



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:** 3009174  
**Applicant Name:** Martha Rogers for Seattle University  
**Address of Proposal:** 1313 East Columbia Street

**SUMMARY OF PROPOSED ACTION**

Land Use Application to change the use of an existing 49,586 sq. ft. warehouse building to Major Institution (Seattle University).

The following approvals are required:

**SEPA - Environmental Determination** - Chapter 25.05, Seattle Municipal Code.

**Certificate of Approval** – Landmarks Preservation Board (SMC 23.66)

**SEPA DETERMINATION:**  Exempt  DNS  MDNS  EIS

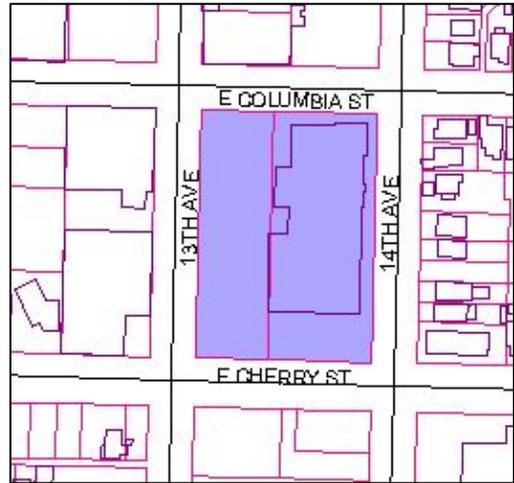
DNS with conditions\*

DNS involving non-exempt grading, or demolition, or another agency with jurisdiction.

\* The Determination of Non-Significance was published on July 3, 2008.

## **BACKGROUND DATA**

The Seattle University campus is located in Seattle's south Capitol Hill neighborhood, east of I-5 and south of Madison Street. Specifically, the campus site extends from East Cherry Street to the north, East Jefferson Street to the south, 15<sup>th</sup> Avenue to the west and mid-block between 18<sup>th</sup> and 19<sup>th</sup> Avenues to the east. The subject site was recently acquired by the Seattle University, which is considered a Major Institution subject to the Major Institution Master Plan (MIMP). The proposal is located on a 54,360 square foot block bounded by East Columbia Street to the north, 14<sup>th</sup> Avenue to the east, East Cherry Street to the south and 13<sup>th</sup> Avenue to the west. The proposal is located in an underlying Lowrise 3 (L-3) zone and the Major Institution Overlay with a 37-foot height limit (MIO-37). No changes to the existing structure height are proposed.



The immediate area is marked by a variety of uses, which are primarily residential to the east, north and south, institutional to the west. The existing 49,589 sq. ft. building located on this site, referred to as the Coca Cola Building, is proposed to undergo interior renovations with very few minor exterior changes as a result of the proposed change of use. Under previous ownership, the existing building has functioned as a bottling plant, and most recently as a warehouse use and under the ownership of Seattle University will be converted to a Major Institution use. In the near term, the existing building will be used to house the temporary library functions, while the Lemieux Library, located elsewhere on campus, is being renovated and expanded (under MUP 3009154).

The site contains surface parking for approximately 59 stalls. A Minor Amendment under Project #3009273 was granted to modify the parking requirements outlined in the current MIMP. Specifically, the amendment allowed the parking located at 1313 East Columbia Street to be used by the entire campus, and not just the immediate site. This minor amendment was granted on a temporary basis through the construction of the campus library addition (December 31<sup>st</sup>, 2010.).

This site is included in the new Major Institution Master Plan (MIMP), therefore, any future uses on this site will be considered under the new MIMP and its environmental documentation.

The applicant submitted a historic nomination application to the Department of Neighborhoods and the Landmarks Preservation Board unanimously designated the exterior of the structure as a landmark on August 6, 2008. The proposed exterior building alterations (new window, roofing, elevator, etc) are under review by the Landmarks Preservation Board.

### **Public Comments**

Notice of the project was published on July 3, 2008. The required public comment period ended on July 16, 2008. No comment letters were received.

Additional notice concerning the review of the project also occurred through the Landmarks Preservation Board for meetings held on June 18, 2008, June 27, 2008, August 6, 2008 and September 3, 2008.

### **ANALYSIS – SEPA**

The initial disclosure of the potential impacts from this project was made in the environmental checklist submitted by the applicant dated June 18, 2008 and annotated by the Department. The information in the checklist, supplemental information provided by the applicant, project plans, and the experience of the lead agency with review of similar projects form the basis for this analysis and decision.

The SEPA Overview Policy (SMC 25.05.665 D) clarifies the relationship between codes, policies, and environmental review. Specific policies for each element of the environment, certain neighborhood plans and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority. The Overview Policy states in part: "where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation" (subject to some limitations). Under 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 building activities and hydrocarbon emissions from construction vehicles and equipment; increased dust caused by construction activities; increased traffic and demand for parking from construction equipment and personnel; conflicts with normal pedestrian and vehicular movement adjacent to the site; increased noise; and consumption of renewable and non-renewable resources. No excavation or grading activity is anticipated. 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: 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); and the Noise Ordinance (construction noise). Compliance with these applicable codes and ordinances will reduce or eliminate most of the short-term impacts to the environment.

### **Environmental Health**

With respect to air quality and environmental health impacts, no demolition of the structure is proposed. However, the interior renovations have the potential for the presence of asbestos materials that could be released to the air/environment during renovation activities. The Puget Sound Clean Air Agency has jurisdiction over this impact, but there is no reliable means of triggering their involvement other than by requiring the proponent to notify the agency of the proposal. Hence, project approval has been made contingent upon such notification.

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 emissions which adversely impact air quality and contribute to climate change and global warming. While these impacts are adverse, they are not expected to be significant due to the relatively minor contribution of greenhouse gas emissions from this project. No potential short term adverse impact to air is anticipated and therefore air quality mitigation is not necessary.

### Noise

Noise impacts will result during the renovation activities associated with this project. As these interior renovations proceed, noise associated with construction could adversely affect the surrounding uses. In the immediate area are several commercial and residential uses. Due to the proximity of these uses, the limitations of the Noise Ordinance are found to be inadequate to mitigate the potential noise impacts. Pursuant to the SEPA Overview Policy (SMC.25.05.665) and the SEPA Construction Impacts Policy (SMC 25.05.675B), mitigation is warranted.

1. The hours of construction activity shall be limited. Limit the hours of any construction activity not conducted entirely within an enclosed structure to non-holiday weekdays between 7:00 a.m. and 6:00 p.m. Limited work on weekdays between 6:00 p.m. and 8:00 p.m. and on Saturdays between 9:00 a.m. and 6:00 p.m. may be allowed if prior approval is secured from the City. Such after-hours work is limited to emergency construction necessitated by safety or street use (traffic) concerns, work of low noise impact; landscaping activity which does not require use of heavy equipment (e.g. planting), or work which would substantially shorten the overall construction timeframe. Such limited after-hours work will be strictly conditioned upon the owner(s) and or responsible party(s) providing at least three working days' notice to allow DPD to evaluate the request.

### Transportation: Truck & Equipment

The SEPA Overview Policy (SMC 25.05.665) and the SEPA Construction Impacts Policy (SMC 25.05.675B) allow the reviewing agency to mitigate impacts associated with construction activities.

Construction activities are expected to affect the surrounding area. Impacts to traffic and roads are expected from truck trips during excavation and construction activities. The SEPA Overview Policy (SMC 25.05.665) and the SEPA Construction Impacts Policy (SMC 25.05.675B) allows the reviewing agency to mitigate impacts associated with transportation during construction. The construction activities will require the removal of material from site and can be expected to generate truck trips to and from the site. In addition, delivery of concrete and other materials to the site will generate truck trips. As a result of these truck trips, an adverse impact to existing traffic will be introduced to the surrounding street system, which is unmitigated by existing codes and regulations.

Existing City code (SMC 11.62) requires truck activities to use arterial streets to the greatest extent possible. This immediate area is subject to traffic congestion during the p.m. peak hour, and large construction trucks would further exacerbate the flow of traffic. Pursuant to SMC 25.05.675(B) (Construction Impacts Policy) and SMC 25.05.675(R) (Traffic and Transportation), additional mitigation is warranted.

2. For the duration of the construction activity, the applicant/responsible party shall cause construction truck trips to cease during the hours between 4:00 p.m. and 6:00 p.m. on weekdays.

This condition will assure that construction truck trips do not interfere with daily p.m. peak traffic in the vicinity. As conditioned, this impact is sufficiently mitigated in conjunction with enforcement of the provisions of existing City Code (SMC 11.62).

For the removal and disposal of the spoil materials, the 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.

The Street Use Ordinance requires sweeping or watering streets to suppress dust, on-site washing of truck tires, removal of debris, and regulates obstruction of the pedestrian right-of-way. This ordinance provides adequate mitigation for transportation impacts; therefore, no additional conditioning is warranted pursuant to SEPA policies.

### Construction Parking

Construction of the project is proposed to last for several months. On street parking in the vicinity is limited and the demand for parking by construction workers during construction could adversely impact the demand for on-street parking, traffic flow or other aspects of circulation. Therefore, the following condition is warranted:

3. The owner and/or responsible party shall assure that construction vehicles and equipment are parked on the subject site for the term of construction.

These conditions will be posted at the construction site for the duration of construction activity. The authority to impose this condition is found in Section 25.05.675.B of the Seattle SEPA ordinance.

### Historic and Cultural Preservation

The building at 13131 East Columbia, referred to as the “Coca Cola” Building, is a designated City of Seattle Landmark. The proposed exterior building alterations are under review by the Landmarks Preservation Board. Therefore, no further mitigation pursuant to SEPA authority at SMC Section 25.05.675.A is warranted.

### Long-term Impacts

Long-term or use-related impacts are also anticipated as a result of approval of this proposal including: increased traffic in the area and increased demand for parking; and increased demand for public services and utilities. The existing building is to remain; therefore the bulk and scale impacts will remain unchanged.

Several adopted City codes and/or ordinances provide mitigation for some of the identified impacts. Specifically these are: the Stormwater, Grading and Drainage Control, the City Energy Code will require insulation for outside walls and energy efficient windows. The Land Use Code controls site coverage, setbacks, building height and use and contains other development and use regulations to assure compatible development. A Certificate of Approval from the Landmarks Preservation Board is required, which includes code provisions to address changes to the exterior features of the building. Compliance with these applicable codes and ordinances is adequate to achieve sufficient mitigation of most long-term impacts that are not considered significant.

### Air Quality

Seattle's air quality is adversely affected primarily by vehicular emissions, and the proposed project is expected to have a minimal impact on air quality, relative to the existing and projected background traffic especially since the anticipated use of the building is intended for academic purposes specific to the student population. The University students overwhelmingly utilize campus functions on foot during the day; the integration of the subject building into campus functions is extremely unlikely to affect existing levels of vehicular activity around the campus. Current federal and state regulations are likely to provide adequate mitigation for impacts on air quality through restrictions on vehicular emissions. No further mitigation pursuant to SEPA authority at SMC Section 25.05.675.A is warranted.

The number of vehicular trips associated with the project construction is expected to increase from the amount currently generated by the various sites and the projects' overall electrical energy and natural gas consumption is expected to increase. Together these changes may result in increases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming. While these impacts are adverse, they are not expected to be significant due to the relatively minor contribution of greenhouse gas emissions from this project.

### Historic and Cultural Preservation

The subject building is a City of Seattle Landmark. As such, any changes to this structure are subject to review and approval by the Landmarks Preservation Board. An application for Certificate of Approval was submitted to the Department of Neighborhoods Historic Preservation Program and the nomination hearing was held on June 18, 2008. The building was designated as a landmark on August 6, 2008. The Board reviewed the proposed alterations on multiple occasions. For these review, plans, elevations, renderings, and information on materials were supplied. The Board will continue to review the proposed design, commenting on how the

proposed exterior alterations can best preserve the architectural style of the building. A Certificate of Approval must be obtained from the Landmarks Preservation Board/Department of Neighborhoods Director prior to any exterior alterations. Given the review by this designated body, no further conditions pursuant to SMC 25.05.675 are warranted.

### Transportation

The change of use from warehouse to Major Institution is unlikely to add additional trips because the proposed library function already existing elsewhere on campus and is being relocated to the subject site. The current and expected users of the library would be persons already on campus to study or work. It is anticipated that use pattern would continue with the temporarily relocated library use. It is assumed that the transportation impacts of all future Major Institution uses on the subject site will be addressed in the new MIMP, currently being developed. Therefore, no further mitigation pursuant to SEPA authority at SMC Section 25.05.675.R for long-term traffic impacts is warranted.

### Parking

The subject site currently contains parking for 71 vehicles (54 surface parking stalls and 17 exterior covered stalls). An additional 16 stalls were added, for a total of 87 stalls. The use of these parking stalls is not limited to the functions within the subject building, but may be used for campus wide purposes per the Minor Amendment (#3009273). The MIMP and associated EIS discussed parking requirements and impacts for the entire campus. The increase of 87 stalls to the overall campus parking quantity does not exceed the campus maximum parking requirements, yet remains above the minimum parking requirements. The Transportation Management Program includes strategies and actions intended to reduce parking and traffic demand associated with growth at the University (Pages 65-85 of the MIMP). Therefore, no mitigation pursuant to SEPA authority at SMC Sections 25.05.675.M for long-term parking impacts is warranted.

## **DECISION - SEPA**

The application is **CONDITIONALLY GRANTED.**

## **CONDITIONS – SEPA**

### Prior to the Issuance of a Construction Permit

1. A Certificate of Approval for any changes to the building exterior from the Landmarks Preservation Board/Department of Neighborhoods Director must be obtained.

