



City of Seattle

Gregory J. Nickels, Mayor

Department of Planning and Development

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**CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR OF
THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

Application Number: 3009549
Applicant Name: Seattle Public School District
Address of Proposal: 1819 North 135th Street

SUMMARY OF PROPOSED ACTION

Land Use Application to allow a 17,200 sq. ft. two-story classroom addition and exterior alterations (canopies and covered walkway) to an existing institution in an environmentally critical area (Ingraham High School). Project will include tree planting and removal, landscaping and re-striping and re-configuring existing parking lot to provide 160 surface parking spaces. Review includes demolition of seven portables, and one modular structure (totaling 12,134 sq. ft.). Revised Determination of Non-Significance dated May 7, 2008 was prepared by Seattle Public Schools.*

*Note: The project description has been revised from the following original notice of application: “Land Use Application to allow a 22,000 sq. ft. two-story classroom addition and exterior alterations (canopies) to an existing institution in an environmentally critical area (Ingraham High School). Project will include tree planting and removal, landscaping and re-striping and re-configuring existing parking lot to provide 160 surface parking spaces. Review includes demolition of seven portables, and one modular structure (totaling 12,600 sq. ft.). Revised Determination of Non-Significance dated May 7, 2008 was prepared by Seattle Public Schools.”

The following approval is required:

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

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 Revised SEPA Threshold Determination of Non-Significance issued by Seattle School District on May 7, 2008.

BACKGROUND INFORMATION

Site and Vicinity Description

The Ingraham High School Campus encompasses approximately 28.17 acres located in a Single Family 7200 (SF 7200) zone. This Campus is bounded on the west by Ashworth Avenue North, on the north by North 135th Street, on the south by North 130th Street and on the east by City owned property (Helene Madison Pool), North 133rd Street and residential properties. The school site consists of three (3) one-story buildings connected by covered walkways (totaling 187,136 square foot (sq. ft.)) comprising of a performing arts auditorium, library, commons areas, gymnasium, classrooms and offices; lighted surface athletic courts; lighted synthetic athletic fields with bleacher seating and several detached support structures containing concessions, restrooms, field offices, storage and ticket sales; seven (7) portable classrooms; and one (1) modular building.

In the 2007-2008 school year, approximately 1,200 students and 105 peak-hour workers (teachers, staff, etc.) attended Ingraham. The total capacity of the school is 1,400 students. Per the Seattle School District ("District"), student enrollment is slated to increase to 1,400 students in the next two (2) years with the staff count remaining the same.

The subject site also comprises three (3) onsite surface parking areas; auto shop parking lot (5 stalls), south parking lot (47 stalls) and the east parking lot (52 stalls). An additional thirteen (13) parking spaces are configured in an angular fashion, straddling the common boundary line between the Ingraham east parking area and the DOPAR north parking area. Vehicular access to these parking areas is via curb cuts along Ashworth Avenue North, North 135th Street and North 133rd Street. Additional service access to the campus occurs via North 130th Street which is classified as a Principal Arterial street, pursuant to SMC Chapter 23.53, with a total of four (4) lanes of traffic—two (2) lanes of traffic running west and two (2) lanes of traffic running east. Ashworth Avenue North, North 135th Street and North 133rd Street are classified as non-arterial streets. Sidewalks and curbs exist along that portion of the North 130th Street that abuts the school property. A school bus loading zone occurs on the south side of North 135th Street adjacent to the school property and the neighboring City owned property.

A mix of shrubs and trees are located throughout and along the perimeter of the school property, with a park-like stand of mature trees ("Northwest Tree Stand") situated at the site's northwest corner and a native tree forest community ("East Forest") on the east side of the site abutting the DOPAR boundary line. The topography on the majority of this site is relatively flat (gently sloping 5% or less) with a downward grade change occurring between the athletic fields and the main school buildings. Conversely, a steep downward sloping condition occurs at the southwestern corner and southern limit of the proposal site adjacent to Ashworth Avenue North and North 130th Street. This area has been identified as Environmentally Critical Area (ECA)-Steep Slope. The applicant has been granted a limited exemption (#6158432) from ECA steep slope development standards for all work associated project (sidewalk and tree removal) within this identified area but ECA review is still required for the building permit application(s).

Surrounding properties to the west, south and east of the subject property are also zoned SF 7200. Single Family 5000 (SF 5000) zoning is identified north of the school campus. Existing developments in vicinity of the subject site are as follows: single family residences to the north, south, east and west; and Helene Madison Pool to the east.

Helene Madison Pool is an indoor pool facility with two (2) onsite surface parking areas: north upper parking lot (165 stalls) and south parking lot (32 stalls). Historically, Ingraham students and staff have utilized the north upper parking area on a daily basis. Vehicular access to this parking area is via two entrances situated along the properties common boundary line and via a curb cut along Meridian Avenue North. This existing parking arrangement between the District and DOPAR is discussed further in this report.

Proposal

The District proposes renovation of Ingraham High School as part of the Building Excellence Phase III Capital Improvement Program. A total of 12,134 sq. ft. of structure is proposed to be removed. Demolition of one (1) existing modular building and removal of seven (7) portables is proposed.

A new two-story, 17,200 sq. ft. “C” shaped addition surrounding 5,417 sq. ft. of outdoor planted courtyard area is planned to be constructed against the west end of the main school building. The addition will house new classrooms and a south facing lobby area connecting the school building with a new pathway leading to Ashworth Avenue North. Exterior alterations consisting of canopies above the main school building’s north and east entrances (1,260 sq. ft. total) and reconfiguration of the covered walkway (1,638 sq. ft.) between the existing technology building and science-art building are also proposed.

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
Auto Shop	5	0	-5 ¹
South	47	138	91
East ²	65	35	-30
Total Parking²	117	173	56

1. In the future, the Auto Shop parking area will be gated and fenced and restricted from staff/student for daily parking use.

2. This parking count includes the existing parking (13 stalls) that straddles the common boundary line between the District and DOPAR properties.

Two (2) curb cuts along North 135th Street currently providing vehicular access to the East parking area are proposed to be reconfigured to create one (1) curb cut 24’ in width. No new vehicular entrances to onsite parking are proposed.

Excavation of approximately 3,600 cubic yards (cu. yds.) of material is anticipated to occur during the construction of the foundation for the new addition and installation of the proposed rockery wall (30’ maximum in height).

Construction of the addition and a poor health status determination necessitates the removal of seventy-two (72) mature trees. An additional nineteen (19) mature trees are proposed to be removed because of either the reconfiguration of the existing surface parking areas or hazard potential due to their proximity to power lines. Approximately 283 trees are planned to be planted throughout the school property. Landscaping enhancements inclusive of new native understory plantings, shrubs and groundcovers are also proposed. Site improvements including new pedestrian pathways and bike racks are included in the school proposal.

Street improvements consisting of curbs, sidewalks, gutters and street trees (69) are planned along the portions of Ashworth Avenue North and North 135th Street that abut the school campus.

Construction activity is slated to begin in the summer of 2009 and is expected to last for approximately eight (8) months.

Public Comments

The required public comment period for this project originally ended on October 22, 2008 and was later renoticed (due to sign installation issues) which resulted in one (1) additional public comment period ultimately ending on November 13, 2008. During and after the public comment period, DPD received numerous comment letters, emails, postcards and binders of material from Ingraham neighbors, students, faculty, parents, tree enthusiast and the general public in support and in opposition to the proposal. Most of the supporters approve of the proposed school improvements and encourage DPD to not further delay project or add further expense to the tax payer. Conversely, members of the public opposed to the proposal mainly cited concerns about negative impacts associated with the removal of several mature trees on site. Concerns about parking impacts, loss of aesthetic screening, erosion impacts to Haller Lake, property values and construction related impacts were also voiced.

A neighbor submitted a signed petition with several hundred signatures to DPD requesting a public meeting. An evening meeting, organized by DPD, was held on November 18, 2008 in the Ingraham High School Cafeteria. Two (2) DPD staff members (Land Use Planners) and one (1) SDOT employee (City Forester) facilitated the meeting. About 140 attendees were present. The agenda items discussed focused on the proposal description, an overview of the SEPA process and project milestones. During the public comment segment of the meeting, forty-seven (47) members of the public verbally reiterated the concerns/comments noted above. Several additional written public comments and a petition signed by 302 Ingraham students and faculty in support of this SEPA proposal was delivered to the Land Use Planner at the conclusion of this meeting.

ADDITIONAL BACKGROUND INFORMATION

Parking Agreement

In 1958, the governing bodies of the District and DOPAR at that time (Board of Directors of the Seattle School District No. 1 and the Board of Park Commissioners of the City of Seattle) entered into an informal written agreement that allowed the upper parking area on the Helene Madison Pool property (approximately 60,432 sq. ft.) to be developed and maintained by the District in exchange for the East Forest (approximately 34,884 sq. ft.) on the District's property to be developed and maintained by DOPAR for park and recreational purposes. Past DPD records indicate the District has historically included the abovementioned DOPAR property as part of its development site in order to meet the institution's total onsite parking requirement: and, as such, the existing upper parking area and vehicular access between the two (2) properties has been configured with the assumption that this parking area was considered as accessory parking to Ingraham High School-not accessory parking to the DOPAR pool facility. DOPAR recently communicated to the District that this informal parking arrangement would no longer be allowed. As a result, the District's MUP submitted site plans no longer depict DOPAR owned property as being included in its development site configuration. However, further discussion as to how this site alteration affects existing and future onsite parking requirements for the Ingraham property is warranted.

Per SMC 23.44.017.F.1 and 2, required public school parking must be provided on the school site. According to the Chart C for section 23.54.015 that explains parking quantity requirements for secondary public schools, “*when an existing public school on an existing public school site is remodeled, additional parking is required if any auditorium or other place of assembly is expanded or additional fixed seats are added. Development standard departures may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79 to reduce the required or permitted number of parking spaces.*” This proposal does not involve the expansion of an auditorium, place of assembly or an addition of fixed seating. However, it does create a unique situation-that being code required public school parking being met offsite. Since the erection of the school, existing code required parking accessory to the school has been allowed to be situated offsite without the granting of development standard departure related to parking location. After extensive permit research related to both properties, DPD has made the determination that the school currently has a parking deficit and this existing parking arrangement is recognized as being an established nonconformity to current zoning regulations (SMC 23.42.102). Per SMC 23.42.112, developments nonconforming to development standards may be maintained but shall be prohibited from altering in any manner that increases the extent of nonconformity or creates additional nonconformity. The dissolution of the existing informal parking agreement would essentially decrease the school’s required parking amount from 282 parking stalls to 117 parking stalls. It is for this reason that DPD advised the District to choose between the following options:

- Pursue a development standard parking departure to allow the net loss of code required parking; or
- Obtain a formal agreement from DOPAR.

The DOPAR Sr. Real Property Agent (Marylou Whiteford) has submitted a memorandum with attachments to DPD advising that effective December 15, 2008, the original 1958 parking arrangement has been replaced by two (2) documents signed by the Seattle Public School’s Executive Director of Facilities and the DOPAR Superintendent providing for continuation of the District’s use of park property; a temporary Right of Entry and a Reciprocal Lease Agreement. The temporary Right of Entry allows the District to continue use of the Helene Madison Pool property and make changes to it until formal authority from each agency’s respective governing bodies (i.e., the School Board and the City Council) can authorize the Lease to be acquired. The Reciprocal Lease Agreement allows the District to continue use of the park property. There is concern that the terms cited in the two (2) aforementioned documents-specifically alterations to parking and associated landscaping improvements to the park property-aren’t reflected on the Districts plans. Therefore, DPD will require the District to provide written evidence that its governing body authorizes the Lease and that the terms will be met in a timely fashion.

Previous SEPA Related Actions

Prior to application for a Master Use Permit, the District exercised its prerogative to act as lead agency and on January 31, 2008 issued an appealable SEPA threshold determination of non-significance (DNS). On February 1, 2008, the District submitted their MUP application (filed under #3007650) which included documents and plans to DPD for review. During the District’s SEPA appeal period, twelve (12) comments and one (1) appeal was received. Upon review of the comments, the District decided to withdraw the DNS and revise the checklist in order to address the comments and appeal. On May 7, 2008, a revised environmental checklist and DNS was issued. Nine (9) appeals were then filed. After reviewing testimony and exhibits provided during the appeal hearing, a non-City Hearing Examiner affirmed the District’s threshold determination on July 22, 2008.

During the month of August and once the District's appeal process had been completed, the District withdrew all of their permit applications from the City with the intent to remove some of the trees from the campus. A court order (filed under No. 08-2-26887-0SEA) was issued to not allow the trees to be removed. Subsequently on September 8, 2008, the District resubmitted their land use (#3009549) and construction applications with DPD and new application numbers were created.

For the purposes of this permit application, exercise of substantive SEPA authority by the DPD is limited to conditioning only. Conditioning pursuant to this authority will rely on the threshold DNS issued by the District and on environmental documents prepared by the District.

ANALYSIS – SEPA

Environmental impacts of the proposal have been analyzed in environmental documents prepared by Seattle School District. These include a Revised SEPA Checklist dated May 7, 2008 and a Determination of Non-Significance issued by Seattle School District dated May 7, 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, arborist reports, wildlife assessment report and renderings), comments and supplemental information provided by the public 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; 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, and construction traffic and parking related impacts follows.

Noise

The Ingraham site abuts three streets; Ashworth Avenue North, North 135th Street and North 133rd Street. Residential properties are situated across the abovementioned streets; west, north and south of the project site. Passenger vehicular traffic, 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 modular building 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 alterations, the SEPA checklist and Appendix D (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 daytime hours during weekdays 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. Additionally, the indirect impact of construction activities including construction worker commutes, truck trips, the operation of construction equipment and machinery, and the manufacturer 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, fuel-powered equipment and commercial construction vehicle exhaust are the most likely types of emissions. The following measures are cited in the SEPA checklist and Appendix D (Construction Requirements) to reduce or control emissions during construction:

- Site-specific development would comply with PSCAA's regulations concerning construction activity.
- During excavation and construction, debris and exposed areas would be sprinkled as necessary to control dust.
- Truck wheels and undercarriages would be brushed and/or washed before exiting project site.
- Truck loads and routes would be monitored to minimize dust-related impacts.
- Well-maintained construction equipment would be used to reduce emissions.
- Prolonged periods of vehicle idling would be avoided.
- Construction material deliveries to and from the project site would be coordinated to minimize congestion during peak travel times on adjacent streets.

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.

Earth

The majority of the proposed excavation, school construction and alterations are located a sufficient distance away from the identified ECA Steep Slope areas. Conversely, the proposed sidewalk construction and tree removal will be in close proximity and/or located at the bottom of the Steep Slope area at the southwest corner of the subject site. The ECA Ordinance and Directors Rule (DR) 3-2007 requires 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 an ECA Geologic Hazard Assessment Report dated October 18, 2007 and a Geotechnical Investigation Report dated November 8, 2007; both prepared by Steven E. Greene, L.E.G. and Lorne A. Balanko, P.E. (HWA Geosciences Inc.). These reports evaluate the soil and site conditions and provide recommendations for erosion and drainage controls, grading, earthwork and foundation construction.

The summary of the ECA Geologic Hazard Assessment Report findings is the following: *“Our assessment indicates that the slopes under consideration have been developed as a fill consisting primarily of granular, silty sands and gravels of glacial origin (glacial till), likely derived from excavation of the site in areas to the north and east, for purposes of overall site grading. The test pit logs (PSI, 2000) indicate that the fill is of loose to medium dense condition and, based on the apparent uniformity of the slopes, it is anticipated that it was placed under controlled conditions....it is our view that this slope is stable. As currently proposed, the intended future use of the site will not require appreciable modification of the existing slope and, therefore, does not create an impact to local slope stability. In our opinion, provided that discharge of surface water onto the slope is controlled, and the landscaping is maintained, the existing slopes do not pose a significant hazard to the proposed project. We consider that the risk of a deep-seated slope failure that could impact the sidewalk is very low.”* This report is located in the project file.

The summary of the Geotechnical Investigation Report findings is the following: *“The project site is underlain by up to 6 feet of fill soils, depending upon location. Within the location of the proposed new building footprint, our borings indicate depth to dense till ranges from 2.5 to 5 feet. Below the fill, and extending to termination depth of the explorations, glacial till was present. All borings were terminated at a depth of 11.5 feet below the existing ground surface. Glacial till is a mixture of silt, sand, gravel, cobbles and boulders that has been glacially overridden and, consequently, has high sheer strength and low compressibility. The glacial till soils were generally moist and we do not anticipate the need for any construction dewatering. Typical spread or strip footings may be used to support the new classroom building structure.”* 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 reports in association with submitted plans and has deemed this soils report to be relatively complete for this proposal. The soils reports, 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.

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 is slated to begin in May of 2009 and end during the month of December 2009. Initial construction of the proposed additions and street improvements are planned to occur during the summer months while school isn't in session. Substantial completion of the main school addition and alteration of the onsite parking areas are intended to happen during the months while school will be in session. Students and faculty will remain on campus during construction and no academic programs are planned to be moved offsite. As a result, the existing modular building and portables will continue to be occupied and aren't expected to be removed until after the occupancy of the new classrooms has been allowed. Once removal of the existing modular building and portables takes place, the reconfiguration of the south parking lot will occur at the final stage of construction. During this five (5) month 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 forty-five (45) construction workers will be working onsite at any given time during construction. It is anticipated that future contractors will use the existing vehicular access points abutting Ashworth Avenue North and North 135th Street for the duration of the construction project. The lawn area situated north of the main building's north façade will be dedicated for use by the construction employees for storage, deliveries, lay-down areas, staging, access to the building and other related construction uses. Construction flaggers may be used (as needed) at Ashworth Avenue North or North 135th Street to assist vehicles approaching and leaving the site.

Per the District, some dedicated construction employee parking will be provided onsite during the summer while school isn't in session. 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 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 and special events during the proposed construction period.

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 air quality, traffic, parking, plants and wildlife is warranted.

Greenhouse Gas Emissions

Emissions from the generation of greenhouse gases due to the increased energy and transportation demands may be adverse but are not expected to be significant due to the relatively minor contribution of emissions from this specific project. The other impacts such as but not limited to, increased ambient noise, and increased demand on public services and utilities are mitigated by codes and are not sufficiently adverse to warrant further mitigation by condition.

Transportation

Mirai Transportation Planning & Engineering prepared a Parking and Traffic Analysis Report (dated April 15, 2008) for this proposal. 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 Ingraham High School from 1,200 to 1,400 and makes the assumption that, as part of the proposed project, the parking lot situated on the adjacent DOPAR property would no longer be available for school use.

Traffic

Public roadways that serve this site include North 130th Street south of the athletic fields, Ashworth Avenue North to the west of the site, North 135th Street to the north of the site, North 133rd Street and Meridian Avenue North to the east of the site (east of Helene Madison Pool). King County Metro Routes 345, 316 and 346 provide direct service to the Ingraham campus with transit stops along North 130th Street and Meridian Avenue North.

The traffic volume resulting from this project was estimated by varying trip rates based on the following assumptions:

- The existing student population (1,200 students) would retain the current demand profile for parking facilities and for automobile trips. Therefore, an existing trip rate of 0.10 trips per student was used to calculate existing conditions during the peak hour of school activity.
- The trips associated with the additional student enrollment (200 students) are assumed at a rate of 0.28 trips per student as noted in the *Institute of Transportation Engineers (ITE) Trip Generation Manual (7th edition)* for the category of “High School”.
- Daily trips are also based on the *ITE Trip Generation rates* plus a 1.0 percent growth rate on area roadways to reflect traffic increases.

The report states the increase in student population from 1,200 to 1,400 students in the future would generate approximately 342 net new daily trips, of which 56 new trips would be generated during the PM peak hour (2:00 p.m. to 3:00 p.m.).

The transportation report identified four (4) intersections for analysis during the weekday PM peak hour (2:00 p.m. to 3:00 p.m.) for operational characteristics. The table below illustrates each intersection’s existing level-of-service (LOS) and forecasted LOS with the proposed project; presuming future distribution of traffic to the site would change to reflect the location and size of the parking facilities and that existing access to the campus through the Helene Madison Pool parking area via the identified Meridian Avenue North/East Driveway intersection would no longer be allowed during school hours. The identified delays are divided into several grade levels, ranging from LOS A (minimal) to LOS F (long delays).

Intersection	Existing LOS (1,200 Students)	Future LOS (1,400 Students)
Ashworth Avenue North/West Driveway	A	B
North 135 th Street/Burke Avenue North (North Driveway)	B	A
North 135 th Street/Meridian Avenue North	B	B
Meridian Avenue North/East Driveway	B	----

The LOS analysis indicates all of the studied intersections will operate at LOS B or better during the weekday PM peak hour. This is considered a good level of service. Per the report the decline at the west driveway would primarily affect people leaving the south school parking area via this driveway; this would not impact regular traffic on Ashworth Avenue North.

In summary, the proposed project in conjunction with the forecasted increase in student enrollment at Ingraham High School to 1,400 students would result in a net increase in overall traffic volumes at the site compared to existing conditions. Additionally, it is forecasted that a small increase in traffic delay would occur when exiting from the south parking lot (“west driveway”) would be minimally impacted. Overall, it is predicted that this increase of additional trips will not adversely impact the existing levels of service of the identified intersections. 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 117 parking spaces onsite distributed amongst three (3) distinct surface parking lots; south parking lot (47 stalls), auto shop parking lot (5 stalls) and the east parking lot (65 stalls). The submitted MUP plans indicate a total of 160 surface parking spaces are provided and no alteration to the non-conforming thirteen (13) parking stalls is proposed. Vehicular access to the surface parking spaces will remain unchanged.

Per the submitted plans, the total required onsite parking quantity for the campus equates to 625 parking stalls. The Land Use Code states parking is required when an expansion of an existing public secondary school's auditoria and/or public assembly rooms (i.e. cafeteria, gymnasiums, athletic field seating) is proposed. No expansion or creation of the aforementioned public assembly areas is proposed and an increase in the onsite parking supply is planned (56 new stalls). However, a clarification in the configuration of the common boundary line between the District and the DOPAR properties which converted the upper north parking area, historically presented by the District and reviewed by DPD as part of the Ingraham campus, to offsite parking accessory to Helene Madison Pool necessitates the District to provide analysis that addresses possible parking impacts associated with this unique parking arrangement and the planned student population increase from 1,200 to 1,400 students at Ingraham High School.

As described in the Mirai Parking and Traffic Analysis Report (dated April 15, 2008), a parking utilization study was conducted within approximately 0.2 miles of the school entrance with intent to determine the number of parking spaces available during a typical school day 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. Based on current parking supply, 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 35%. In comparison, parking demand during the typical school day showed a 157% parking utilization within the high school's parking lots; 82 parked vehicles on the DOPAR property; and 33% to 50% parking utilization on streets surrounding the high school campus.

This parking utilization study also included analysis concerning parking availability during high school events, such as football games. Mirai collected parking data on two (2) Friday evenings, a non-football game night (September 21, 2007) and the homecoming football game (September 28, 2007), to assess the potential parking impact on adjacent neighborhoods. The study found that on the non-football game night, there were few parking spaces occupied on campus and the parking throughout the neighborhood was 0% to 50%, mainly due to residential parking. In comparison, the parking demand on the football night showed 100% parking utilization within the school's parking lots and high parking utilization percentages on the following streets surrounding the campus: the west side of Ashworth Avenue North (100%); the school bus loading zone along North 135th Street (60%); and the north side of North 133rd Street, west of Meridian Avenue North (81%).

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 the an expected future 1,400 student enrollment at Ingraham and the exclusion of the DOPAR upper parking area. Based on field results, the peak parking demand for the existing student population (1,200 students) is 184 parking spaces. Using *Institute of Transportation Engineer's (ITE) Parking Generation (3rd*

edition) average demand rates for suburban schools, Mirai's analysis showed that 56 additional parking spaces would be required to meet the future parking demand for the additional 200 students. As a result, a total of 240 (184+56) parking spaces would be required to meet the peak parking demand. Additionally, a total of 287 (246+ 41) parking spaces would be required to meet the peak parking demand during high school events.

In summary, it is estimated that there will be a total parking demand for 240 parking spaces during school hours and 287 parking spaces during high school events. A total of 173 surface parking spaces will be provided onsite. With a 1,400 student population, there would be a deficit of 67 (240-173) parking spaces during a typical school day and 114 (287-173) parking spaces during a school event. If spillover parking does occur, the parking studies indicate that, with the addition of seventy (70) newly created parking spaces as a result of street improvements along the school's frontage on Ashworth Avenue North and North 135th Street, this parking could be accommodated on the neighboring streets. The Mirai report offers the following mitigation to further offset this onsite parking deficit:

- Promote transportation and parking management strategies to promote student use of public transit, ridesharing, walking and bicycling and to control offsite parking impacts. If daily parking needs are not met, investigate the potential for shared parking with nearby uses.
- Work with the neighborhoods to identify student parking impacts on residential streets. Coordinate with the City of Seattle to control and enforce on-street parking impacts in the adjacent neighborhoods as required.

DPD concurs that the mitigation is appropriate. However, a more concrete method to address these deficits would be to implement a formal parking agreement with DOPAR. Therefore, in order to mitigate future parking spillover in a more tangible manner, a condition will be added to require the District to acquire a formal lease agreement with DOPAR that allows continual usage of the identified north upper parking area.

Animals

It is the City's policy, as articulated in SMC 25.05.675.N, to minimize or prevent the loss of wildlife habitat which have substantial aesthetic, educational, ecological and/or economic value. Pursuant to this policy, if a proposed project is found to adversely impact wildlife habitat, wildlife travelways or wildlife habitat diversity then further mitigation may be required. Comment letters received indicate that wildlife-specifically eagles, hawks and band-tail pigeons has been observed by neighbors in and around the Northwest Tree Stand. The planned removal of several mature trees from this area of the site could negatively impact the survival of existing spawning, feeding or nesting areas of the birds. Consequently, further discussion of wildlife habitat impacts associated to the proposed project is warranted.

Included with the District's application to DPD is a Habitat Assessment and Landscape Plan Evaluation dated April 11, 2008 prepared by Linda Krippner, wildlife biologist (ESA Adolfson). This report indicates the following conclusion: *"Based on our review of Director's Rule 6-2001, the exceptional tree review (Cascade Design Collaborative, 2007), and field investigations; the project proposal meets the intent of SMC 25.05.675.N.2a, 2c, and 2d. Native forest habitat will be preserved on the east portion of the site and landscaping will include native species. Trees removed in the northwest tree stand will be replaced with additional native conifer trees planted in the remaining stand and in other landscape areas. Site redevelopment is also designed to meet the*

goal of no net loss of tree canopy allowing for tree-maturation over time. No exceptional trees were identified in the Exceptional Tree Review at Ingraham High School (Cascade Design Collaborative, 2007). We disagreed with this conclusion as we observed several Pacific madrone trees and other trees in the east forest that likely meet the criteria for being exceptional in accordance with Seattle’s Director’s rule 6-2001. None of these trees will be affected by the project. In addition to the planned mitigation measures, ESA Adolfson recommends that the following measures be considered for incorporation into the final plan in order to improve wildlife habitat conditions:

- *Remove non-native invasive species including English ivy, Scot’s broom, English holly from the east forest, and replace them with native shrubs to prevent their re-establishment and enhance this forest area.*
- *Use additional native species for landscape plantings.*
- *Retain at least portions of the existing dead/dying trees for cavity-nesting wildlife in the northwest forest stand if possible considering safety concerns.*
- *Minimize impacts to breeding birds by removing large trees outside of the breeding season, late summer through winter.*
- *Continue to remove invasive plants in all forest and landscaped areas, and enhance these areas with native plantings until these areas are well established with dense native plant communities reflective of the Douglas fir – Pacific madrone/salal association existing on the site.”*

DPD has reviewed this report and finds its findings and mitigation measures appropriate. Additionally, DPD has verified that the identified mitigation measures have been incorporated on the submitted landscape plans. Therefore, no additional conditioning or mitigation pursuant to SMC Chapter 25.05.675.N is warranted.

Plants

Per SMC 25.05.675.N, Seattle’s SEPA Plants policy aims to “*minimize or prevent the loss of wildlife habitat and other vegetation which have substantial aesthetic, educational, ecological, and/or economic value. A high priority shall be given to the preservation and protection of special habitat types....A high priority shall also be given to meeting the needs of state and federal threatened, endangered, and sensitive species of both plants and animals.*”. Additionally, SEPA policy suggests mitigation or denial of a project if it is found, “*...that a proposed project would reduce or damage rare, uncommon, unique or exceptional plant...or habitat diversity for species (plants or animals)....*”. In this instance, several existing mature trees situated in the Northwest Tree Stand have the potential to be affected by the proposed project. The proposal includes an expansion of the existing school that will extend into the Northwest Tree Stand which is comprised of the following tree species: Douglas-fir, Western Red cedar and Pacific madrone. As a result, approximately seventy-two (72) mature trees (49 Douglas-firs, 10 Western Red cedars and 13 Pacific madrones) out of a tree population of 133 are proposed to be removed. Public comment indicates Washington State Department of Natural Resources has classified habitat containing Douglas Fir, Pacific Madrone and Salal habitat as a “rare plant community” in King County; thus, the Northwest Tree Stand should be considered a unique environmental habitat area and no tree removal should be allowed. Therefore, further discussion of the ecological value of Northwest Tree Stand is warranted.

The applicant provided the following technical documents to DPD to support their evaluation of the ecological value of the Stand:

- An *exceptional tree review* memo prepared by Margaret Harrison, certified arborist (Cascade Design Collaborative, Inc.) dated October 22, 2007.
- A report titled “*Ingraham High School – Northwest grove of trees*” prepared by Margaret Harrison, Certified Arborist (Cascade Design Collaborative, Inc.) dated May 1, 2008.
- A report titled “*Assessment of Construction Impacts and Mitigation Plan for Area One at Ingraham High School*” prepared by Scott D. Baker, Certified Arborist/Certified Tree Risk Assessor and Sean Dugan, Certified Arborist/Certified Tree Risk Assessor (Tree Solutions Inc.) dated May 2, 2008.
- A report addendum to the “*Assessment of Construction Impacts and Mitigation Plan for Area One at Ingraham High School*” report prepared by Sean Dugan, Certified Arborist/Certified Tree Risk Assessor (Tree Solutions Inc.) dated May 7, 2008.
- A memo titled “*Additional Information*” prepared by Scott D. Baker, Certified Arborist/Certified Tree Risk Assessor (Tree Solutions Inc.) dated October 20, 2008.
- A report titled “*Ingraham High School Renovation Project: Plant Association Comparison between Project Location and Washington State Department of Natural Heritage Program (WNHP) Reference Sites*” prepared by Catherine Conolly and Rachel Hulscher (ESA Adolfson) dated October 17, 2008.

In addition to the reports provided by the District, an additional arborist’s report prepared by Tina Cohen (Northwest Arborvitae) dated May 21, 2008 for concerned neighbors (Save the Trees) was submitted. The report concluded, “*The tree removals are in direct contradiction to the stated goals of Seattle’s Urban Forest Management Plan. While it’s a good idea to add trees and other plants to the Ingraham campus, there will be a gap of at least 20 years before possible equivalence to the previous canopy coverage. And as discussed, the viability of the new trees is questionable because of crowding and problems with the proximity to paved surfaces. The SEPA determination should be reversed and the development redesigned so the northwest stand remains intact. The community including the Seattle City Council recognizes the need to preserve these trees, especially since this is public property.*”

The applicant’s arborists’ reports collectively make the following points:

- No trees in the Northwest Tree Stand meet the criteria for being exceptional in accordance with DPD Director’s Rule 6-2001.
- The Northwest Tree Stand does not currently qualify as a good example of the tree/plant association habitat because the forest floor does not have adequate species diversity and mid-story stratum is lacking. In comparison, existing plant communities that do meet the definition of the Douglas Fir/Pacific Madrone/Salal associations are located at West Tiger Mountain and Seward Park.
- The Northwest Tree Stand could eventually be restored if pedestrian access is prohibited, debris is not removed and grass is allowed to grow without mowing. However, given its isolated location understory plantings may be inconsistent with visual access and safety considerations at the school site. These conditions do not meet the District’s mission of education and goals for student safety.

SMC 25.05.675.N.2.b states in part that projects which are proposed within an identified plant habitat shall be assessed to determine the extent of the adverse impact and need for mitigation. As noted above, the Northwest Tree Stand does not currently qualify as a good example of the tree/plant association habitat. Nevertheless, the applicant has identified a SEPA impact from the

loss of 72 mature trees which must be mitigated. The District has identified the following mitigation measures within the Northwest Tree Stand:

- Approximately thirty-two (32) new trees, understory plantings are proposed to be planted.
- Additional protections for soil and root zones would be proposed for the existing trees by maintaining a 3"-4" layer of mulch for at least five (5) years construction.
- Additional construction restrictions to protect trees.
- Onsite observations of site clearing operations by a Certified Arborist.
- Onsite inspections during construction to monitor retained trees and vegetation.
- Monitoring of new landscape plantings during establishment by a Certified Arborist.

DPD in consultation with the Seattle Department of Transportation (SDOT) City Forester, have reviewed the identified reports and concur with the District's findings that the Northwest Tree Stand does not meet the criteria of the Douglas Fir/Pacific Madrone/Salal plant association as defined by the Washington Department of Natural Resources Natural Resources Natural Heritage Program and considers the proposed mitigation measures appropriate. Therefore, no additional conditioning or mitigation pursuant to SMC Chapter 25.05.675.N is warranted.

DECISION - SEPA

The environmental checklist, Master Use Permit plans submitted on the project, public comment 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 *Ingraham High School Renovation, Demolition and New Construction 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.

CONDITIONS - SEPA

Prior to Issuance of the Master Use Permit

1. The owner(s) and/or responsible party(s) will be required to submit written evidence that its governing body (Seattle School Board) authorizes the Lease and that the terms identified in the Right of Entry Agreement and/or Reciprocal Lease Agreement will be met in a timely fashion.

Prior to the Issuance of the Demolition or Building Permit

2. 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.

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

Prior to issuance of Certificate of Occupancy

5. Submit a copy of the final Reciprocal Lease Agreement to the Land Use Planner (Tamara Garrett 684-0976) or a written statement signed by both agencies acknowledging that agreed upon terms have been addressed sufficiently and details regarding final approval status.

For the Life of the Project

6. The Seattle School District must fulfill the terms identified in the Reciprocal Lease Agreement. If either parties (Seattle School District or Department of Parks and Recreation) decides to terminate the lease, the District must consult with DPD at least one (1) month in advance to determine whether or not a school standard parking departure will be required.

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

Date: January 22, 2009