



City of Seattle

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

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

Application Number: 3005261
Applicant Name: Seattle Housing Authority
Address of Proposal: 4500 Martin Luther King Way S. (MLK)

SUMMARY OF PROPOSED ACTION

Council Land Use Action for an alteration of subdivision (approved under Project No. 2000638) to blocks 27 through 54 (east side of Martin Luther King Jr. Way S.) of the New Rainier Vista plat. The application includes revisions to lot lines, easements and plat conditions (regarding Boys and Girls Club location). The project also includes street and alley vacations. An EIS addendum has been prepared by the Seattle Housing Authority.¹

The following approvals are required:

Full Subdivision - SMC Chapter 23.22

SEPA substantive authority - SMC Chapter 25.05

SEPA DETERMINATION: Exempt DNS MDNS EIS²
 DNS with conditions
 DNS involving non-exempt grading or demolition or
involving another agency with jurisdiction.

¹Project originally noticed as; Council Land Use Action for an alteration of subdivision (approved under project no. 2000638) to blocks 27 through 54 (east side of Martin Luther King Jr. Way S.) of the New Rainier Vista plat. The application includes revisions to lot lines, easements and plat conditions (regarding Boys and Girls Club location). The project also includes street and alley vacations and a new dedication. An EIS addendum has been prepared by the Seattle Housing Authority.

²The Seattle Housing Authority prepared and issued a Draft and Final EIS on May 2, 2001 and October 1, 2001 respectively. An EIS addendum was issued on October 10, 2006.

BACKGROUND INFORMATION

Proposal Description

In August 1999, the Office of Housing and Urban Development awarded Seattle Housing Authority with a \$35 million HOPE VI grant to redevelop Rainier Vista, a 481-unit World War II-era garden community in Southeast Seattle. Funds from the grant are being used to redevelop a community consisting of 1,010 dwelling units, parks and recreation spaces, retail, office, community and institutional uses. The goal for the community is to create a safe, transit-oriented, mixed-income, mixed-use community integrated into the surrounding neighborhood and developed into smaller sub-areas with individual characteristics. The first phase of the redevelopment (west of Martin Luther King Jr. Way South) is substantially completed. The second phase of the redevelopment (east of Martin Luther King Jr. Way South) is the subject of this application and involves an alteration to a plat that was previously approved.

On February 6, 2003, the Hearing Examiner approved the preliminary subdivision for Rainier Vista subject to numerous conditions (2000638; MUP-02-017 (SD)). A subsequent final plat was approved by City Council and recorded with King County. Numerous related actions were acted on with respect to the development including; a Master Use Permit conditionally approving 222 dwelling units for SHA rental housing and substantive SEPA review for conditioning; Street Vacation (Clerk File 304248); legislative rezone (Ordinance 120561) and Memorandum of Agreement (Ordinance 120562).

Subsequent to the Hearing Examiner's approval of the former preliminary plat (2000638), the Seattle School District withdrew its parcel of the property from the subdivision application, necessitating alteration of the final plat and amendment of the legal description of the land subject to the subdivision. As a result 31st Avenue South does not connect to South Alaska Street; instead it was approved as a cul de sac. City Council found that the final plat remained in substantial conformance with the approved preliminary plat.

In fall 2004, SHA teamed with the city of Seattle to apply for a Kroc Foundation Grant, which would have provided funds for a large regional Community Center to be located in the southeast quadrant which consists of block 27 through 33 of Rainier Vista. The Boys and Girls Club (BGC) was to develop a community center and playfields on block 43 which was an integral part of the development. The grant was not awarded to the city of Seattle but illustrated opportunities with respect to the siting of the Kroc Center, and provided a catalyst for SHA and the Boys and Girls Club to explore using the same site for the BGC Community Center. It was found that siting the BGC in the southeast quadrant would provide space for a larger community center and larger playfield than what could be provided on Block 43. However, housing planned for this area would need to be moved to block 43, and streets proposed in the southeast quadrant would need to be vacated to make space for playfields and the BGC campus.

To facilitate the new proposal it was recognized that the plat on the east side of MLK would need to be altered with respect to;

- relocating housing units from the block 27 through 33 (southeast quadrant) to block 43
- relocating open space from block 43 to the southeast quadrant and revising plat conditions relating to open space
- vacating streets in the southeast quadrant

-adjusting lot lines and creating new lots to accommodate housing

Related Actions

A Street Vacation petition (Clerk File 307939) is being reviewed with Seattle Department of Transportation (SDOT) to vacate a portion of 31st Avenue South, South Snoqualmie Street, Alleys "U", "W", and "X" in the southeast quadrant.

There are numerous building permits under review for SHA rental housing and for sale developments throughout the Rainier Vista redevelopment. A grading permit (#6114199) for major grading and drainage for the entire redevelopment is active in that work is on-going at the project site.

There are two Master Use Permit applications currently under review and one in pre-submittal phase;

Project No.	Block	Description
3003825	43	Land use application to allow twelve new structures including a four story, mixed use building with 1,425 square feet of customer service office over 27 apartment units; a four story 27 unit apartment building; and 28 residential units within ten structures for a total of 82 units. (SHA). Parking for 75 vehicles will be provided. Addendum to EIS has been prepared by the Seattle Housing Authority.
3006707	29.30.31	Land use application to allow a two story 40,265 sq ft community center (Rainier Vista Boys & Girls Club), ball field, and a 6,000 sq. ft. playground with surface parking for 80 vehicles. Project includes grading of 3,482 cu. yds. of material. Addendum to environmental impact statement prepared by Seattle Housing Authority.
3007154	27	Future construction of a 4-story mixed use building with surface parking

Public Comment

We received no public comments during the comment period which ended on November 8, 2006.

Analysis and Recommendation of the Director - The Land Use Code (Section 23.76.023) requires the Director of DPD to prepare a written report for a proposed preliminary plat. The Code calls for the Director's report to include the following:

- 1. The written recommendations/comments of City departments and other governmental agencies having an interest in the application;*
- 2. Responses to written comments submitted by interested citizens;*

3. *An evaluation of the proposal based on the standards and criteria for subdivisions contained in SMC 23.22*
4. *All environmental documentation, including any checklist, EIS or DNS; and*
5. *The Director's recommendations to approve, approve with conditions, or deny the application.*

The Director's report is submitted to the Hearing Examiner and made available for public inspection for at least thirty (30) days prior to the Hearing Examiner's public hearing.

Hearing Examiner Findings and Conclusions - The Land Use Code Section 23.76.024 requires that the Hearing Examiner conduct a public hearing on the subdivision application (including the proposed Unit subdivision). The Hearing Examiner can approve the proposal if it is determined that the proposed plat makes appropriate provision for the public health; safety and general welfare; open spaces; drainage ways; streets, alleys, other public ways; water supplies; sanitary waste disposal; fire protection; parks; playgrounds; sites for schools and school grounds; and that the public use and interest will be served by the platting of the subdivision. If the Hearing Examiner determines that the proposed plat does not provide the appropriate elements or that the public use and interest will not be served, the proposed plat may be denied. After the hearing, the Hearing Examiner will make his/her decision which is final city decision on a preliminary subdivision.

Council Action - The Council review process changed in March, 1996 in response to regulatory reform legislation and made the approval of preliminary plats for subdivisions a Hearing Examiner decision. A formal action to approve the final plat is still the responsibility of the City Council as provided by RCW 58.17. However, the Council does not hold a public meeting for the purpose of accepting testimony. After the Hearing Examiner approves the preliminary plat, the Council reviews the final plat for consistency to the preliminary plat.

DIRECTOR'S ANALYSIS – SUBDIVISION

1. Recommendations and Comments by City Departments and Other Government Agencies Having an Interest in the Application

The following represents a summary of the comments received from the agencies indicated. Information and documentation from each review agency is available in the DPD project file. This review is required per SMC 23.22.024, with plans and supporting information distributed to each department.

A. Director Seattle Department of Transportation (SDOT)

On November 30, 2006, SDOT indicated that they can not recommend approval of the Plat. The letter raised issues with pedestrian path connections for both

north/south and east/west movements, the size and scale of the block also pose some concern, and the required public benefit portion of the proposed street vacation is not clear.

On May 4, 2007, SDOT recommended approval of the phase 2 plat alterations with the following condition;

1. No building permits for phase 2 of Rainier Vista can be issued prior to SHA working out the SPU easements for the storm and sewer mains that will go through private property at the south end of the site.
2. The street improvement plans for phase 2 of Rainier Vista can not be re-submitted to SDOT for review until the SPU easements are reviewed and approved by SPU.

B. Director of Seattle Public Utilities (SPU)

DPD received comments from two divisions of SPU, Real Estate Services and staff coordinating the issuance of water availability certificates. DPD is also aware that the applicant has been working with the Engineering Services Division (Herman Wong) with respect to the location of a storm and sewer easement that must go through private property; however, DPD has not received any comments from this staff person.

A Water Availability Certificate (#2006-1966) was approved and issued on October 16, 2006 indicating that the land use permit may be approved at this time.

The Real Estate Services Unit provided comments in a Memo of January 26, 2007. The memo outlined requirements for the identification, width and location of easement areas. Other comments made will pertain to the dedication of easements that will occur with the final plat.

C. Superintendent of Seattle City Light

Seattle City Light provides electrical service to the subject property and has indicated that a blanket easement is required. The easement as described in Seattle City Light memorandum dated October 25, 2006 with the subject heading, Full Plat No. 3005261 for New Rainier Vista (Plat Alteration)- P.M.# 240431-3-008 shall be included on the final plat prior to recording.

D. Chief, Fire Department

The Fire Department approves this Plat, subject to Ordinance, field inspection, and providing the corrections are made or conditions met which are stated in the correspondence of December 8, 2006 (Plan Review No.24982) to Tonkin Hoyne Lokan Architects.

E. Director of Public Health

The Director of Public Health indicates they favor the Plat in their e-mail correspondence of October 11, 2006. Public Health urges the play structures to be included as part of the park infrastructure, emphasize tree retention, attend to adequate grading and stormwater conveyances to minimize threat of West Nile virus, provide same level of lighting of street lighting to the park areas and walkways, give stronger consideration of traffic calming devices and/or street design features for low vehicle speeds, and attend to the pedestrian safety of those residents traversing Martin Luther King Jr. Way South.

F. Director of Housing

The Director of Housing indicates they favor the Plat as stated in their e-mail correspondence of October 25, 2006.

G. Superintendent of Parks and Recreation.

The Superintendent of Parks and Recreation reviewed the Plat as parts of prior transactions and consideration of other issues and has no further comments at this time as stated in their e-mail correspondence of January 22, 2007.

H. Metropolitan Services Department (King County METRO)

Responded with no comments in an e-mail correspondence of January 22, 2007.

I. Department of Planning and Development Drainage Review.

Comments were received on October 10, 2006 indicating that there is no drainage or sanitary sewer comments/issues with the proposed plat alteration. The proposed street vacations result in block 29 being landlocked without frontage to a public street for utility access. The improved streets surrounding blocks 27-33 are to be improved with both sanitary sewers and public storm drains. It is unclear from the submitted utility plan, sheet C8.3, if the proposed “new utility easement”, presumably to the benefit of SPU will run through proposed Block 29. The following condition was recommended;

If the “new utility easement” referred to above does not pass through proposed block 29, utility easements should be provided to the benefit of this block.

2. Responses to Written Comments of Interested Citizens

No comment letters were submitted to DPD.

3. Evaluation of the Proposal Pursuant to Applicable Codes

Land Use Code:

The Hearing Examiner shall conduct a public hearing and is the decision maker for subdivisions as specified in the Procedures Chapter of the Land Use Code (SMC 23.76.023 and SMC 23.76.024).

The preliminary plat process, technical standard and considerations are specified in SMC 23.22. The Hearing Examiner must evaluate the proposal based on the following, as specified in SMC 23.22.054. The Director’s comment and/or recommendation follow each applicable criterion:

The Hearing Examiner shall inquire into the public use and interest proposed to be served by the establishment of the subdivision and dedication. The Hearing Examiner shall consider all relevant facts to determine whether the public interest will be served by the subdivision and dedication, and if it finds that the proposed plat makes appropriate provision for the public health, safety and general welfare and for open spaces, drainage ways, streets, alleys, other public ways, transit stops, potable water supplies, sanitary wastes, fire protection facilities, parks, playgrounds, sites for school and school grounds, sidewalks and other planning features that assure safe walking conditions for students who walk to and from school, is designed to maximize the retention of existing trees, and that the public use and interest will be served by the platting of subdivision, then it shall be approved. If the Hearing Examiner finds that the proposed plat does not provide the appropriate elements or that the public use and interest will not be served, then the Hearing Examiner may disapprove the proposed plat. Dedication of land to any public body may be required as a condition of subdivision approval and shall be clearly shown on the final plat. The Hearing Examiner shall not as a condition to the approval of any plat require a release from damages to be procured from other property owners.

The proposed subdivision has been reviewed by interested agencies within the City and outside agencies have had an opportunity to review and comment. The following issues warrant further discussion, comment and recommendation.

Open Space:

The subdivision continues to provide adequate open space. The following depicts the amount of open space and recreational space proposed in 2001 as compared to the current proposal;

	2001 Plat	Proposed Plat Alteration
Block 28	9,035 sf	-
Block 33 lot 3 & 4	25,834 sf	25,834 sf
Block 34 lot 3	12,615 sf	12,615 sf
Block 43	118,278 sf	23,480 sf
Block 50	15,074 sf	15,074 sf
Block 54	7,667 sf	7,667 sf
Block 27-33	-	158,914 sf
	188,503 sf	270,584 sf

The design of the Boys and Girls Club has evolved over time and the footprint originally envisioned for the facility has increased since the original plat was under review. When the 2001 plat was recorded it was not known how large the Boys and Girls facility was to be, but it was DPD’s understanding that the building and parking was to be accommodated on the

southwest corner of block 43; however, the entire block was labeled as open space. This resulted in a note on the final plat as follows:

Note on the face of the plat the following: "Block 1, Lot 1; Block 2, Lot 1; Block 3, Lot 1; Block 7, Lot 3, Unit Lot "h"; Block 21; Block 25, Lot 2; Block 26, Lot 1; Block 33, Lot 4; Block 34, Lot 3; Block 43; and Block 50 shall each be used in perpetuity as open space and recreation in conformance with the Open Space and Recreation Plan, Sheet L2.1, dated March, 15, 2002, in Exhibit 50. A portion of Block 43 may be developed with structures to support the Boys and Girls Club or the City of Seattle and recreational equipment and/or facilities may be allowed in any of these lots consistent with the activities proposed in the Open Space and Recreation Plan."

The plat must be altered to remove the above plat condition to allow for housing on block 43. When comparing the quantity of open space proposed under the original plat and the proposed plat it includes the lot area developed with building and parking lot for the Boys and Girls Club. In light of that the proposed "open space" includes about 88,500 square feet of building and parking lot for the Boys and Girls Club. Also, it should be noted that the plat will gain about 62,249 square feet from a proposed street vacation assuming it is approved.

Tree Retention:

SHA proposed an ambitious tree preservation plan in 2001 and additionally was subject to a settlement agreement that pertained to the retention of trees along the south east boundary of the redevelopment. It was recognized that many of the proposed lots are to be developed by developers other than SHA and that retaining all the trees proposed to be retained could be difficult. In light of that, the Hearing Examiner conditioned the plat to retain trees to the "greatest extent practicable".

The health and/or condition of many of the trees have resulted in changes to the tree preservation plan. This is to be expected over the course of six years and adverse weather the region has experienced. The tree preservation plan for the east side of Martin Luther King Jr. Way South has 115 trees listed, and the following provides a breakdown of the changes to the tree preservation list;

TREE PRESERVATION		
2001 Plat	Proposed Plat Alteration	Quantity of Trees Studied
No change to tree status	No change to tree status	42
Remove	Replace	36
Remain	Remove	9
Transplant	Remove	24
Remain	Replace	3
Remain	Transplant	1
TOTAL TREES STUDIED		115

Based on plans date stamped by DPD as May 3, 2007, six trees that were to remain in 2001 are now proposed to be removed within the area affected by the plat alteration. Overall, 36 trees that were to remain or be transplanted are proposed to be removed, but 36 trees slated to be removed will be replaced with either a 4 inch or 8 inch caliper tree. The plat alteration has minimal

impact on the preservation of trees. As part of the street vacation process, SHA has created a public benefit package in the southeast quadrant which includes a series of pedestrian paths and open spaces. As a part of this plan, SHA together with the Boys and Girls Club adjusted the locations of development in part to retain trees. As a result several existing trees will become focal points in the landscape.

Street Vacations and Improvements:

The design goal for Rainier Vista is to create a mixed-income, mixed-use, transit -oriented community that is integrated into the surrounding neighborhood. Part of this vision includes reconfiguring the street network to create a grid system typical of other Seattle neighborhoods. The previous street configuration before redevelopment consisted of meandering streets which often did not connect to the surrounding streets outside of the Rainier Vista community. The circulation and access will be substantially improved when evaluating the entire community as a whole.

SHA has petitioned for street vacations that are currently under review with SDOT and are depicted on sheet C1.1 of plans date stamped May 3, 2007. SHA wants to vacate a portion of 31st Avenue South, South Snoqualmie Street, Alleys "U", "W", and "X" all located in the southeast quadrant of Rainier Vista. The additional square footage gained from the vacation enables the development of a larger playfield and larger Boys and Girls Club facility.

On February 15, 2007, The Seattle Design Commission completed their review and concluded that the public benefit package is adequate. The next step is for City Council to review the vacation petition which is expected to occur this summer.

The street improvements are described on sheet C3.1 and C3.2. in plans date stamped March 27, 2007. All improvements on the west side of Martin Luther King Way Jr. South (MLK) are nearing completion or completed under Street Improvement plan # T02-1229. Improvements on the east side of MLK are pending approval at SDOT.

DPD concludes that the subdivision makes appropriate provision for the public health, safety and general welfare and for open spaces, drainage ways, streets, alleys, other public ways, transit stops, potable water supplies, sanitary wastes, fire protection facilities, parks, playgrounds, sites for school and school grounds sidewalks and other planning features that assure safe walking conditions for students who walk to and from school. As listed above, the appropriate departments and agencies responsible for provisions such as parks, water, fire and transportation networks have commented and conditioned, if necessary, the subdivision to ensure appropriate provisions.

The subdivision as a whole will meet all minimum standards or applicable exceptions prescribed in the Land Use Code, and are consistent with applicable development standards. The proposed parcels provide adequate buildable area to meet applicable setbacks, lot coverage requirements, and other Land Use Code development standards. The construction of any buildings will be reviewed pursuant to the Building Code to ensure public health, safety and general welfare.

Public sidewalks or walkways will abut all the sites to assure students the infrastructure to walk to and from school. Most vehicular access will be via an improved alley and in some cases a private easement. Adequate infrastructure can be provided with this subdivision either in existing dedicated street right of way or in a dedicated easement.

Unit Subdivision:

SMC 23.22.062A through F provides rules for Unit lot subdivisions.

SMC 23.22.062B requires that the development as a whole shall meet development standards of the underlying zone, which this proposal does, but further provides that development on individual unit lots may be nonconforming as to some or all of the development standards based on analysis of the individual unit lot, except that any private, usable open space for each dwelling unit shall be provided on the same lot as the dwelling unit it serves.

SMC 23.22.062C states: *Subsequent platting actions, additions or modifications of the structure(s) may not create or increase any nonconformity of the parent lot.*

SMC 23.22.062D states: *Access easements and joint use and maintenance agreements shall be executed for use of common garage or parking areas, common open space (such as common courtyard open space for cottage housing), and other similar features, as recorded with the Director of King County Department of Records and Elections.*

SMC 23.22.062E states: *Within the parent lot, required parking for a dwelling unit may be provided on a different unit lot than the lot with the dwelling unit, as long as the right to use that parking is formalized by an easement on the plat, as recorded with the Director of King County Department of Records and Elections.*

SMC 23.22.062F states: *the fact that the unit lot is not a separate buildable lot and that additional development of the individual unit lots may be limited as a result of the application of development standards to the parent lot shall be noted on the plat, as recorded with the King County Department of Records and Elections.*

The plat alteration proposes some changes to unit lots to accommodate the relocation of housing, but does not significantly alter the quantity or original intention.

DPD recommends that notes, covenants, easements and the like be noted and recorded on the final subdivision plat to be consistent with the above stated code provisions for unit lot subdivisions. Please note that these are typically recorded prior to master use permit issuance since they are commonly associated with short plat subdivisions.

Based upon the recommendations of DPD, the public use would be served by approving the proposed. The unit lot configurations depicted on the proposed plat map provides sufficient building area on each parcel to permit construction of future dwelling units with a townhouse type configuration.

Based upon the recommendations of DPD, the public use would be served by approving the subdivision.

4. **All environmental documentation, including any checklist, EIS or DNS**

Environmental Review is conducted with this application.

5. **The Director's recommendation to approve, approves with conditions, or denies the application**

The Director of DPD recommends approval of the Preliminary Plat under SMC 23.22.028. In addition, the Director also **recommends the approval** of the following **conditions** referenced below.

RECOMMENDED CONDITIONS - SUBDIVISION

Recommended Conditions of Approval Prior to Recording of the *Final* Subdivision Plat:

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

1. Note on the plat all the conditions listed in this recommendation, as may be modified by the Hearing Examiner.
2. Have final recording documents prepared by or under the supervision of a Washington state licensed land surveyor in accordance with SMC 23.22.
3. Include an easement to provide for electrical facilities and service to the proposed lots as required by Seattle City Light (aka Exhibit A) on the final subdivision plat.
4. Insert the following on the face of the plat: "The unit lots shown on this site are not separate buildable lots, and the dwelling units constructed on this site constitute non-conforming structures pursuant to SMC 23.42.112. Additional development on any individual unit lot in this subdivision may be limited as a result of the application of development standards to the parent lot pursuant to applicable provisions of the Seattle Land Use Code, Chapter 23 of the Seattle Municipal Code."
5. Provide a joint maintenance and responsibility agreement for maintenance and use of shared walls on property lines and all ingress, egress and utility easements.
6. Provide a covenant, easement or other such agreement to allow for the posting of address sign for all unit lots at a location visible from public rights of way and provide a covenant and/or an easement to ensure that address signage can be maintained.
7. Provide and record easement(s) to the satisfaction of Seattle Public Utilities for sewer, water and drainage facilities and appurtenances.
8. Approval from City Council for the proposed Street Vacation.

ANALYSIS – SEPA

Environmental impacts of the proposal have been analyzed in environmental documents prepared by Seattle Housing Authority. These include a Draft Environmental Impact Statement (DEIS) dated May 2, 2001 and a Final Environmental Impact Statement (FEIS) dated October 1, 2001. An EIS addendum was issued on October 10, 2006.

Seattle Municipal Code (SMC) section 25.05.660 provides that proposals can be conditioned or denied in order to mitigate environmental impacts. All conditions must be related to impacts identified in the environmental documents, based on adopted policies, be reasonable and capable of being accomplished. This proposal is reviewed under that substantive SEPA authority.

Disclosure of the potential impacts from this project was made in the environmental documents listed above. This information, supplemental information provided by the applicant (plans, written descriptions of the project and traffic analysis) and the experience of this agency with review of similar projects form the basis for this analysis and conditioning.

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, and 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 the limitations set forth in subparagraphs D1 through D7 below. Unless otherwise specified in the Policies for Specific Elements of the Environment (SMC Section 25.05.675), denial or mitigation of a project based on adverse environmental impacts shall be permitted only under the following circumstances:...". The SEPA Overview Policy (SMC 25.05.665) D1 through D7 and Specific Elements of the Environment (SMC Section 25.05.675) provide the circumstances in which denial or mitigation of a project can take place.

The Draft EIS evaluated three alternatives: a No Action; Alternative 2 (1,010 units); and Alternative 3 (1,879 units). Following publication of the DEIS, and in response to comments received, SHA selected Alternative 2 as the Preferred Alternative. A detailed description of alternative 2 can be found on page 2-3 of the FEIS. In general, the level of proposed development under the proposal would be similar to or less than that analyzed in the EIS for the Phase 2 portion of the site under the Preferred Alternative (Alternative 2). As exhibited in table below, the level of development under the proposal for the Phase 2 portion of the site would be similar to that analyzed in the EIS.

COMPARISON OF PROPOSAL AND PREFERRED EIS ALTERNATIVE
(Source: Rainier Vista Redevelopment EIS Addendum page 2-3)

Rainier Vista Phase 2	Preferred Alt. (Alt. 2)	Proposal
Site Area (acres)	30	30
Total Residential Units	482	401

Low-Income Replacement Rental Housing Units with Preference for 0 – 30% AMI	185	168
Affordable Rental	59	58
Affordable & Market Rate For-Sale	238	175
Boys and Girls Club (sq. ft.)	19,000	40,000
Park Area (acres)	3.7	3.7
Commercial Space (sq. ft.)	24,000	30,000
31st Ave. South of Oregon St.	Cul-de-sac	Driveway, Parking Lot & Recreational Field

Short - Term Impacts

Construction related impacts were identified and mitigated under project number 2000638 and grading permits subsequently issued. Construction activity and grading is occurring on an on-going basis pursuant to a Construction Mitigation Plan (CMP). The mitigations proposed and implemented are valid and no new mitigation is necessary pursuant to SEPA authority.

Long - Term Impacts

The proposal does not substantially change the identified impacts under Project No. 2000638 with respect to long term impacts; however, traffic impacts are discussed in more detail below.

The impacts identified in environmental documents and subsequent mitigation under project number 200638 and the Hearing Examiner are still valid and no further conditioning is necessary. Additionally, DPD may exercise SEPA substantive authority for SHA and The Boys and Girls Club developments now under review at DPD as referenced earlier in this document.

Traffic

The EIS addendum included a Traffic Analysis, entitled Rainier Vista Phase 2 EIS, Traffic Analysis Impact Study 2nd Update dated October 2006 and prepared by Parsons Brinkerhoff Quade & Douglas, Inc. The study is a 2nd update in that an update was prepared to the EIS in 2003 in connection with the final plat. The recorded final plat included 31st Avenue S as a cul-de-sac south of Oregon Street as compared to the 31st Avenue S connection south to Alaska Street as analyzed in the EIS. A follow-up traffic analysis (Rainier Vista Phase 2 EIS Traffic Analysis Update, September 2003, by Parsons Brinkerhoff Quade & Douglas Inc.) was prepared to support the final plat application that included this 31st Avenue S cul-de-sac.

The proposed changes to the site plan primarily focus on the relocation of the Boys & Girls Club from the north side of Oregon Street to the south side and expanding the facility from roughly 20,000 square feet (as analyzed in the original EIS) to 40,000 square feet. However, with this relocation would also come a shifting of land use to fill in the area originally slated for the Boys & Girls Club. The residential units just south of Oregon Street on block 27-33 would be moved to the north, block 43, to balance out the overall land use composition. Accordingly, the overall number of proposed units would be reduced by roughly 80-90 units compared to that analyzed for in the EIS, and the amount of commercial space would be increased slightly. Roadway network changes would include the full vacation of 31st Avenue S south of Oregon Street to create a driveway and parking lot exclusively for the Boys & Girls Club, in comparison to the

31st Avenue cul-de-sac included in the previously approved plat. S Snoqualmie Street east of MLK Jr. Way S and associated alleys would also be vacated.

The proposed plat alteration will result in a localized redistribution of site-generated traffic for the project relative to peak hour volumes estimated from the original EIS traffic analysis and the follow-up analysis for the final plat application. The impacts of this redistribution on alternate routes such as Oregon Street, Alaska Street, and Martin Luther King Jr. Way were evaluated at the planning-level to ascertain whether or not mitigation would be needed to accommodate any added traffic loads at the affected intersections. The results of the redistribution process indicate that only modest changes in traffic volume would occur at the key intersections compared to the 2003 traffic analysis update, with negligible operational impacts during the critical PM peak hour period. Thus, the plat alteration would result in no significant operational impacts at the study intersections.

The EIS and previous plat decision (2000638) identified that two signalized intersections in the study area would experience lower levels-of-service than the No Action Alternative: MLK Jr. Way S. /S. Columbian Way (LOS B to LOS C with a moderate increase of delay of 3 seconds per vehicle) and Beacon Avenue S. /S. Columbian Way (LOS D to LOS E with an increase in delay of 4 seconds per vehicle). Mitigation strategies to improve intersection operations were identified in the DEIS for Beacon Avenue S/ S. Columbian Way. Therefore, the Hearing Examiner imposed a condition that SHA “contribute a fair share towards future street improvements at the intersection of Beacon Avenue S/S. Columbian Way as determined by Seattle Transportation. The City will forfeit any contributions from SHA, if additional funds are needed to complete all the intersection improvements, and they do not become available by completion of all phases of SHA Rainier Vista development (currently scheduled for August 2007).” The mitigation above remains valid and should be a condition of approval for the plat.

CONDITIONS – SEPA

None (the previous imposed SEPA conditions remain enforce)

Signature: _____ (signature on file) Date: May 10, 2007
Jess Harris, AICP Senior Land Use Planner

JH:bg

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