



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:** 3009106  
**Council File Number:** CF #309641  
**Applicant Name:** Ted Holden for Seattle Department of Parks and Recreation  
**Address of Proposal:** 2700 California Avenue Southwest

**SUMMARY OF PROPOSED ACTION**

Council Land Use Action to remove ten existing athletic field light poles and install nine new light poles up to 90 ft. in height. Review includes improvements to existing athletic field including 8,000 cu. yds. of grading (Hiawatha Playfield). A Determination of Non-Significance was previously prepared and issued by the Seattle Parks and Recreation Department.\*

\*Note: The project description has been revised from the original notice of application.

The following approval is required:

**Council Land Use Action** – Council Concept Approval to waive or modify development standards for a City facility (installation of light poles and fixtures) SMC 23.44.036A; specifically to allow additional height for structures in a single-family zone (maximum allowed, 30 feet; proposed, 90 feet, SMC 23.44.012A).

**SEPA – Conditions to mitigate environmental impacts** – (Chapter 25.05, Seattle Municipal Code.)

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

\*Determination of Non-Significance issued by the Seattle Department of Parks and Recreation on May 6, 2008.

## **BACKGROUND INFORMATION**

### **Site and Vicinity Description**

The project site is the Hiawatha Playfield located in the Admiral neighborhood of West Seattle. This rectangular-shaped site is approximately 10.3 acres situated in a Single Family 5000 (SF 5000) zone. This property is bounded by California Avenue Southwest on the west, Walnut Avenue Southwest on the east, Southwest Lander Street to the north, and a portion of vacated Southwest Stevens Street and West Seattle High School to south. Development on the entire subject site consists of a community center (Hiawatha Community Center) situated near the center of the site between existing playfields; a children's play area and wading pool at the northeast corner; tennis courts at the northwest corner; and two (2) athletic playfields situated at the southeast and southwest areas of the site. The smaller athletic field ("Field Events") has a natural grass surface mainly utilized for tee ball and track field activities (shot put, long jump). The main athletic field ("Track Athletic Field") has an all-weather sand silt surface with a baseball infield and backstop located at the southwest corner, a softball infield and backstop located at the northeast corner, a football/soccer field overlay oriented northwest to southeast and a 400 meter red cinder surfaced running track surrounding the entire athletic field. The track athletic field is currently illuminated by ten (10) light poles ranging in heights from 55' to 84' tall.

Seventeen (17) existing surface parking spaces are situated along the site's southerly boundary line. Vehicular access to this parking area is via curb cuts along both Walnut Avenue Southwest and California Avenue Southwest. Both Walnut Avenue Southwest and Southwest Lander Street are considered as non-arterial streets and California Avenue Southwest is classified as 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 Hiawatha Park property.

The topography on this site is relatively flat and generally slopes in a westerly/southwesterly direction towards a sloped grass area above a retaining wall along the east side of California Avenue Southwest. Many mature trees, including a Heritage tree (Oak) and a tree (48" Elm-*Ulmus minor*) meeting the criteria to be classified as exceptional tree status (Director's Rule (DR) 6-2001), exists in the Park. This property is not located within any identified or designated Environmentally Critical Areas.

Surrounding properties east and south of the subject property are also zoned SF 5000. SF 5000, Lowrise 3 (L-3) and Neighborhood Commercial 2 (NC2-40) zones are north of the subject site. NC2-40 zoned properties are west of the proposal. Existing developments in vicinity of the subject site are as follows: West Seattle High School to the south; single family residences to the east and north; church and grocery store (Safeway) to the north; and a grocery store (PCC) and residential/commercial buildings to the west.

### **Proposal**

The Seattle Department of Parks and Recreation (DOPAR) proposes to convert the existing all-weather sand silt surfaced main track athletic field to a synthetic turf multi-use playfield with a perimeter rubberized running track at Hiawatha Playfield. The northerly softball field is proposed to be removed. Minor alterations to the field events area consisting of improvements to the shot put and long jump stations are proposed. Excavation of approximately 3,200 cubic yards (cu. yds.) of material and infill of approximately 4,600 cu. yds. of new material is anticipated to occur to reduce surface slope.

New landscaping consisting of eighteen (18) trees are proposed to be planted throughout the park property. Four (4) trees including a 48" Elm (*Ulmus minor*) are planned to be removed. Per the applicant, seven (7) trees are proposed to be salvaged and either transplanted onsite or relocated to other park sites in West Seattle. Tree protection measures are planned for the existing Heritage tree and the remaining trees within close proximity to the construction areas.

This proposal also includes the removal of ten (10) existing athletic light poles and installation of a new lighting system consisting of nine (9) new galvanized steel light poles measured 70' to 90' in height, supporting adjustable 1,500 watt (W) shielded luminaires (light fixtures) surrounding the track athletic field. Underground wiring surrounding the entire track athletic field will be routed to a new lighting control cabinet installed near the existing tennis courts. This lighting system would be connected to the existing DOPAR automatic programmable lighting control system (Skylogix): thus allowing the capability of being operated from a remote location and onsite with a secured manual override capability. The lights for each field would be operated separately so that lights could be turned off when a particular athletic field was not in use.

The lighting system is designed to limit spill light and glare by raising the floodlight mounting heights from the code maximum 30' to a height of 70'-90'. This would allow a more direct downward lighting of the play surface with steeper floodlight aiming angles. The lamps themselves are proposed to be shielded luminaires, including visors that will provide necessary on-field lighting levels and will comply with Illumination Engineering Society of North America (IENSA) recommended specifications for a Class IV or "recreational" facility. Class IV is the lowest of the four (4) light levels. This design level would provide an average light level at the playing field surface of 20 to 30 foot-candles (a foot-candle, or fc, being defined as a lighting level of one (1) lumen distributed uniformly over an area of one (1) square foot), depending on the specific requirements for each field. The soccer and football fields would require 27 fcs average maintained; whereas the baseball field would require 30 fcs average maintained for the infield areas and 27 fcs average maintained for outfield area.

#### Public Comments

The required public comment period ended on June 11, 2008 but was extended by public request to end on June 25, 2008. DPD received one (1) written comment regarding this proposal. The constituent cited concerns about construction impacts to the existing native trees and a request for special consideration to protect the Heritage tree.

Additionally, prior to application with DPD, DOPAR undertook substantial public outreach-some of which included the following actions:

- Project information posted on the DOPAR website, given to local media outlets, neighborhood planning groups, Seattle School District, City departments, Friends of Seattle's Olmstead Parks, posted at the site and mailed to neighbors and interested parties.
- One (1) public meeting was held in the month of December 2007 facilitated by DOPAR Staff.

#### Additional Background Information

Athletic fields have always been an important part of the City of Seattle's Parks system. Beginning in the late 1970s, however, DOPAR found that demand had grown due to increases in adult sports leagues and especially by the participation by women and girls in a variety of sports, a trend which appears to have continued. In addition, demand for sports facilities to serve soccer, ultimate frisbee, rugby, and lacrosse has driven the need for additional field capacity. This expansion in participants has been accompanied by a demand for increased year-round rather than single-season participation in most of the sports activities.

Because of the limited availability of new open spaces for active recreation within the City and the need to increase scheduling capacity, DOPAR commissioned a lighting study to develop a predictable method for the planning, design, and development of athletic field lighting systems within the City of Seattle. A portion of the study (McGowan Broz Engineers/DMD, 2001) analyzed the impacts of extending sports play into the evening at City-owned facilities and included a section on Recommended Sportsfield

Lighting Performance Standards. These standards focus specifically on a portion of the study titled *Light Trespass – Spill Light*. The standards are described as follows:

*“The maximum maintained vertical illuminance level for spill light must not exceed 0.8fc (initial 1.1fc) at the residential property line.*

*“The designer shall undertake initial vertical illuminance calculations on a line along the edge of the properties and roadways as defined by the City to establish compliance with the 0.8fc level. The levels shall be calculated at five feet above grade.”*

In 2003, DOPAR authored a document titled *Design Standards for Athletic Field Lighting* (<http://www.seattle.gov/parks/projects/standards/design.asp>). This document outlines issues that should be considered during the design phase of an athletic field lighting project and design standards on technical issues such as field lighting levels and obtrusive light.

For this project, DOPAR considers these recommendations/standards for the primary design and performance parameters. DOPAR has incorporated equipment specifications and calculations of the predicted levels of illuminance at the residential property lines surrounding the project site to fall within those recommended in the study.

### **ANALYSIS—COUNCIL HEIGHT WAIVER**

Public parks are City facilities permitted outright in SF 5000 zones. As is the case with many public facilities, the development standards of this zone constrain the facility in ways that hamper their fundamental purpose; to provide recreational opportunities. The Seattle Land Use Code sets a base height limit for structures in Single Family Zones at 30’ (SMC 23.44.012). The DOPAR seeks a Council modification of the height development standards of the Single Family Zone as they relate to the proposed light poles. The proposed luminaires are designed to function properly at a mounting height of 70’ to 90’ in order to reduce the impacts of spill light and to provide adequate illumination for sports play at this location. If the proposed lighting system pole height was limited to 30’ it would not function properly. 30’ tall poles would not provide enough height allowance in order to aim fixtures more accurately downward onto the athletic field; thus, spill light and glare lighting onto surrounding residential properties would not be improved. It is for situations like this that section 23.76.064 of the Seattle Municipal Code includes provisions for the City Council to waive or modify applicable development standards, accessory use requirements, special use requirements or conditional use criteria for City facilities.

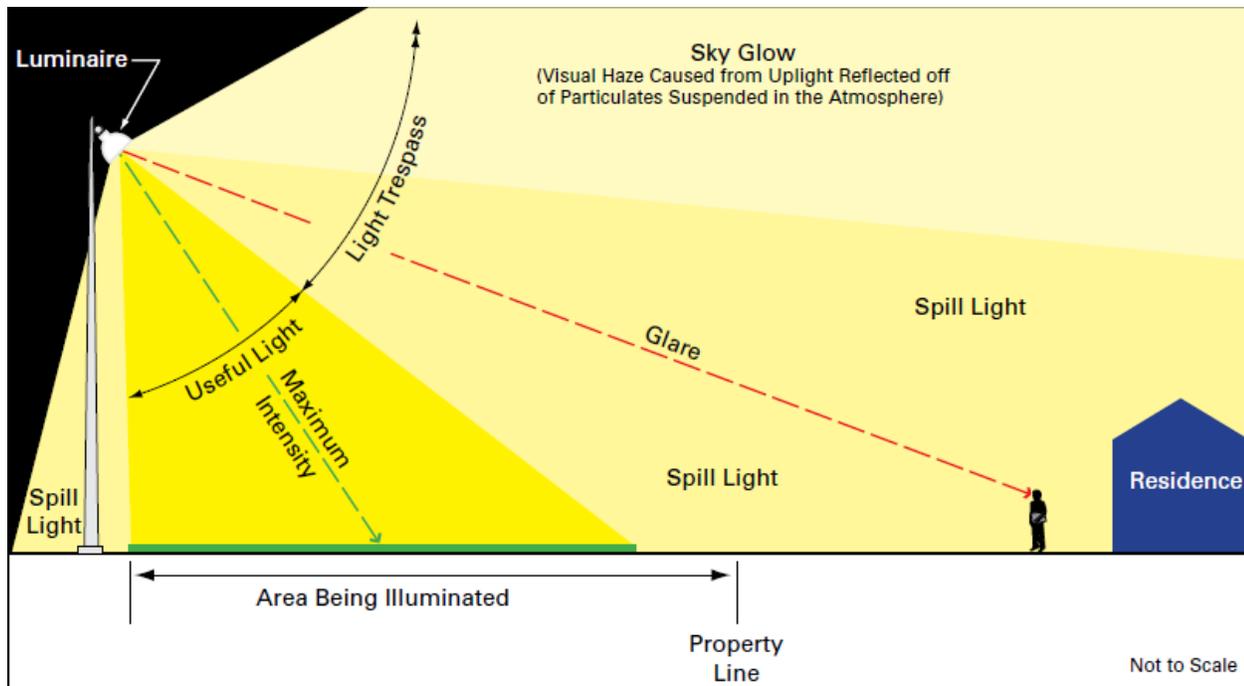
In making a recommendation to Council, SMC 23.76.050 charges the Director to draft an evaluation of the proposal based on the standards and criteria for the approval sought and consistency with the applicable goals and objectives of official City policies and the City's SEPA policies.

Outside of consistency with the SEPA policies, which are adequately described in DOPAR’s Determination of Non-Significance, the Land Use Code and Comprehensive Plan policies do not speak directly to issues of exterior lighting as described in SMC 23.44.008.H except to reduce the adverse impacts from incompatible land uses. In this case, the park use is both permitted and compatible with surrounding residential uses. The general development standards for uses permitted outright simply state that “Exterior lighting shall be shielded and directed away from residentially zoned lots”. However, the following applicable code and policy language does exist within SMC 23.44 to inform the Director’s evaluation of this project.

On Feb 20, 2001 Ordinance 120266 was adopted by Council to allow taller lighting standards for public school playfield lighting where necessary to improve safety for athletic participants and minimize impacts of light trespass and glare. Set forth in this Ordinance and the amended Land Use Code sections are criteria that represent direction with regard to this issue. Section 23.44.017.B.6 of the Code reads:

*Light standards for illumination of athletic fields on new and existing public school sites will be allowed to exceed the maximum permitted height, up to a maximum height of one hundred (100) feet, where determined by the Director to be necessary to ensure adequate illumination and where the Director determines that impacts from light and glare are minimized to the greatest extent practicable. The applicant must submit an engineer's report demonstrating that impacts from light and glare are minimized to the greatest extent practicable. When proposed light standards are reviewed as part of a project being reviewed pursuant to Chapter 25.05, Environmental Policies and Procedures, and requiring a SEPA determination, the applicant must demonstrate that the additional height contributes to a reduction in impacts from light and glare.*

This application is not a Public School site and therefore, is not eligible for the special exception process. However, with regards to the project's anticipated impacts, this code section is informative as it describes a situation under which additional pole height should be granted. The following is a brief response to those impact areas that should be considered as described by the Single Family section of the code. Additionally, the illustration below (provided by the lighting consultant) is provided to assist in illustrating technical terms that will be discussed throughout this report.



### Spill Light

The term “spill light” is defined as illuminance (light) falling beyond the area being illuminated. Spill light is expressed in foot-candles (fc) and is normally measured in the vertical plane. It is DOPAR’s goal to reduce the opportunity of spill light onto the surrounding residential properties. Diagrams and plans submitted by DOPAR’s lighting consultant, (D. A. Hogan & Associates, Inc.) demonstrate when additional mounting height for field lighting is permitted, the light is allowed to focus in a more vertical direction; thus, containing more light on the athletic field. DOPAR predicts that the majority of the spill light coming directly from the sports field luminaires would land on areas immediately adjacent to the fields, inside the park boundaries, onto the adjacent paved roadways and a minor portion of the abutting School District property. No spill light is predicted to extend onto the surrounding residential properties due to the proposed pole heights, existing onsite structures and vegetative screening. Additional mitigating measures to reduce potential spill light such as the installation of adjustable luminaires are also proposed.

As noted above, under “Additional Background Information,” DOPAR has adopted a sports field lighting standard with a guideline that the maximum light level at the nearest residential property line should not exceed 0.8 vertical fcs maximum maintained (1.1 fcs initial). All the sports fields included in this application as proposed to be developed with new light standards and luminaires would appear to meet this standard. Consequently, the proposed action would not result in adverse spill light impacts for residential properties adjacent to the park and project site.

### Glare

Glare is light that hinders or bothers the human eye due to the eye’s difficulty in adjusting to different levels of light. Direct glare from a light source is typically an important issue in the design and operation of athletic field lighting installations, both in terms of players and nearby populations. Topography and vegetation can change the impacts of glare. There is no industry standard for measuring glare once a project is completed. However, there may be design steps that may mitigate the effects of glare such as increased pole height and minimizing direct view of the lamps.

DOPAR’s goal is for the new lighting system to “reduce the level of objectionable neighborhood glare”. Per the document “*Design Standards for Athletic Field Lighting*”, a glare analysis should occur during the design phase. This analysis should include the lighting designer reviewing candlepower curves and determining the appropriate luminaire mounting height and optical system so that no greater than 12,000 candlepower from any given luminaire is visible from the residential property line. This document also specifies the engineer shall measure and record all illumination levels in accordance with IESNA LM-5 guidelines. Per DOPAR, if the lighting performance does not equal this guidelines or the performance expected by the citizens, the Design Engineer and Contractor must respond with adjustments or modifications that within reason both meet objective criteria and any unresolved community needs regarding control or elimination of objectionable light.

The proposed lamps would be visible from the surrounding residential properties. However, certain mitigation measures have been built into the design of the lighting systems in order to minimize glare impacts in the surrounding neighborhood. These include:

- the use of adjustable shielded aimable lighting fixtures with the largest external visors currently available on the market;
- installing taller poles and increasing luminaire mounting heights to permit more downward aiming angles and greater control of the light;

- a performance verification of the lighting system that allows for final adjustments of the luminaires after installation to address possible issues of glare.

### Sky Glow

Sky glow is defined as “the haze or glow of light emitted above the lighting installation and reduces the ability to view the darkened nighttime sky. This is a combination of light emitted directly from the light source and reflected light that casts upward from the surface being illuminated. The level of sky glow is also impacted by atmospheric conditions; clouds and moisture increase the effects of sky glow”. DOPAR’s design standards require a sky glow assessment during the design stage. However, DOPAR recognizes that this method does not account for the reflected light from the field surface or the atmospheric conditions. Therefore, reflected light off of the lighted surface remains a concern.

It has been the experience of DPD in the evaluation of other sports field lighting proposals and DOPAR that it is possible to reduce additional sport field lighting impacts through operational mitigation measures-specifically, restricting the hours and days of sports field operation.

Per the applicant, no specific change in scheduling or operation parameters (except during the construction period when no athletic activities will be scheduled) are associated with this proposal. Games and practices at the existing lighted Hiawatha Playfield are currently scheduled throughout the entire year to begin at 8:00 a.m. and end no later than 11:00 p.m., seven (7) days a week. DOPAR predicts that no additional sport field lighting impacts will occur because the hours and days of the Hiawatha sport field operation will not increase; therefore, additional impacts associated with sky glow aren’t expected to occur. DPD concurs with DOPAR’s assessment.

### Noise, Traffic and Parking

This application is to remove ten (10) athletic light poles ranging in heights from 55’ to 84’ tall and install a new lighting system consisting of nine (9) new light poles measured 70’ to 90’ in height above the finished grade at the perimeter of the track athletic playfield. While clearly this request for concept approval of the proposed lighting standards is more directly related to environmental issues such as glare, spill light and sky glow; elements of traffic, noise and parking may be indirectly impacted by allowing additional play time enabled by enhanced artificial illumination.

The applicant provided the following key findings regarding scheduling at Hiawatha:

- Per the Joint Use Facilities Agreement between The Seattle School District (“District”) and DOPAR, the District has first priority for scheduling usage of DOPAR’s athletic fields during regular school hours until 5:30 p.m. This Agreement stipulates joint use program scheduling on an annual basis.
- Per a Memorandum of Agreement between DOPAR and the District, District athletic programs are allowed to utilize Hiawatha Playfield during the normal school operation months, throughout the school day until 5:30 p.m. and on Saturdays between 8:00 a.m. to 10:00 a.m.
- The majority of the scheduled activity at Hiawatha is associated with District programs. The Hiawatha Playfield Scheduling Abstract identified approximately 2,286 hours of scheduled activities during one year (from July 1, 2007 to June 30, 2008). The amount of hours per activities are as follows: 1,202 hours for the West Seattle High School Physical Education Classes (daytime hours, 53%); 779 hours for recreation use (evenings and weekends, 34%); and 305 hours for the West Seattle High School Extracurricular Athletics (evenings and weekends, 13%).

Per DOPAR, this lighting system proposal will not facilitate more field availability than what currently exists. DOPAR states the athletic field will continue in use at the same level of play and during the same playfield schedule timeframes. Current playfield scheduling at the Hiawatha property allows games and practices to be scheduled throughout the entire year beginning at 8:00 a.m. and ending no later than 11:00 p.m., seven (7) days a week. Also, due to athletic field layouts and space overlap, only one (1) sport's activity can take place at a time. If any increase in future recreational demands for this facility occurs, DOPAR predicts it would happen during the summer (non-school) months when field light usage is not essential. Additionally, it is expected that noise associated with sports play at this field and vehicular noise would not increase due in part to possible extended play time allowed in the evenings.

In summary, DOPAR states the playfield lighting improvement project is not expected to exacerbate the existing traffic, parking or noise conditions. DPD concurs with DOPAR's assessment.

### Conclusion

In making a recommendation to Council, SMC 23.76.050 charges the Director to draft an evaluation of the proposal based on the standards and criteria for the approval sought and consistency with the applicable goals and objectives of Seattle's land use policies, the City's SEPA policies and any other applicable official City policies.

Outside of consistency with the SEPA policies, which are discussed at length in the environmental documents prepared by DOPAR, the Land Use Code and Comprehensive Plan policies do not speak directly to issues of the height of lighting standards in City parks. SMC 23.44.017.B.6 allows light standards for illumination of athletic fields on public school sites in single family zones to exceed the maximum permitted height (30') of the single family zone up to a maximum of 100', when it is demonstrated that the additional height would contribute to a reduction in impacts from light and glare.

Public or private parks and public playfields are principal uses permitted outright in single family zones. In this case, the playfield use is both permitted and compatible with surrounding residential uses with impacts of height, bulk and scale adequately mitigated through siting and design considerations.

The proponent has considered the relationship of the project to the surrounding area in siting, design of the proposed light poles. The proponent's design constraints limit both spill light and glare and the effects of sky glow. As proposed, the use will be compatible with current and future uses in the vicinity and is consistent with the SEPA and Land Use Policies of the Seattle Municipal Code. The Director recommends that the modification for additional height for poles and luminaires along the margins of the track athletic field be granted, as proposed.

### ANALYSIS – SEPA

The Hiawatha Playfield Improvements and Lighting Replacement Project have undergone an environmental review in accordance with Washington State SEPA requirements. Project specific environmental impacts of the Hiawatha Playfield Improvements and Lighting Replacement proposal have been disclosed and analyzed in the environmental checklist prepared by DOPAR dated April 14, 2008, acting as Lead Agency. On May 6, 2008, DOPAR issued a Determination of Non-significance (DNS) for the athletic playfield improvements.

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, construction renderings and green house gas emission calculation), public comment 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 and Long-term adverse impacts are anticipated from the proposal.

### 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; conflict with normal pedestrian movement adjacent to and at 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 construction traffic and parking impacts, they will be sufficient without conditioning pursuant to SEPA policies. Further discussion of short term noise, air quality, grading and construction traffic and parking related impacts follows.

### Noise

The Hiawatha Playfield site abuts one (1) arterial and two (2) non-arterial streets; California Avenue Southwest, Walnut Avenue Southwest and Southwest Lander Street. Residential properties are situated across the abovementioned streets; west, east and north of the project site. Recreational uses and activity on the West Seattle High School campus are cited as existing noise sources on and near the property.

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 accessory playfield structures, lighting and fencing; construction of the proposed lighting poles, accessory playfield structures 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 playfield fencing/structures and site work, the SEPA checklist notes the following mitigating elements of the proposal:

- All construction activity would be restricted to hours and decibel levels designated by the Seattle Noise Control Ordinance.
- DOPAR will coordinate with the contractor to modify construction activity or timing if complaints are voiced by neighboring properties.

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 and deliveries) shall be limited to non-holiday weekdays from 7:00 a.m. to 6:00 p.m. 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. Additionally, the indirect impact of construction activities including construction worker commutes, truck trips, the operation of construction equipment and machinery, and the manufacture of the construction materials themselves result in increases in carbon dioxide and other greenhouse gas (GHG) emissions that adversely impact air quality and contribute to climate change and global warming. 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 during construction, dust and commercial construction vehicle exhaust are the most likely types of emissions. The following measures are cited in the SEPA checklist to reduce or control emissions during construction:

- Site-specific development would comply with Best Management Practices to minimize dust pollution.
- Vehicle operators will be instructed to shut equipment or vehicles off when not in active use.

Existing regulations are sufficient to control short-term air quality impacts. No potential short term significant adverse impacts to air are anticipated and therefore conditioning air quality mitigation is not necessary.

### Grading

Excavation to construct the track athletic field and the import of fill to achieve the proposed grade will be necessary. The maximum amount of grading proposed will consist of 7,800 cubic yards of material. Some of the soil removed will not be reused on the site and will need to be disposed off-site by trucks.

To mitigate erosion resulting from grading activities associated with the removal of the existing playfields/accessory equipment and construction of the new playfield improvements, the SEPA checklists notes the following mitigating element of the proposal:

- The contractor will be required to prepare and follow a temporary erosion and sedimentation control (TESC) plan in accordance to SMC 22.800. The TESC plan will need to be approved by the City prior to the beginning of any grading or excavation work.

City code (SMC 11.74) provides that material hauled in trucks not be spilled during transport. The City requires that a minimum of one foot of "freeboard" (area from level of material to the top of the truck container) be provided in loaded uncovered trucks which minimize the amount of spilled material and dust from the truck bed en-route to or from a site. No further conditioning of the grading/excavation element of the project is warranted pursuant to SEPA policies.

### Construction-Related Streets, Parking and Pedestrian Circulation

This proposal includes minor 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).

DOPAR indicates the project would primarily generate traffic during the construction period, which may last for up to five (5) 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. It is anticipated that future contractors will use the gated entrance along California Avenue Southwest. If primary construction access entering and exiting the site is via California Avenue Southwest, street parking may be disrupted during construction. Additionally, if the entrance abutting Walnut Avenue Southwest is used, existing surface parking utilized by Hiawatha Community Center and West Seattle High School students/staff may be disrupted.

The checklist notes the following mitigating elements of the proposal:

- During construction, a specific point-of-access will be assigned and notices/signage will be posted.
- DOPAR and School District will coordinate schedules; and notify the contractor if special events or activities may conflict with construction traffic.

Construction activities may result in obstacles to pedestrians, park goers and students. 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 DOPAR specifically identified the City agency responsible for receiving and enforcing a future 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 bulk and scale from the additional lighting standards; possible increased traffic demand; increased ambient noise due to human activity; possible increase in light and glare; and increased energy consumption.

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 City park. Therefore additional discussion regarding light and glare, historic preservation, air quality, parking is warranted.

### Light and Glare

SEPA policies state with regard to Light and Glare that:

*It is the City's policy to minimize or prevent hazards and other adverse impacts created by light and glare. If a proposed project may create adverse impacts due to light and glare, the decisionmaker shall assess the impacts and the need for mitigation.*

Mitigation of these impacts is subject to the Overview policy. If mitigation is warranted, SEPA provides that mitigation measures can be imposed that limit the area and intensity of illumination, limiting the location or angle of illumination, limiting the hours of illumination and requiring additional landscaping. DOPAR has imposed several of these measures as design parameters for the project as described in the foregoing analysis, chief among them the height of the light standards themselves. Furthermore, as a recommended condition of the Council Approval of the waiver of development standards, DOPAR would be required to provide an Illumination Management Plan to be instituted as part of any eventual construction approval. This Plan would describe technological and program controls to do the following: limit the lighting of each field to evenings when play is scheduled; limit play up to the hour of 11:00 p.m.; limit illumination of any of the playfields to 15 minutes after the 11:00 PM limit of play. With the recommended Illumination Management Plan in place, no further mitigation 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, Hiawatha Playfield is designated as a City historical landmark. As such, this proposal is subject to review and approval by the City's Landmarks Preservation Board. At the June 6, 2008 meeting of the City's Landmarks Preservation Board, the Board voted to approve a Certificate of Approval for proposed site alterations including the installation of synthetic turf, fencing, lighting; tree removal and tree planting.

### Air Quality

The number of vehicular trips associated with playfield improvements are expected to decrease from the amount currently generated by the site because of the removal of the softball field and installation of the athletic turf. Together these changes may result in decreases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming. No potential long term significant adverse impact to air quality is anticipated and therefore mitigation is not necessary.

### Parking

Seventeen (17) surface parking spaces exists onsite at the Hiawatha Playfield property. 188 surface parking spaces exist at the neighboring West Seattle School property. DOPAR explains, as authorized by the Citywide Joint Use Facilities Agreement, parking at the high school site is utilized by field users during non-school hours. Also, the current on-street parking supply along the three (3) streets that abut the subject site can accommodate approximately sixty-six (66) spaces.

No parking analysis report was submitted with this proposal. However, as described in a memorandum to DPD and based on DOPAR's staff experience, peak parking conditions at Hiawatha occasionally occurs during an important late season (spring) game against an opponent outside of the immediate area. DOPAR estimates in this scenario, a total of 200 parking spaces would be required to meet the peak parking demand.

The SEPA checklist doesn't identify any proposed long-term measures to reduce or control transportation impacts. Per DOPAR's SEPA report, *"Parks is not aware of any parking issues associated with field users and few or no complaints have been received. No significant adverse parking impacts are anticipated and thus no mitigation is warranted or necessary."*

SEPA provides authority to mitigate adverse parking impacts associated with development projects (SMC 25.05.675.M). DOPAR does anticipate that recreational demand for the facility may increase due to the enhancement of the playing surface and surrounding amenities. However, DOPAR doesn't anticipate any long-term parking impacts associated with this proposal because no changes in the field

operation or increases in the field count are proposed. DPD agrees with DOPAR's assessment concerning parking and concludes that there is adequate parking at the neighboring West Seattle High School site and in the immediate area to accommodate possible spillover parking associated with future seasonal activity and/or high-attendance events. Therefore, no further conditioning of the parking element of the project is warranted pursuant to SEPA policies.

**RECOMMENDED DECISION - COUNCIL CONCEPT APPROVAL**

It is recommended that the proposed waiver to allow poles up to 90 feet in height at this City Facility be **GRANTED.**

**RECOMMENDED CONDITION(S) – COUNCIL CONCEPT APPROVAL**

It is recommended that DOPAR provide a detailed Illumination Management Plan to include detailed technological and programmatic controls on any lighting system that will be installed at Hiawatha Playfield. This Plan should describe technological and program controls to limit the lighting of each field to evenings when play is scheduled, limit play to the hour of 11:00 p.m. It is further recommended that this Illumination Management Plan shall be appended to any building permit applications submitted to DPD for field lighting installation at Hiawatha Playfield.

**DECISION - SEPA**

The environmental checklist, Master Use Permit plans submitted on the project; and responses to requests for information all comprise DPD's record. Pursuant to SMC 25.05.600.D.1, DPD relies on the environmental documents and technical reports prepared by DOPAR. DPD has determined that the DNS issued and utilized for the environmental analysis of *The Hiawatha Playfield Improvements and Lighting Replacement Project* 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.

**RECOMMENDED CONDITION(S) – SEPA**

**Prior to the Issuance of a Grading or Building Permit**

1. 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 am 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 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.

2. Comply with the provisions set forth by the approved Construction Transportation Management Plan.
3. 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. 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.

Signature: (signature on file)  
Tamara Garrett, Land Use Planner  
Department of Planning and Development

Date: November 27, 2008