greatest extent possible. This immediate area is subject to traffic congestion during the p.m. peak hour, and large construction trucks would further exacerbate the flow of traffic. Pursuant to SMC 25.05.675(B) (Construction Impacts Policy) and SMC 25.05.675(R) (Traffic and Transportation), additional mitigation is warranted.

1. For the duration of the construction activity, the applicant/responsible party shall cause construction truck trips to cease during the hours between 4:00 p.m. and 6:00 p.m. on weekdays.

This condition will assure that construction truck trips do not interfere with daily p.m. peak traffic in the vicinity. As conditioned, this impact is sufficiently mitigated in conjunction with enforcement of the provisions of existing City Code (SMC 11.62).

For the removal and disposal of the spoil materials, the Code (SMC 11.74) provides that material hauled in trucks not be spilled during transport. The City requires that a minimum of one foot of “freeboard” (area from level of material to the top of the truck container) be provided in loaded uncovered trucks which minimize the amount of spilled material and dust from the truck bed en route to or from a site.

The Street Use Ordinance requires sweeping or watering streets to suppress dust, on-site washing of truck tires, removal of debris, and regulates obstruction of the pedestrian right-of-way. This ordinance provides adequate mitigation for transportation impacts; therefore, no additional conditioning is warranted pursuant to SEPA policies.

### Air Quality

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.

### Long-term Impacts

Long-term or use-related impacts are also anticipated from the proposal: increased bulk and scale on the site; increased demand on public services and utilities; increased light and glare; 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.

### Traffic and Transportation

A traffic study was submitted to DPD by Heffron Transportation, Inc dated November 15, 2006 and amended on February 8, 2007 evaluating the impacts of both proposed developments to the surrounding street system.

The vehicular traffic generated by the project will be business-related and will likely peak during the weekday PM hours. As depicted in the traffic study, trip generation information was calculated using average PM peak hour trip generation rates obtained from the Seventh Edition of the ITE *Trip Generation Manual*. For the existing development, trip generation rates associated with Warehouse (150) was used. For the proposed development, trip generation rates were based on the specifics of the proposed operations for both projects, including staff, service customers, service shuttle, sales customers and deliveries.

Using the ITE data, there will be approximately 40 additional PM peak hour trips. The level of service analysis shows that none of the alternatives (year 2009 with or without the project) would degrade the level of service at study intersections to below the City of Seattle standard (Level D). Therefore, this relatively low number of additional trips will not adversely impact the existing levels of service of surrounding intersections.

The estimated increase in trips during the PM peak hours is not considered a significant impact and no mitigation measures or conditioning pursuant to the SMC Chapter 25.05, the SEPA Ordinance is warranted.

### Parking

The existing sites contain no parking spaces. Between the two sites, 170 parking spaces will be provided for use by staff and customers. The proposed parking spaces are located both within the proposed buildings, as well as on surface parking lots. Using the Parking Demand Analysis prepared by Heffron Transportation Inc dated November 15, 2006 and amended on February 8, 2007, parking generation rates associated with the proposed auto sales, service and storage uses were used.

On a weekday, parking demand would peak at 111 spaces; weekend demand would peak at 124 spaces. The proposed parking supply for the project is 170 spaces, which exceeds the expected peak demand. Therefore, the site will provide adequate off-street parking to accommodate all parking demand.

Therefore, the project is not expected to generate adverse parking impacts, and no mitigation is required.

### 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.

- 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. For the duration of the construction activity, the applicant/responsible party shall cause construction truck trips to cease during the hours between 4:00 p.m. and 6:00 p.m. on weekdays.

Compliance with all conditions must be verified and approved by the Land Use Planner, Lisa Rutzick, ph.: 206-386-9049, at the specified development stage, as required by the Director's decision. The applicant/responsible party are responsible for providing the Land Use Planner with the appropriate documents at the construction intake appointment. The Land Use Planner shall determine whether the condition requires submission of additional documentation or field verification to assure that compliance has been achieved.

Signature: \_\_\_\_\_ (signature on file) Date: March 29, 2007  
Lisa Rutzick, Land Use Planner  
Department of Planning and Development  
Land Use Services