



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: 3005308

Applicant Name: Steve Yoon for Harbor Properties

Address of Proposal: 84 Union Street

SUMMARY OF PROPOSED ACTION

Land Use Application to change the use of two floors (13,540 square feet) from a 125 bed lodging (Youth Hostel) use to apartment units (a total of 27 apartment units). The existing retail space at ground level will remain.

The following approvals are required:

SEPA - Environmental Determination - Chapter 25.05 SMC

SEPA DETERMINATION: [] Exempt [] DNS [] MDNS [] EIS
[X] DNS with conditions
[X] DNS involving non-exempt grading, or demolition,
or involving another agency with jurisdiction.

BACKGROUND DATA

Site Description

This 7,203 square foot site is located in a Pike Market Mixed (PMM 85') zone in the Pike Place Market Historic District. The site is located at the northeast corner of Union Street and Western Avenue near the Pike Place Market in Downtown Seattle. The site is currently developed with a four story brick and terra cotta building, formerly the Union Hall and originally constructed in 1905 as the Immigration Office. The building is currently used as a Youth Hostel. The building's main entrance is on Western Avenue, with secondary entrances on Union Street and off of Post Alley. Union Street in this vicinity slopes steeply up to the east and does not go through to First Avenue, because there is a parking garage which occupies most of the abandoned right-of-way east of Post Alley. The top floor of the existing building is connected to the upper portion of Union Street (and onto First Avenue) by a skybridge. There are no street trees planted in the adjacent right-of-way. There is no off-street parking associated with this building.

Area Development

The site is located one-half block south of the Pike Place Market Historical District on Western Avenue, which is an area of new mixed-use buildings and many older buildings which either have been renovated or are in the process of renovation. To the immediate east of the project is the 98 Union condominium/retail complex. To the north is a new highrise senior housing project; to the west are several rehabilitated buildings and the Hillclimb Court, and to the south is the City Light substation.

Proposal Description

The applicants propose to convert the youth hostel (floors 2 and 3) into 18 apartments and convert/upgrade the 10 apartments on the 4th floor to 9 high-end residential units. The roof will be unchanged with the exception of installing a new elevator (servicing floors 2 through 5). The first floor and basement will largely be unchanged (although some piping may be needed to be installed through some of the existing space and a footing may be installed. The skybridge and east facade will be upgraded for aesthetic appearance, an elevator will be installed to service floors 2 through 5, and a stairwell will be relocated. Each floor plate will be approximately 6,800 square feet.

Public Comment

No comment letters were received during the comment period which ended December 13, 2006.

ANALYSIS-SEPA

The initial disclosure of the potential impacts from this project was made in the environmental checklist submitted by the applicant (dated November 13, 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.

Short-Term Impacts

Construction activities could result in the following adverse impacts: construction dust and storm water runoff, 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 Seattle Department of Transportation, and no further SEPA conditioning would be needed.

The proposal 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 proposal site. The proposal is, therefore, conditioned to limit construction activity to non-holiday weekday hours between 7:00 A.M. and 6:00 P.M. and Saturdays from 9:00 A.M. to 6:00 P.M. 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.

Long-Term Impacts

Long-term or use-related impacts are also anticipated from the proposal: increased surface water runoff from 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 a mixed-use structure 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 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.

Drainage

Rain water on roof will be the major source of water runoff on the site. The rain water on the roof will be collected in gutters and connected to the storm drainage system. No drainage will be directed to the adjoining streets. Verification of an appropriate stormwater control system and its proposed location of connection to the public system will be required to be shown on the construction plans. No additional mitigation measures will be required pursuant to SEPA.

Height, Bulk, and Scale

Section 25.05.675H1 and 2 of the Seattle SEPA Ordinance provides the following: “Historic buildings, special historic districts, and sites of archaeological significance are found within Seattle. The preservation of these buildings, districts and sites is important to the retention of a living sense and appreciation of the past. Historic sites, structures, districts and archaeological sites may be directly or indirectly threatened by development or redevelopment projects. Special districts have been established to protect certain areas which are unique in their historical and cultural significance, including for example Pike Place Market, Pioneer Square and the International District. These areas are subject to development controls and project review by special district review boards. It is the City’s policy to maintain and preserve significant historic sites and structures and to provide the opportunity for analysis of archaeological sites. For projects involving structures or sites which have been designated as historic landmarks, compliance within the Landmarks Preservation Ordinance shall constitute compliance with the policy set forth in subsection H2a above.” Any sensitive height, bulk or scale impact issues will be addressed during the Pike Place Market Historic District Board review process in the design of this project as determined by the Board’s review and unanimous approval. 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 estimates that apartment buildings generate 6.1 vehicle trips per day per unit, retail stores generate 44.32 vehicle trips per day per 1,000 square feet of gross floor area. Based on the estimates in the Trip Generation Manual the 27 units would generate approximately 164.7 vehicle trips per day. There would be no change in vehicle trips generated by the existing ground floor retail uses. Regarding traffic mitigation, Section 25.05.675R2d of the Seattle SEPA Ordinance states: “Mitigation measures which may be applied to residential projects in downtown are limited to the following: i. Signage, ii. Provision of information on transit and ride-sharing programs; and iii. Bicycle parking.” No further traffic mitigation pursuant to SEPA will be required. However, the availability and proximity of transit 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 vehicle access to First Avenue, Western Avenue, Interstate 5, and Highway 99 on the Viaduct. The volume of traffic along First Avenue is high and nearby intersections operates at acceptable levels. The amount of traffic expected to be generated by the proposed project is within the capacity of the streets in the immediate area. Therefore, no SEPA mitigation of traffic impacts is warranted.

Parking

No offstreet parking is required for this project. The parking policy in Section 25.05.675M2b of the Seattle SEPA Ordinance states that no SEPA authority is provided to mitigate the impact of development on parking availability in the downtown zones. Parking utilization in the vicinity appears to be at capacity. However, car ownership by the occupants of the units is anticipated to be lower than average due to the downtown location of the building, accessibility to transit, and the availability of goods and services and employment opportunities within walking distance. Therefore, no mitigation of parking impacts is required pursuant to SEPA.

SUMMARY

In conclusion, several adverse effects on the environment are anticipated resulting from the proposals which are nonsignificant. 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

During Construction

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

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 7:00 a.m. and 6:00 p.m. and on Saturdays from 9:00 a.m. to 6:00 p.m. This condition may be modified by the Department to permit work of an emergency nature of to allow low noise exterior work after approval from the Land Use Planner. Interior work may proceed at any time in compliance with the Noise Ordinance.

Signature: _____ (signature on file)
Malli Anderson, Land Use Planner
Department of Planning and Development

Date: June 14, 2007