



City of Seattle

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:** 3006181  
**Applicant Name:** Charlie Shugart for Thorndyke Avenue, LLC  
**Address of Proposal:** 3443 Thorndyke Avenue West

**SUMMARY OF PROPOSED ACTION**

Land Use Application to change the use of an existing structure from warehouse and office to light manufacturing, and expand the use by 31,631 square feet for a total of 45,631 square feet. Included in the proposal is 11,354 square feet of below-grade parking for 33 vehicles.

The following approval is required:

**SEPA - Environmental Determination** – Chapter 25.05, 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 and Vicinity Description

The subject site is a 39,905 square foot lot zoned General Industrial 2 with a height limit of 45 feet (IG2 U/45). The site is located on Thorndyke Avenue West, between West Bertona Street and the 15<sup>th</sup>/Emerson Ramp, in Seattle’s Interbay neighborhood. The irregularly shaped lot is currently developed with a single story, concrete construction building currently in use as warehouse and office; the remaining portion of the lot, to the north, is vacant (Figure 1). Immediately west of the site is the Burlington Northern Railroad tracks and right-of-way. The property slopes gently toward the north-northwest, with an estimated elevation change of about 5 feet across the site.<sup>1</sup>



**Figure 1.** Aerial Photo (2005).

<sup>1</sup> *Seismic Soil Classification Considerations*. Geotechnical report prepared by Adapt Engineering, Inc., for Thorndyke Avenue, LLC, March 15, 2007.

Zoning north, south, and east of the site is IG2 U/45; zoning changes to a more intensive zone, General Industrial 1 with a height limit of 45 feet (IG1 U/45) immediately west of the subject site (Figure 2). Surrounding development reflects area zoning and consists of warehouse, light manufacturing, and commercial uses.

The site is entirely within an ECA Liquefaction area; however, the general development standards that apply to development on parcels containing environmentally critical areas do not apply to liquefaction prone areas (SMC 25.09.100).

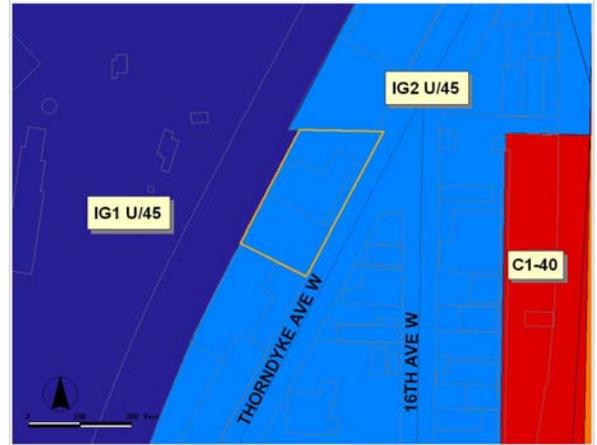


Figure 2. Zoning Map (2006).

### Proposal Description

The applicant proposes to change the use of the existing structure from warehouse and office to light manufacturing, and expand the use by 31,631 square feet, for a total of 45,631 square feet. The proposal includes the following:

- Renovation of the existing 14,000 square foot existing warehouse and office building;
- Addition of 11,354 square feet of below-grade level parking to accommodate 33 parking spaces (featuring approximately 900 cubic yards of excavation);
- Addition of 20,463 square feet of ground-level warehouse;
- Addition of 11,168 square feet of office space.

### Public Comments

Public notice of this application was issued on February 1, 2007 and ended February 14, 2007. No public comments were offered.

### ANALYSIS - SEPA

Environmental review resulting in a Threshold Determination is required pursuant to the Seattle State Environmental policy Act (SEPA), WAC 197-11, and the Seattle SEPA Ordinance (SMC Chapter 25.05).

The initial disclosure of the potential impacts from this project was made in the annotated environmental checklist (dated December 19, 2006), and supplemental information in the project file submitted by the applicant's agent, including a geotechnical report (prepared by Adapt Engineering, Inc., dated March 15, 2007). The information in the checklist, the supplemental information, 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 clarifies the relationship between codes, policies, and environmental review (SMC 25.05.665 D). 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

mitigation can be considered (SMC 25.05.665 D 1-7). 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 increased dust and other suspended air particulates during construction; increased noise and vibration from construction operations and equipment; and increased traffic and parking demand from construction personnel. These impacts are not considered significant because they are temporary and/or minor in scope.

Several adopted codes and/or ordinances provide mitigation for some of the identified impacts. 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 ECA Ordinance and Director's Rule 33-2006, *General Duties and Responsibilities of Geotechnical Engineers*, regulate development and construction techniques in designated ECA areas with identified geologic hazards. The Building Code provides for construction measures and life safety issues. Compliance with these applicable codes and ordinances will reduce or eliminate most short-term impacts to the environment and no further conditioning pursuant to SEPA policies is warranted.

### Long-term Impacts

Long-term or use-related impacts anticipated by the proposal would primarily consist of increased traffic volumes and site stability, and vehicular traffic. These long-term impacts are not considered significant because the impacts are minor in scope. However, these impacts warrant further discussion and review.

### Earth/Soils

The ECA Ordinance and Director's Rule 33-2006 require submission of a soils report to evaluate the site conditions and provide recommendations for safe construction in areas with landslide potential and/or a history of unstable soil conditions. The applicant has submitted "Seismic Soil Classification Considerations", prepared by Adapt Engineering, Inc., and dated March 15, 2007.

The construction plans, including shoring of excavations as needed and erosion control techniques, are receiving separate review by DPD. Any additional information showing conformance with applicable ordinances and codes (ECA ordinance, The Stormwater, Grading and Drainage Control Code, Director's Rule 33-2006) 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 utilized; therefore, no additional conditioning is warranted pursuant to SEPA policies.

### Traffic

The proposed use would be a paper production company, consisting of warehouse, light manufacturing, and administrative office space. The applicant has stated that the proposed use would employ a total of 33 to 40 people. The total commute trips to and from work, employee trips to and from the site during the day, and deliveries would total approximately 85-90 vehicle trips per day, a large majority of which would occur at the start and end of the business day<sup>2</sup>.

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<sup>2</sup> Institute of Transportation Engineers. *Trip Generation*, Volume 2 of 3. 2003.

Pursuant to SEPA policies this level of increase in traffic volume does not warrant further analysis.

**DECISION - SEPA**

This decision was made after review by the responsible official on behalf of the lead agency of a 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 requirements of the State Environmental Policy Act (RCW 43.21C), including the requirement to inform the public 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 2c.

Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030 2c.

**CONDITIONS - SEPA**

None required.

Signature: (signature on file) Date: June 11, 2007  
Catherine McCoy, Land Use Planner  
Department of Planning and Development  
Land Use Services