



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: 3007914
Applicant Name: Seattle Public School District
Address of Proposal: 10750 30th Avenue Northeast

SUMMARY OF PROPOSED ACTION

Land Use Application to allow additions and alterations to existing institution (Nathan Hale High School) in an environmentally critical area. Project includes 14,700 sq. ft. addition to the main building. Review includes demolition of existing library (10,520 sq. ft.), a portion of existing principal structure (670 sq. ft.), and five portables for a total of 18,400 sq. ft. of demolition. Fourteen portables to be temporarily located on site. Select parking areas to be re-striped and/or re-paved to provide 289 parking spaces. Determination of Non-Significance prepared by the Seattle Public Schools.*

*Note: The project description has been revised from the original notice of application: “Land Use Application to allow additions and alterations to existing institution (Nathan Hale High School) in an environmentally critical area. Project includes 14,700 sq. ft. addition to main building. Review includes demolition of existing library (10,520 sq. ft.), a portion of existing principle structure (670 sq. ft.), and four portables for a total of 15,700 sq. ft. of demolition. Select parking areas to be re-striped and/or re-paved to provide 292 parking spaces. Determination of Non-Significance prepared by Seattle Public Schools.”

The following approvals are required:

SEPA – Environmental Determination - For conditioning only
Chapter 25.05, Seattle Municipal Code.

Development Standard Departure – To approve or condition the following departure (SMC 23.79):

1. To allow less than required on-site parking – SMC 23.44.017.E
(Required 24 new, Proposed 5)

SEPA DETERMINATION: [] Exempt [X]¹ DNS [] MDNS [] EIS
[X] DNS with conditions
[] DNS involving non exempt grading or demolition or involving another agency with jurisdiction.

¹Environmental Documents prepared and SEPA Threshold Determination of Non-Significance issued by Seattle School District on February 20, 2008.

BACKGROUND INFORMATION

Site and Vicinity Description

The Nathan Hale High School Campus encompasses approximately 18.18 acres located in a Single Family 7200 (SF 7200) zone. This Campus is bounded on the west by 30th Avenue Northeast, on the north by Northeast 110th Street, on the east by 35th Avenue Northeast, and on the south by the Meadowbrook Playfield and the south fork of Thornton Creek. The school site consists of a main two-story 250,000 square foot (sq. ft.) building comprising of a performing arts auditorium, library, commons areas, gymnasiums, classrooms, offices and a Seattle Parks and Recreation (“Parks”) teen center; a lighted synthetic-surfaced athletic field with grandstand seating; and several detached portable classrooms and one (1) building which is leased to North Seattle Community College (daycare center).

The subject site also comprises four (4) onsite surface parking areas; south parking lot (136 stalls), maintenance parking lot (16 stalls), north parking lot (74 stalls) and the east parking lot (58 stalls). Vehicular access to these parking areas is via several curb cuts along 30th Avenue Northeast and Northeast 110th Street. Additionally, this property abuts 35th Avenue Northeast but no vehicular access occurs via this street. Both 30th Avenue Northeast and Northeast 110th Street are considered Collector Arterials and 35th Avenue Northeast is considered a Secondary Arterial, pursuant to SMC Chapter 23.53. Sidewalks, curbs and street trees exist along that portion of all three (3) streets that abut the Nathan Hale property. Bus loading zones occur on the west side of Northeast 110th Street and north side of 35th Avenue Northeast, both adjacent to the school property.

The topography on this site is relatively flat. The South Branch of Thornton Creek is located on the southernmost section of the site, flowing in a west to east direction. The riparian area parallel to South Branch Thornton Creek is relatively flat; however, directly above the ordinary high water mark (OHWM) the riparian area encompasses a relatively steep bank. Five (5) pedestrian bridges cross the stream on the District site which ultimately connects to paths leading to the adjacent Parks site. The stream widens beneath these bridges. Deposits of gravel and sand have formed sandbars in a portion of the stream under some of the bridges.

Areas on the site have been identified as Environmentally Critical Area (ECA)-Riparian Corridor, Wetlands, Liquefaction and Flood Prone. The applicant has been granted a limited exemption (#6151599) to allow for specific activity in the Riparian Management Area considered exempted under SMC 25.09.045.I, “*Normal and routine operation, maintenance, remodeling, repair, and removal of existing public facilities and utilities is exempt.*”: However, ECA review is still required for other portions of the project. During the review of this application, DPD staff also considered the applicant’s request to allow additional activity associated with the erection of temporary portables within the 75’ setback from the stream. The outcome of this request is discussed further in this report.

Surrounding properties to the west, east, north and south of the subject property are also zoned SF 7200. Existing developments in vicinity of the subject site are as follows: single family residences to the north, east and west; Summit (K-12) Public School directly across the street to the north; and a City-owned facility (Meadowbrook Playfield) to the south.

Summit School has a theater and three (3) athletic fields. The Meadowbrook Playfield comprises of three (3) grass baseball/softball athletic fields, tennis courts, community center and a pool. A memorandum of agreement stipulating an exchange of schedules, avoidance of multiple concurrent major events and staggered start times involving the Summit, Nathan Hale and Meadowbrook sites exists between the District and Parks.

Proposal

The Seattle School District (District) proposes modernization and renovation of Nathan Hale High School as part of the Building Excellence Phase III Capital Improvement Program. A total of 18,400 sq. ft. of structure is proposed to be removed. Demolition of portions of the main building (approximately 10,520 sq. ft. of the existing 1971 library and 670 sq. ft. of the existing 1962 building), one (1) ancillary structure (daycare center) and removal of five (5) portables is proposed. A covered walkway measuring 4,300 sq. ft. and the existing chimney stack will also be removed.

Approximately 204,000 sq. ft. of the existing two-story building will be extensively renovated. This substantial alteration includes seismic upgrades and modernization of the existing facility including new mechanical and electrical systems, new finishes, exterior façade, accessibility upgrades; and reconfiguration of interior spaces such as the classrooms, administration, student, and gymnasium areas. An expansion of the existing student commons area with a new kitchen and servery is also planned. No alterations to the existing performance arts theater and that portion of the building leased to Parks (Teen Center) are proposed.

A new one-story, 14,700 sq. ft. addition will be constructed between the print shop building and the existing 1962 building, situated west of the athletic field. The addition and renovated print shop building will house a new library, visual arts/radio/TV classrooms, weight room and an east facing lobby connecting the school building with the athletic fields.

The project includes the addition and reconfiguration of parking stalls in existing onsite surface parking areas. A summary of the parking count changes are identified in the table below.

Parking areas	Existing Stalls	Proposed Stalls	Change in Stall Count
South	136	136	0
North	74	83	9
East	58	60	2
Maintenance	16	10	-6
Total Parking	284	289	5

One (1) curb cut along Northeast 110th Street currently providing access to the East parking area is proposed to be reduced from 25' to 22' in width. No new vehicular entrances to onsite parking are proposed.

Excavation of approximately 700 cubic yards (cu. yds.) of material and infill of approximately 130 cu. yds. of new material is anticipated to occur during the construction of the foundation for the new addition.

New landscaping including plantings in parking areas, courtyards, building entrances and around the perimeter of the main building is proposed. All proposed landscaping located within the identified 100' Riparian Management Area will be of native species. New pedestrian walkways will also be created throughout the site.

Additional Information

In the 2007-2008 school year, approximately 1,125 students and 60 peak-hour workers (teachers, staff, etc.) attended Nathan Hale. The total capacity of the school, as slated in the Seattle School District Facility Master Plan, is 1,423 students. Per the applicant, "enrollment could increase to 1,400 students in the next two (2) to five (5) years according to the new District assignment plan and a corresponding but minimal increase in staff (71 total) would occur".

Construction activity is slated to begin in summer of 2008 and is expected to last for approximately thirty-six (36) to forty (40) months. During this time, students and faculty will remain on campus during construction and no academic programs are planned to be moved offsite; however, areas on campus must be restricted from the school population to allow for construction staging and portions of the building must be vacated during renovation and construction of the proposed addition. District's strategy to deal with this concern is to complete the entire proposal in two (2) major phases, Project 1 and Project 2. The Project 1 phase involves selective demolition; work associated with the construction of the addition; and renovation of the existing print shop building. The Project 2 phase will include all remaining work associated with the existing school renovation and site improvements. Both phases involve the erection of fourteen (14) temporary pre-fabricated portable structures to accommodate displaced classrooms/offices/storage areas currently located in the school; and parking impacts associated with the closure of parking areas and parking compromised by the placement of the temporary portables in existing paved parking areas. These impacts are discussed in detail under the SEPA analysis in this document.

Public Comments

The required public comment period ended on March 20, 2008. DPD received one (1) written comment regarding this proposal. The constituent cited concerns about parking impacts, erosion impacts to Thornton Creek, asbestos concerns and safety issues related to the seismic retrofit.

Development Standard Departure Committee Meeting

One (1) public meeting of the Development Standard Departure Advisory Committee ("Advisory Committee") was held on March 13, 2008 to consider development standard departures for the school proposal. The Department of Neighborhoods prepared and submitted a report to document public testimony and make recommendations to DPD for modifications to land use code development standards. The report contains a majority report, committee minutes and public comments. Public comments at the meeting focused on questions regarding future parking availability associated with the athletic field usage in combination with school events, critique of the parking analysis and criticism of the public notification process. For further detail, this report is available at DPD in the Master Use Permit file for this project.

ANALYSIS – Development Standard Departure

The Development Standard Departure process is being conducted pursuant to the provisions of Seattle Municipal Code sections 23.79.002-.012. Pursuant to these provisions an Advisory

Committee was convened, public comment was received, and a written recommendation to the Director of DPD was made. This analysis and decision is made pursuant to the requirements of SMC section 23.79.010 that the Director determine the amount of departure to be allowed as well as mitigation measures to be imposed. The Director's decision shall be based on an evaluation of the factors set forth in Section 23.79.008, the majority recommendations and minority reports of the Advisory Committee, comments at the public meeting(s) and other comments from the public. If the Director of DPD modifies the recommendations of the Advisory Committee, the reasons for the modification shall be put forth in writing.

In reviewing the departure request, Section 23.79.008 directs the Advisory Committee to “gather and evaluate public comment”, and to “recommend maximum departures which may be allowed for each development standard from which a departure has been requested”. It states, “Departures shall be evaluated for consistency with the objectives and intent of the City’s Land Use Code....., to ensure that the proposed facility is compatible with the character and use of its surroundings”. The Advisory Committee is directed to consider and balance the interrelationships among the following factors:

- A. Relationship to Surrounding Areas:** *The advisory committee shall evaluate the acceptable or necessary level of departure according to:*
1. *Appropriateness in relation to the character and scale of the surrounding area;*
 2. *Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale;*
 3. *Location and design of structures to reduce the appearance of bulk;*
 4. *Impacts on traffic, noise, circulation and parking in the area; and*
 5. *Impacts on housing and open space.*

More flexibility in the development standards may be allowed if the impacts on the surrounding community are anticipated to be negligible or are reduced by mitigation; whereas, a minimal amount or no departure from development standards may be allowed if the anticipated impacts are significant and cannot be satisfactorily mitigated.

- B. Need for Departure:** *The physical requirements of the specific proposal and the project’s relationship to educational needs shall be balanced with the level of impacts on the surrounding area. Greater departures may be allowed for special facilities, such as a gymnasium, which are unique and/or integral and necessary part of the educational process; whereas, a lesser or no departure may be granted for a facility which can be accommodated within the established development standards.*

Departure Request and Advisory Committee Recommendation

In November 2007, the Seattle School District requested the Director to initiate the departure process for Nathan Hale High School. One (1) departure was requested. That departure being from required onsite parking quantity. There are currently 284 onsite parking spaces. After the completed modernization of Nathan Hale, the proposed onsite parking will be increased by five (5) parking stalls to result in 289 parking stalls in total. The creation of the commons area (2,320 sq. ft.) within the existing main building increases the required onsite parking to 313 parking stalls. Therefore, a departure for a waiver from twenty-four (24) required onsite parking spaces is necessary. Table A describes the proposed departure request based on plans submitted to DPD.

Development Standard	Required/Allowed	Proposed
Parking Quantity 23.54.15	313 parking spaces	289 parking spaces

The Advisory Committee met on March 13, 2008. At the meeting, the Advisory Committee determined that the requested departure was MINOR in nature. During this same meeting the Advisory Committee listened to public comment and recommended APPROVAL of the above mentioned departure subject to the following conditions:

1. Install low speed bumps in all parking areas.
2. Install pattern pavers that are pervious at athletic field parking lot pedestrian crossing as safety measures.
3. Whenever possible when removing asphalt, replace with appropriate pervious paving.
4. Educate staff, teachers, parents and students about existing onsite parking lots and access to underutilized lots.
5. The Seattle Public Schools will work with Seattle Department of Transportation to discuss the implementation of pedestrian crossing safety features along Northeast 110th Street.
6. Seattle Public Schools and the construction company will install signage before/during the phased construction directing staff, teachers, parents and students to additional parking at Summit School (Jane Adams).

Details of the recommendation and discussion concerning the conditions were captured in a May 2008 report prepared by the Department of Neighborhoods (DON) and forwarded to DPD.

Director's Analysis

A. Relationship to Surrounding Areas:

1. *Appropriateness in relation to the character and scale of the surrounding area;*
The new parking is located on portions of the site where parking already exists. It is not expected to impact surrounding areas.
2. *Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale;*

This request for a reduction in the number of onsite parking spaces does not involve the erection of structures for this use. Therefore, this criterion does not directly apply to this request.

3. *Location and design of structures to reduce the appearance of bulk;*

This parking departure request does not involve the erection of structures for this use. Therefore, this criterion does not directly apply to this request.

4. *Impacts on traffic, noise, circulation and parking in the area; and*

Currently there are 284 parking spaces situated amongst four (4) onsite surface parking areas. Expansion of the commons area (2,320 sq. ft.) within the existing

school structure will require parking for 313 vehicles, which is based on one (1) parking stall per 80 sq. ft. of public assembly areas. The District proposal would increase the number of onsite parking from the current 284 spaces to 289 spaces.

Renovation of Nathan Hale and changes related to proposed parking configurations are not expected to result in an increase in traffic along roadways adjacent to the site. Current enrollment at the school is 1,125 students and 60 staff members. The modernized school would have the capacity for 1,400 students and 71 staff. Based on the facility capacity, the traffic analysis prepared by Mirai Transportation Planning & Engineering (dated February 8, 2008) indicates the projected levels of service (LOS) during peak hours (2:00 p.m. to 4:00 p.m.) are anticipated to remain at LOS B (minimal delays) except for the west driveway from the south parking lot leading onto 30th Avenue Northeast-which would decline to LOS F (severe congestion). The decline at the west driveway would last approximately 15 to 20 minutes and would affect people leaving the school via the west driveway; this would not affect the level of service on neighboring streets.

The transportation report also included a parking demand and utilization study. This study indicates that there will be a daily school parking demand of 289 parking spaces based on a future school capacity of 1,400 students and 71 staff members. The proposed 289 parking spaces equal the projected demand. Survey of parking conditions on adjacent neighboring streets indicate there will be more than adequate parking supply to meet the typical parking demand with this site. Therefore no major impacts to parking in the area are expected.

No increase in noise is expected to occur. Noise associated with pedestrians talking as they travel to and from parked cars and the sounds generated by the cars themselves would continue to be experienced in nearby residential areas in similar amounts and at similar times to the current conditions.

5. *Impacts on housing and open space.*

The parking departure does not have any impact on housing or open space.

B. *Need for Departure:* *The physical requirements of the specific proposal and the project's relationship to educational needs shall be balanced with the level of impacts on the surrounding area. Greater departures may be allowed for special facilities, such as a gymnasium, which are unique and/or integral and necessary part of the educational process; whereas, a lesser or no departure may be granted for a facility which can be accommodated within the established development standards.*

The Seattle School District Facilities Master Plan identifies the need to expand and modernize Nathan High School to accommodate a maximum student capacity of 1,423. The introduction of an increased student population requires the District to provide larger student commons areas within the school campus. New assembly areas must meet current development standards, including requirements for parking. In order to meet the program and design requirements adopted by the District, one (1) departure from the Land Use Code was required.

The Advisory Committee recommended departure from the required twenty-four (24) onsite parking with conditions previously identified in this document.

DPD finds the recommendation of the Department of Neighborhoods appropriate and approves the recommended departure from development standards with recommended conditions.

DECISION-DEVELOPMENT STANDARD DEPARTURE

The development standard departure to allow less than required onsite parking (a waiver of the twenty-four spaces required by the proposed commons expansion) is **conditionally granted**.

CONDITIONS-DEVELOPMENT STANDARD DEPARTURE

Conditions are listed at the end of this document.

ANALYSIS – SEPA

Environmental impacts of the proposal have been analyzed in environmental documents prepared by Seattle School District. These include a SEPA Checklist dated February 13, 2008 and a Determination of Non-Significance issued by Seattle School District dated February 20, 2008.

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, and must be reasonable and capable of being accomplished. This proposal is reviewed under that substantive SEPA authority.

The Department is reviewing the environmental impacts of the proposal in order to impose further conditions if necessary. Disclosure of the potential impacts from this proposal was made in the environmental documents listed above. This information, supplemental information provided by the applicant (plans, written descriptions of the project, geotechnical report, transportation and parking report, construction requirements and renderings) and the experience of this agency with review of similar proposals form the basis of this analysis and conditioning.

The SEPA Overview Policy (SMC 25.05.665) establishes the relationship between codes, policies, and environmental review. Specific policies for specific elements 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 certain limitations/circumstances, (SMC 25.05.665.D.1-7) 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 demolition and building activities and hydrocarbon emissions from construction vehicles and equipment; increased dust caused by construction activities; potential soil

erosion and potential disturbance to subsurface soils during grading, excavation, and general site work; increased traffic and demand for parking from construction equipment and personnel; loss of parking for students and staff; conflict with normal pedestrian movement adjacent to the site; increased noise; and consumption of renewable and non-renewable resources. Due to the temporary nature and limited scope of these impacts, they are not considered significant (SMC 25.05.794). Although not significant, these impacts are adverse and, in some cases, mitigation is warranted.

Several adopted City codes and/or ordinances provide mitigation for some of the identified impacts. Specifically these are: Stormwater, Grading, and Drainage Control Code (grading, site excavation, and soil erosion); Street Use Ordinance (watering streets to suppress dust, removal of debris, and obstruction of the pedestrian right-of-way); the Building Code (construction measures in general); Environmentally Critical Areas Ordinance (protection of water quality and soil stability in environmentally critical areas) and the Noise Ordinance (construction noise). Compliance with these applicable codes and ordinances will reduce or eliminate short-term impacts to the environment and, with the exception of noise and parking impacts, they will be sufficient without conditioning pursuant to SEPA policies. Further discussion of short term noise, air quality, earth, drainage, parking and construction traffic and parking related impacts follows.

Noise

The Nathan Hale site abuts three arterials; 30th Avenue Northeast, Northeast 110th Street and 35th Avenue Northeast. Residential properties are situated across the abovementioned streets; north, east and west of the project site. Vehicular noise, school bus traffic and voices from nearby outdoor facilities are cited as existing noise sources.

Short-term noise and vibration from construction equipment and construction activity (e.g., backhoes, trucks, concrete mixers, generators, pneumatic hand tools, engine noise, back-up alarms, etc.); demolition of the existing library and portable buildings; construction of the proposed addition and alterations; site work; and, construction vehicles entering and exiting the site would occur as a result of construction and construction-related traffic. Compliance with the Noise Ordinance (SMC 25.08) is required and will limit construction noise, registering 55 dB(A) or more at the receiving property line or a distance of 50 feet from the equipment, to the hours between 7:00 a.m. and 10:00 p.m. on weekdays, and between 9:00 a.m. and 10:00 p.m. on weekends and holidays. This level can be further reduced by 10 dB(A) between the hours of 10:00 p.m. and 7:00 a.m. during the weekdays, and between 10:00 p.m. and 9:00 a.m. on weekends where the receiving property lies within a residential district of the City (25.08.420). The use of impact construction equipment such as jackhammers, pile drivers and other loud noise emitters are restricted further in accordance with SMC 25.08.425.

To mitigate noise impacts resulting from demolition of various areas of the school and construction of the school additions with associated external and internal alterations, the SEPA checklist and Appendix E (Construction Requirements) of this same checklist notes the following mitigating elements of the proposal:

- All engines and engine-driven equipment used for hauling and construction would be equipped with a properly-sized and maintained muffler to prevent excessive or unusual noise.
- Construction equipment would be turned off during prolonged periods of non-use.

- Stationary equipment would be located away from site boundaries.
- All construction activity would be restricted to hours and decibel levels designated by the Seattle Noise Control Ordinance.

Although compliance with the Noise Ordinance is required, due to the proximity of the project site to nearby residential uses, additional measures to mitigate the anticipated noise impacts may be necessary. The SEPA Policies at SMC 25.05.675.B and 25.05.665 allow the Director to require additional mitigating measures to further address adverse noise impacts during construction. Pursuant to these policies, it is the Department's conclusion that limiting hours of construction beyond the requirements of the Noise Ordinance may be necessary on this site. Therefore, as a condition of approval, construction activities (including but not limited to demolition, grading, deliveries, framing, roofing, and painting) shall be limited to non-holiday weekdays from 7:00 a.m. to 6:00 p.m. Interior work that involves mechanical equipment, including compressors and generators, may be allowed on Saturdays between 9:00 a.m. and 6:00 p.m. once the shell of the structure is completely enclosed, provided windows and doors remain closed. Non-noisy activities, such as site security, monitoring, weather protection shall not be limited by this condition.

Construction activities outside the above-stated restrictions may be authorized by the Land Use Planner when necessitated by unforeseen construction, safety, or street-use related situations. Requests for extended construction hours or weekend days must be submitted to the Land Use Planner at least three (3) days in advance of the requested dates in order to allow DPD to evaluate the request.

Air Quality

Demolition, grading and construction activities each may create adverse air quality impacts in the surrounding area. It is the City policy to minimize or prevent adverse impacts resulting from toxic or hazardous materials and transmissions. The Seattle Stormwater, Grading and Control Code (SMC 22.800-22.808) regulates onsite grading activities and requires soil erosion control techniques be initiated for the duration of work. The Puget Sound Clean Air Agency (PSCAA) has local responsibility for regulation and permitting of stationary sources (i.e. power plants), construction emissions and the removal of hazardous materials such as asbestos.

The SEPA checklist notes that preliminary results from a hazardous material survey conducted on portions of the existing main building and portables to be demolished indicate the presence of asbestos-containing materials, lead-containing paints (LCP), and above and below ground storage tanks. The following measures are cited in the SEPA checklist and Appendix E (Construction Requirements) to reduce or control emissions during construction:

- Site-specific development would comply with PSCAA's regulations concerning construction activity.
- Prior to demolition of the portables and the remodel of the gymnasium, identified asbestos-containing materials will be abated in compliance with applicable local, state and federal regulations and will utilize work practices and engineering controls to prevent migration of elevated fiber concentrations from regulated work areas. The contractor will be required to be trained and licensed in the abatement work. Other hazardous materials identified in the final hazardous materials survey, including PCB-containing light ballast, mercury-containing fluorescent light tubes, lead-containing paint, and/or fuel oil in the storage tanks,

will be removed by certified firms as required by regulations and will be disposed of at an approved disposal site.

Existing regulations are sufficient to control short-term air quality impacts. However, since students and staff will continue to populate the school/campus during the duration of the construction activity, it is of utmost importance that PSCAA be notified prior to start of work. This is accomplished by filing a Notice of Intent to demolish with that agency. Therefore, as a condition of approval prior to demolition, the proponent will be required to submit a copy of the required PSCAA Notice to DPD. If asbestos is present on the site, PSCAA, the Department of Labor and Industry, and EPA regulations will provide for the safe removal and disposal of the material.

Earth

The ECA Ordinance and Directors Rule (DR) 3-2007 require submission of a soils report to evaluate the site conditions and provide recommendations for safe construction in areas with steep slopes, liquefaction zones, and/or a history of unstable soil conditions. Pursuant to this requirement the applicant submitted a Geotechnical Engineering Report prepared by Erik O. Anderson, P.E. (HWA Geosciences Inc.) dated November 1, 2007. The report evaluates the soil and site conditions and provides recommendations for erosion and drainage controls, grading, earthwork, foundation construction, slab-on-grade support and retaining walls.

The summary of the Geotechnical Engineering Report findings is the following: "The proposed building area is underlain by loose to dense granular fill and alluvium, over medium stiff to very stiff clays and silts, over very dense advance outwash sands. Shallow ground water is perched within the granular alluvium above the lacustrine deposit across the site. Our analysis run on the information obtained from borings BH-3 and BH-4, the vicinity of the proposed new library area, indicate that the soils are not generally susceptible to earthquake induced soil liquefaction. However, due to the heavy loads associated with this structure, we recommend that the library be supported on deep foundations extending down into the very dense, advance outwash soils. Based on our previous explorations for the Performing Arts Center, ground water within the advance outwash is confined under moderate artesian pressure by the lacustrine silt and clay aquitard. Penetrations of the lacustrine layer, unless adequately sealed, could result in artesian seepage at the ground surface. We recommend auger-cast concrete piles for foundation support. A properly constructed auger-cast pile will provide for intimate contact between the structural grout and the surrounding soil and, in our opinion, will minimize the potential for ground water flow from the lower artesian zone." The submitted report, which is located in the project file, further details the specific requirements for proper installation of foundations; pavements; floor slabs; drainage; excavations; grading techniques; site preparation and seismic considerations.

A DPD Geotechnical Engineer has reviewed the abovementioned soils report in association with submitted plans and has deemed this soils report to be relatively complete for this proposal. The soils report, construction plans, and shoring of excavations as needed, will be reviewed again by the DPD Geotechnical Engineer and Building Plans Examiner who will require any additional soils-related information, recommendations, declarations, covenants and bonds as necessary to assure safe grading and excavation. This project constitutes a "large project" under the terms of the Stormwater, Grading and Drainage Control Code (SGDCC) (SMC 22.802.015 D). As such, there are many additional requirements for erosion control including a provision for implementation of best management practices and a requirement for incorporation of an engineered erosion control plan which will be reviewed jointly by the DPD building plans examiner and geotechnical engineer

prior to issuance of the permit. The SGDCC 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.

Drainage

Section 25.05.675.C of the SEPA code describes the City's policies for protecting riparian corridors. *"Pollution, mechanical damage, excessive flows, and other conditions in drainage basins will increase the rate of down-cutting and/or the degree of turbidity, siltation, habitat destruction, and other forms of pollution in wetlands, riparian corridors and lakes....The aesthetic quality and educational value of the water or watercourses, as well as the suitability of waters for contact recreation and wildlife habitat, may be destroyed....Authority provided through the Grading and Drainage Control Ordinance and the Environmentally Critical Areas Ordinance is intended to achieve mitigation of drainage impacts in most cases, although these ordinances may not anticipate or eliminate all impacts."*

South Branch Thornton Creek is an existing stream that flows east along the south boundary of the property and is situated between the school structure and the south parking lot. This creek is identified as a riparian watercourse per the ECA ordinance (SMC 25.09.020). The riparian management area is defined as, *"the area within 100' measured horizontally landward from the top of each bank of the watercourse, or from ordinary high water mark (OHW) of the watercourse as surveyed in the field, if the top of the bank cannot be determined"*. Per the submitted plans, pedestrian bridges, underground utilities, paved parking areas (south, east and maintenance parking lots), one (1) portable building (day care center), raised planters, playground area and a portion of the main school structure are currently located within the riparian management area. The ECA code dictates that development is not allowed within the riparian management area unless certain exemptions are granted.

As mentioned earlier in this document, a limited ECA exemption (#6151599) was granted December 2007 to allow for specific activity in the Riparian Management Area that was considered under SMC 25.09.045.I to be, *"Normal and routine operation, maintenance, remodeling, repair, and removal of existing public facilities and utilities....when these activities do not result in substantial disturbance to the environmentally critical areas or buffers"*. This same exemption identified the placement of temporary portables outside of the 75' setback from the stream. However, since the exemption was approved, it was found that additional portables (3) will need to be temporarily situated within the 75' setback area on the existing paved south parking lot. Certain measures such as temporary fencing between the portables and the stream in order to restrict activity in the corridor have been proposed. However, further mitigation is necessary to insure this area will be restored back to its original state or in an enhanced condition once construction has ended. SEPA provides authority to mitigate impacts to riparian corridors (SMC 25.05.675.C.2.c.). Therefore, as a condition of approval, prior to final occupancy of the building, all portables located within the riparian management area must be removed and the area must be restored back to its original state and/or restored as pervious surface with native planting as identified by plan.

Parking

Construction is planned to occur in two (2) major phases identified as Project 1 and Project 2. The District's decision to keep the school in operation during construction necessitates the need to erect fourteen (14) pre-fabricated portables on the campus to be used as temporary classrooms, offices or

storage as the need arises. The portables will be situated at the three (3) existing paved parking areas. As a result, certain parking spaces will be inaccessible and some parking areas will be reconfigured. Additionally, one (1) parking area will be closed to the public during the duration of construction. Due to planned construction phasing, the District has indicated that all portables will not be placed simultaneously onsite-but at various times during the project phases. Ultimately, existing onsite parking supply will be reduced from 284 spaces to 116 spaces. The table below identifies the affected parking areas and summarizes affected parking amounts.

Parking Areas	Portable Amount	Existing Parking Spaces	Parking Spaces Temporarily Restricted	Parking Space Amount Available
East Parking Lot	4	58	58	0 (closed for public)
North Parking Lot	4	74	32	42
South Parking Lot	6	136	78	58
Maintenance Parking Lot	0	16	0	16
TOTAL	14	284	168	116

SEPA provides authority to mitigate the effects of development in an area on parking. Section 25.05.675.M of the SEPA code states, “*Parking regulations to mitigate most parking impacts and to accommodate most of the cumulative effects of future projects on parking are implemented through the City’s Land Use Code. However, in some neighborhoods, due to inadequate off-street parking, streets are unable to absorb parking spillover.*” In this case, approximately 168 parking spaces will be temporarily displaced and would ultimately cause parking spillover onto neighboring streets. To mitigate parking impacts resulting from the placement of portables over existing parking spaces, the District proposes to designate thirty (30) parking stalls at the Summit (K-12) school parking lot located across Northeast 110th Street for Nathan Hale staff and students. The District expects that the remaining 138 parking supply would be accommodated on streets within the neighborhood. The parking utilization study prepared by Mirai indicates there is currently a large supply of available parking (820) within 0.2 miles of the school campus to meet the identified parking demand.

DPD concurs that adequate parking is available for school use during school hours. Based on the Memorandum of Agreement, the District is required to coordinate with Parks on scheduling major events for large groups of people. Per the applicant, the District will coordinate with Parks concerning the scheduling of recreational events that will be impacted. DPD is concerned that the submitted plans don’t identify proposed parking areas on the Summit campus designated for Nathan Hale use. Additionally, it is of utmost importance that the current onsite parking areas be restored back to original parking supply amounts immediately after the end of has been finished. Therefore, in order to insure that the identified short-term impacts are mitigated adequately, the MUP drawings must reflect at a minimum thirty (30) parking spaces for Nathan Hale staff/student use and the temporary portables must be removed from the school property prior to final occupancy.

Construction-Related Streets, Parking and Pedestrian Circulation

This proposal includes demolition and onsite excavation/grading. The Street Use Ordinance includes regulations which mitigate dust, mud and circulation. Any temporary closure of the sidewalk and/or traffic lane(s) is controlled with a street use permit through the Seattle Department

of Transportation (SDOT.) It is the City's policy to minimize or prevent adverse traffic impacts which would undermine the stability, safety, and/or character of a neighborhood or surrounding areas (25.05.675 R).

The District indicates the construction period for the project would last for up to forty (40) months. During this time period, it is estimated there will be a few weeks of very intense construction traffic while other days will have minimal traffic. Submitted documents don't clearly address what estimated traffic levels would be.

The District estimates that a maximum of fifty (50) construction workers will be onsite during Project 1 and up to a maximum of 100 construction workers will be working onsite at any given time during the Project 2 phase. It is anticipated that future contractors will use the existing driveway along Northeast 110th Street leading to the east parking lot which will be closed to the public for the duration of the construction project. Most of this area will be dedicated for use by the construction employees for limited parking, storage, deliveries, lay-down areas, staging, access to the building and other related construction uses. Construction flaggers may be used (as needed) at Northeast 110th Street or 30th Avenue Northeast to assist vehicles approaching and leaving the site.

As mentioned, some dedicated construction employee parking will be provided onsite. However, since the school will remain occupied during the school year, it is expected that construction vehicle parking will occur on surrounding neighborhood streets. Based on the parking utilization survey results, there would be adequate parking supply (820) within a .2 mile radius from the school to accommodate the construction related demand. However, there is a concern that the submitted MUP plans don't clearly indicate nor quantify the amount of dedicated onsite parking for construction staff. Nor do the plans identify a temporary pedestrian circulation plan for students/staff impacted while attending classes in the temporary portables situated in the east parking lot area.

Construction activities may result in obstacles to pedestrians and bicyclists. Similarly, traffic lanes and on-street parking may be affected by construction staging, deliveries, etc. Adverse impacts are not adequately mitigated by existing City codes nor has the District specifically identified the City agency responsible for receiving and enforcing the approved parking and traffic control plan. Thus, additional mitigation is warranted pursuant to the Construction Impacts Policy (SMC 25.05.675 B). A construction-phase transportation plan addressing street and sidewalk closures, construction employee parking, as well as truck routes and hours of truck traffic will be required to mitigate identified impacts.

Long-Term Impacts

Long-term or use-related impacts anticipated from the proposal include: increased parking demand; possible increased traffic demand; possible increase in light and glare; increased bulk and scale of the building; and possible increased ambient noise due to increase in human activity.

Several adopted City codes and/or ordinances provide mitigation for some of the identified impacts. Specifically these are: The Stormwater, Grading and Drainage Control Code which requires on site collection of stormwater with provisions for controlled tightline release to an approved outlet and may require additional design elements to prevent isolated flooding; and the Land Use Code which controls site coverage, setbacks, building height and use and contains other

development and use regulations to assure compatible development. Compliance with these applicable codes and ordinances is adequate to achieve sufficient mitigation of most long-term impacts. However, the proposal represents a substantial renovation of an existing public high school. Therefore additional discussion regarding historic preservation, traffic and parking is warranted.

Historic Preservation

Section 25.05.675 H of the SEPA code describes the City's policies for protecting historical sites. *"It is the City's policy to maintain and preserve significant historic sites and structures and to provide opportunity for analysis of archeological sites.....For projects involving structures or sites which are not yet designated as historical landmarks but which appear to meet the criteria for designation, the decisionmaker or any interested person may refer the site or structure to the Landmarks Preservation Board for consideration.....On sites with potential archaeological significance, the decisionmaker may require an assessment of the archaeological potential of the site."*

SEPA provides authority to mitigate impacts to historic buildings (SMC 25.05.675.H.2.c). In this instance, the existing public school is not designated as a historical landmark. However, because this proposal involves the demolition and renovation of a structure which is more than 50 years old, the District submitted a Landmarks Nomination application (which included a Historic Value Report prepared by Adolfsen (2007)) to the Department of Neighborhoods (DON) Landmark Preservation Board in June 2008. At the July 2, 2008 meeting of the City's Landmarks Preservation Board, the Board voted to deny the designation of Nathan Hale High School.

Traffic

Mirai Transportation Planning & Engineering prepared a Parking and Traffic Analysis Report (dated February 8, 2008) for this proposal-referenced in the report as the "Nathan Hale High School Modernization". This report is divided into three (3) major sections: section one (1) describes current traffic and parking conditions; section two (2) describes the estimated future traffic and parking conditions in the study area; and section three (3) explains potential mitigation. The analysis in this report is based on the planned increase of the student population at Nathan Hale from 1,125 to 1,400.

The following roadways are adjacent to the proposed site:

- 30th Avenue Northeast is a two-way, north-south roadway. It is classified as a Collector Arterial by the City of Seattle. This roadway allows for two-way access. No parking is allowed along the west side of the street on school days during 8:00 am to 5:00 pm.
- Northeast 110th Street is a two-way, east-west roadway. It is classified as a Collector Arterial by the City of Seattle. This roadway has two (2) travel lanes. A bus loading zones abuts the school site along this street.
- 35th Avenue Northeast is a two-way, north-south roadway. It is classified as a Secondary Arterial by the City of Seattle. This roadway has two (2) travel lanes. A bus loading zones abuts the school site along this street.

King County Metro Route 65 provides direct service to Nathan Hale. The nearest transit stop is adjacent to Nathan Hale, along 35th Avenue Northeast. Additional Metro Routes that travel along Lake City Way (64, 72, 306, 312, and 372) provide service within the immediate vicinity.

The traffic volume resulting from this project was estimated by using the *Institute of Transportation Engineers (ITE) Trip Generation Manual (7th edition)* for the category of “High School”. The report states the increase in student population from 1,125 to 1,400 students in the future would generate approximately 470 net new daily trips, of which 77 new trips would be generated during the PM peak hour (2:00 p.m. to 4:00 p.m.). Per the report, “Out of the approximately 77 additional vehicular trips during the school peak hour, 25 trips would occur at the northwest driveway (4 entering and 10 existing trips); 13 would occur at the student driveway (4 entering and 9 exiting trips); 50 would occur at the field driveway (15 entering and 33 exiting trips)”.

The transportation report identified four (4) intersections for analysis during the weekday PM peak hour (2:00 p.m. to 4:00 p.m.) for operational characteristics. The table below illustrates each intersection’s existing level-of-service (LOS) and forecasted LOS with the proposed project. The identified delays are divided into several grade levels, ranging from LOS A (minimal) to LOS F (long delays).

Intersection	Existing LOS (1,125 Students)	Future LOS (1,400 Students)
NE 110 th Street/30 th Avenue NE	A	B
NW Driveway/30 th Avenue NE	B	B
NE 107 th Street/30 th Avenue NE (W. Driveway access)	E	F
Field Driveway/30 th Avenue NE	B	B

The LOS analysis indicates all of the studied intersections will operate at LOS B except for the west driveway, which would further decline from LOS E to LOS F during peak hours. Per the report the decline at the west driveway would last approximately 15 to 20 minutes and would affect people leaving the school via this driveway; this would not affect the level of service on neighboring streets.

In summary, the proposed project in conjunction with the forecasted increase in student enrollment at Nathan Hale High School would result in a net increase in overall traffic volumes at the site compared to existing conditions. Overall, it is forecasted that a small increase in traffic delay would occur and exiting from the south parking lot (“west driveway”) would be further impacted; however, this impact corresponds with the school’s dismissal and is of only 15 to 20 minutes in duration. Understandably, students/staff exiting this parking area would be inconvenienced but this would occur for a short duration of time and the extent of this delay will not be noticed by most drivers traveling on neighboring streets. Therefore, no SEPA mitigation of traffic impacts is warranted.

Parking

There are currently 284 parking spaces onsite distributed amongst four (4) distinct surface parking lots; south parking lot (136 stalls), maintenance parking lot (16 stalls), north parking lot (74 stalls) and the east parking lot (58 stalls). Per the Land Use Code, expansion of the existing commons area within the school will require parking for 313 vehicles. The submitted MUP plans indicate a total of 289 surface parking spaces are provided. Vehicular access to the surface parking spaces will remain unchanged.

As described in the Mirai Parking and Traffic Analysis Report (dated February 8, 2008), a parking utilization study was conducted within approximately 0.2 miles of the school entrance with the intent to determine the number of parking spaces available and provide a base to determine parking occupancy rates. Studies were conducted the third week of school (September 17th -27th, 2007) between 1:00 p.m. to 2:00 p.m. A utilization study was also performed during the summer when school was not in session (August 27th-31st, 2007) between 1:00 p.m. to 2:00 p.m. so that a comparison could be made. The current parking supply within 0.2 miles of the school is approximately 820 spaces. The study found that parking throughout the neighborhood areas was typically light with parking on the streets immediately adjacent to the school varying between 0 to 40%. In comparison, parking demand during the typical school day showed a 75% parking utilization within the high school's parking lots and 12% to 32% parking utilization on streets surrounding the high school campus.

A parking demand analysis was included within the technical report to assess how the proposed number of parking spaces would match the anticipated parking demand for an expected future 1,400 student enrollment at Nathan Hale. Based on field results, the peak parking expected for the existing student population (1,125 students) is 212 parking spaces. Using *Institute of Transportation Engineer's (ITE) Parking Generation (3rd edition)* average demand rates for suburban schools, Mirai's analysis showed that 77 additional parking spaces would be required to meet the future parking demand for the additional 275 students. As a result, a total of 289 (212+77) parking spaces would be required to meet the peak parking demand.

In summary, it is estimated that there will be a total parking demand for 289 parking spaces during school hours. Since 289 surface parking spaces will be provided onsite, onsite parking should accommodate the expected increase in the parking demand and should not result in any additional spillover parking. If spillover parking does occur, the parking studies indicate that this parking could easily be accommodated on the neighboring streets. Therefore, SEPA conditioning is necessary.

DECISION - SEPA

The environmental checklist, Master Use Permit plans submitted on the project; and responses to requests for information all comprise Department of Planning and Development's (DPD) record. Pursuant to SMC 25.05.600.D.1, DPD relies on the environmental documents and technical reports prepared by the Seattle School District in their role as lead agency. DPD has determined that the DNS issued and utilized for the environmental analysis of the *Nathan Hale High School Renovation, Demolition and New Construction* and permitted herein, is adequate. The SEPA conditions listed below are imposed based on Master Use Permit (MUP) plans as well as on all environmental documentation submitted to date.

CONDITIONS - SEPA

Prior to Issuance of the Master Use Permit

1. The MUP drawings must reflect at a minimum thirty (30) parking spaces for Nathan Hale staff/student use and the temporary portables must be removed from the school property prior to final occupancy.

Prior to the Issuance of the Demolition Permit

2. The owner(s) and/or responsible party(s) will be required to submit a copy of the Puget Sound Clean Air Agency notice of construction. If asbestos is present on the site, PSCAA, the Department of Labor and Industry, and EPA regulations will provide for the safe removal and disposal of asbestos.

Prior to the Issuance of the Demolition or Building Permit

3. In order to address construction related transportation and parking impacts, the responsible party shall submit a Construction Transportation Management Plan (CTMP) to be reviewed and approved by DPD in consultation with Seattle Department of Transportation (SDOT). A construction transportation plan for workers and truck deliveries/routes shall be prepared to minimize disruption to traffic flow on adjacent streets and roadways. This plan shall include a requirement that truck trips be scheduled to avoid peak periods of 7:00-9:00 a.m. and 4:00-6:00 pm, Monday through Friday. The plan shall consider the need for special signage, flaggers, haul route definitions, street cleaning; identification of construction-worker parking; identification of potential street and/or sidewalk closures; coordination with Metro Transit relative to construction activity that could affect transit service proximate to the project site; vehicle, bicycle and pedestrian circulation and safety.

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 waterproofing material and shall remain posted on-site for the duration of the construction.

4. The construction activities (including but not limited to demolition, grading, deliveries, framing, roofing, and painting) shall be limited to non-holiday weekdays from 7:00 a.m. to 6:00 p.m. Interior work that involves mechanical equipment, including compressors and generators, may be allowed on Saturdays between 9:00 a.m. and 6:00 p.m. once the shell of the structure is completely enclosed, provided windows and doors remain closed. Non-noisy activities, such as site security, monitoring, weather protection shall not be limited by this condition. Construction activities outside the above-stated restrictions may be authorized by the Land Use Planner (Tamara Garrett 684-0976) when necessitated by unforeseen construction, safety, or street-use related situations. Requests for extended construction hours or weekend days must be submitted to the Land Use Planner at least three (3) days in advance of the requested dates in order to allow DPD to evaluate the request.

5. Comply with the provisions set forth by the approved Construction Transportation Management Plan.

Prior to issuance of Certificate of Occupancy

6. All temporary portables and associated structures located within the riparian management area and throughout the campus must be removed by the Seattle School District. The riparian management area must be restored back to its original state and/or restored as pervious surface with native plantings as identified by plan. All existing parking lots on the Nathan Hale campus must be re-stripped back to its original parking stall count prior to construction.

CONDITIONS-DEVELOPMENT STANDARD DEPARTURE

Prior to Issuance of the Building Permit

7. The following items must be identified on the building plans:
 - Low speed bumps in the parking areas.
 - Pattern pavers at athletic field parking lot pedestrian crossings.
 - Location of proposed signage.

During Construction

8. The Seattle School District will educate staff, teachers, parents and students about existing onsite parking lots and access to underutilized lots.
9. Whenever possible when removing asphalt, the Seattle School District will replace with appropriate pervious paving.
10. Seattle Public Schools and the construction company will install signage before/during the phased construction directing staff, teachers, parents and students to additional parking at Summit School (Jane Adams).

Prior to Certificate of Occupancy

11. The Seattle School District will install low speed bumps in all parking areas.
12. The Seattle School District will install pattern pavers that are pervious at athletic field parking lot pedestrian crossing as safety measures.
13. The Seattle Public Schools will work with Seattle Department of Transportation to discuss the implementation of pedestrian crossing safety features along Northeast 110th Street.

Signature: _____ (signature on file) Date: July 31, 2008
Tamara Garrett, Land Use Planner
Department of Planning and Development