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: 3007580

Applicant Name: Brenda Barnes

Address of Proposal: 1000 1st Avenue South

SUMMARY OF PROPOSED ACTION

Land Use Application to change 40,200 square feet of warehouse use to office (floors three through six). Existing office and retail on floors one and two to remain (Palmer Building). No change to adjacent one story building or surface parking (19 spaces).

The following approval is required:

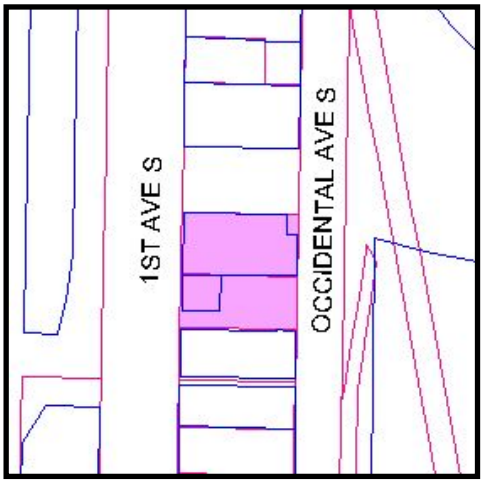
SEPA - Environmental Determination – Chapter 25.05, Seattle Municipal Code

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

BACKGROUND INFORMATION

Site and Vicinity Description

The project site consists of one parcel totaling approximately 12,000 sq. ft. of land located at 1000 – 1st Avenue South (the Palmer building) in Seattle, Washington. The parcel is currently developed with a vacant office and warehouse building, approximately 70,350 square feet in size. Parking spaces are provided to the north, south, east, and west of the existing building, which is bordered by Occidental Avenue South (to the east) and 1st Avenue South (to the west).



The topography of the site is generally flat, with grades descending from eighteen (18) feet, near the eastern portion of the site, to sixteen (16) feet to the east and west. The site is located relatively close to Elliot Bay and within a designated geologic hazardous area relative to the potential for soil liquefaction to occur during an earthquake.

The subject property is zoned Pioneer Square Mixed 85 feet to 120 feet. In this district, structure height over 85 feet to a maximum of 120 feet is permitted if a minimum of 75 percent of the gross floor area of the structure is in residential use. The adjacent parcels to the north and south of the subject property are similarly zoned PSM-85-120, while parcels adjacent to the east and west are zoned Industrial Commercial with height limits of 65 feet (IC-65). Qwest Field is located immediately to the east across Occidental Avenue South from the subject property.

Proposal

The applicant proposes to change approximately 40,200 square feet of established warehouse use to office (floors three through six). The existing office and retail space located on floors one and two will remain, as will the adjacent one-story building and the 19 existing surface parking spaces.

The application also proposes the renovation of the existing 70,350 square-foot building. The proposed renovation consists of new seismic braces with life safety upgrades, including new elevators, egress stairs, and restrooms. The site contains *Environmentally Critical Area (ECA) Liquefaction Soils* and is located in the Pioneer Square Preservation District. The application is subject to all *ECA* submittal and applicable development standards for *Liquefaction-prone Areas*, as provided in the Seattle Municipal Code (SMC) Section 25.09.100.

Public Comments

No comments were received during the two-week public comment period, which ended October 10, 2007.

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 (Seattle Municipal Code Chapter 25.05).

The proposal site is located in a liquefaction-prone critical area, thus the application is not exempt from SEPA review. However, SMC 25.05.908 provides that the scope of environmental review of projects within critical areas shall be limited to: 1) documenting whether the proposal is consistent with the City's Environmentally Critical Areas (ECA) regulations in SMC 25.09 and 2) evaluating potentially significant impacts on the critical area resources not adequately addressed in the ECA regulations. This review includes identifying additional mitigation measures needed to protect the ECA in order to achieve consistency with SEPA and other applicable environmental laws.

The initial disclosure of the potential impacts from this project was made in the environmental checklist submitted by the applicant dated August 27, 2007. The information in the checklist,

the submitted geotechnical engineering assessment, and the experience of the lead agency with 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, 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 some limitations. Under such limitations or circumstances (SMC 25.05.665 D) mitigation can be considered. Thus, a more detailed discussion of some of the potential impacts is appropriate.

Short-term Impacts

The following temporary or construction-related impacts are expected: 1) decreased air quality due to increased dust and other suspended air particulates during construction 2) increased noise and vibration from construction operations and equipment 3) increased traffic and parking demand from construction personnel. These impacts are not considered significant because they are temporary and/or minor in scope.

Compliance with existing ordinances, such as the Street Use Ordinance and the Noise ordinance will provide sufficient mitigation. The other impacts not noted here as mitigated by codes or conditions (e.g., increased traffic and parking demand from construction personnel) are not sufficiently adverse to warrant further mitigation by conditioning. These impacts are not considered significant; however, some of the impacts warrant further discussion and review.

Air Quality

Interior demolition and transport will create dust, leading to an increase in the level of suspended particulates in the air, which could be carried by winds out of the construction area. The Street Use Ordinance (SMC 15.22) requires watering the site, as necessary, to reduce dust. In addition, the Puget Sound Clean Air Agency (PSCAA regulation 9.15) requires that reasonable precautions be taken to avoid dust emissions. In addition to spraying water or chemical suppressants, this may require activities, which produce air-borne materials or other pollutant elements to be contained within a temporary enclosure. Demolition could require the use of heavy trucks and smaller equipment such as generators and compressors. These engines would emit air pollutants that would contribute slightly to the degradation of local air quality. Since the demolition activity would be of short duration, the associate impact is anticipated to be minor and does not warrant mitigation under SEPA.

Long-term Impacts

Long-term or use-related impacts anticipated by the proposal include: change of use from warehouse to office use, potential increased parking demand, and vehicular traffic. These long-term impacts are not considered significant because the impacts are minor in scope; however, some of the impacts warrant further discussion and review.

Historic Preservation

The Palmer building is located within the Pioneer Square Historic District and is not designated as a City Landmark.

The SEPA Overview Policy (SMC 25.05.665E), Relationship to Federal, State and Regional Regulations states that the City may defer to another agency with jurisdiction. The Pioneer Square Preservation District Ordinance was last revised by the Seattle City Council in 1996. This Ordinance allows for special land use and zoning controls and, in addition, requires review by the Pioneer Square Preservation Board.

Certificates of Approval are official notices issued by the Pioneer Square Preservation Board and the Director of the Department of Neighborhoods (DON). They are required before the City will issue permits for work that results in any change to the exterior appearance of any Pioneer Square District Structure, including façade alterations, new construction, demolition, or remodeling. They are also required before building use permits can be issued. The Pioneer Square Preservation Board can only issue such certificates after the MUP decision in published and the appeal period has expired. The applicant is working with the Pioneer Square Preservation Board to secure the required approvals.

The Pioneer Square Preservation District has jurisdiction in this case and compliance with their regulations will adequately mitigate impacts to this historic building. No SEPA conditioning is necessary.

Traffic

The proposed change of land will generate an increase in the total number of vehicle trips per day, as the proposed change of use will see approximately 451 people working in the building (estimate provided by applicant in Environmental Checklist, dated August 27, 2007).

William Popp Associates provided a Transportation Analysis memorandum, dated August 20, 2007, which includes a summary project description, trip generation analysis, and a distribution and assignment of project PM peak hour trips to the surrounding street system.

The project is estimated to generate 775 daily, 109 AM, and 105 PM peak hour trips to the surrounding street system utilizing the rates presented in the Seventh Edition of the ITE *Trip Generation Report*, 2001. When considering trip credit for the existing site uses potential trips, the net new trips to/from the site as a result of the change in building use is estimated to be 305 daily trips, 55 AM , and 51 PM peak hour trips.

DPD also requested, and was provided, a supplemental Traffic Analysis which including the level of service impacts from the subject property at selected off-site intersections for average weekday PM hour conditions. These intersections included First Avenue South/Royal Brougham Way and Royal Brougham Way/Occidental Avenue South. The impacts of the proposal during the PM peak hours at these intersections are estimated to be 48 trips and 59 trips respectively. The project percent of total entering vehicles is 1.26% at First Avenue/Royal Brougham Way and 4.7% at Royal Brougham Way/Occidental Avenue.

The City of Seattle maintains arterial corridors' levels of service (LOS) as a measure of average travel speed for through vehicles along an urban street. The City attempts to maintain a minimum LOS D threshold, corresponding with a 35-55 second average signalized intersection delay per vehicle. The LOS analysis indicates that Royal Brougham Way/Occidental Avenue intersection is currently operating at LOS B and is estimated to operate at LOS B with or without the project the proposed project. LOS B corresponds to 10-20 second average signalized intersection delay per vehicle.

The supplemental Traffic Analysis also investigated the level of impact that would be generated during weekday games held at Safeco Field. This quantitative and quantitative analysis determined that traffic generated from the proposed project would not significantly contribute to the conditions observed prior to and after games held on weekdays at Safeco Field.

John Shaw, Senior Transportation Planner with DPD, has reviewed the provided Traffic Analysis and supplemental Traffic Analysis and supports the determination that traffic-related impacts are not considered significant under SEPA (SMC 25.05.675.R).

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 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. An EIS is required under RCW 43.21C.030(2)(C).

CONDITIONS – SEPA

Prior to Issuance of the Master Use Permit

1. A Certificate of Approval from the Pioneer Square Preservation Board is required and shall be provided to DPD prior to the issuance of the MUP.

Signature: (signature on file) Date: November 12, 2007
Mike Reid, Land Use Planner
Department of Planning and Development

MR:lc

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