



City of Seattle

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**Department of Planning & Development**  
Diane Sugimura, Director

**CITY OF SEATTLE  
ANALYSIS AND RECOMMENDATION OF THE DIRECTOR  
OF THE DEPARTMENT OF PLANNING & DEVELOPMENT**

**Application Number:** 3011263  
**Applicant Name:** King County, Department of Natural Resources,  
Wastewater Treatment Division  
**Address of Proposal:** 4215 36<sup>th</sup> Ave. W.  
**Council File Number:** 3010900

**SUMMARY OF PROPOSED ACTION**

Council Land Use Action for construction of a one-story 4,087 sq. ft. office building accessory to the West Point Treatment Plant in an environmentally critical area. Project includes 1,000 cubic yards of grading. Determination of Non-Significance prepared by King County.

The following approval is required:

**Council Conditional Use – to allow minor reconfiguration of an existing sewage treatment plant - SMC 23.51D.002**

**SEPA – to condition pursuant to SMC 25.05.660**

**SEPA DETERMINATION:** [ ] Exempt [X] DNS\* [ ] MDNS [ ] EIS

[ ] DNS with conditions

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

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The King County Department of Natural Resources and Parks, Wastewater Treatment Division, issued a Determination of Non-Significance in this matter on June 10, 2010.

## **BACKGROUND DATA**

### **Site and Vicinity Description**

The West Point Treatment Plant (the Plant) is located about four miles northwest of downtown Seattle on the shores of Puget Sound and in Discovery Park. It is part of King County's regional system that treats wastewater for about 1.5 million people and covers 420 square miles in the Puget Sound region. West Point Plant treats wastewater and stormwater from homes, offices, schools, agencies, businesses and industries in Seattle, north King County, south Snohomish County, and some areas of Lake Washington.

Planning for the Plant began in 1958, when voters in Seattle and King County created Metro, an agency charged with developing and operating a regional wastewater treatment system.

In 1966, construction of a primary treatment plant was completed at West Point.

In 1994, resulting from a voter approved proposal to merge Metro with King County, King County assumed responsibility for West Point Plant.

In 1991, to comply with the 1972 federal Clean Water Act, Metro began an expansion of the Plant to provide secondary treatment. Expansion and upgrading to secondary treatment was completed in 1996. The average capacity for wet weather flow is 133 million gallons per day. The maximum capacity is 440 million gallons per day during peak storms.

West Point Treatment Plant is surrounded by retaining walls, berms, and extensive native landscaping to blend in with the surrounding Discovery Park.

### **Proposal Description**

Construction offices used for the secondary treatment expansion were kept on site and were used continuously since that time for capital projects offices for upgrades and construction activities on the site. The Plant usually has a number of construction projects to maintain the facilities or meet new regulatory requirements. In 2009 the trailers were removed from the site due to age, disrepair, and hazardous conditions.

Since this time, there has been a shortage of office space for existing staff. As a result of a space needs review, it was determined that a 4,078 square foot (SF) Administrative Office Annex (the Annex), with office space for eleven-to-twelve (11-12) existing employees and associated functional areas, together with an exercise facility was needed. Efficiencies are gained by locating the displaced staff as close as possible to the existing administration building. Staff that will occupy the proposed office space work at the Plant in operations, capital improvements and computer networks. They attend meetings and interact with other administrative staff. All staff to occupy the proposed space are existing Plant employees. No new staff is proposed. A cost analysis showed that a modular office annex would provide the needed space and exercise room for approximately 50 years and at a considerable savings compared to an addition to the administration building.

Approximately 1,000 cubic yards of material will be excavated and hauled off the site during construction of the office annex to an approved disposal site outside of the City of Seattle limits.

### ANALYSIS—COUNCIL CONDITIONAL USE

The Seattle Land Use Code provides as follows: “The decision on an application for the expansion or reconfiguration of a sewage treatment plant is a Type IV Council land use decision.” (SMC § 23.51A.002 D) The Code then sets forth specific criteria that shall be considered in evaluating and approving, conditioning or denying proposals for the expansion or reconfiguration of an existing sewage treatment plant.

*D. Sewage Treatment Plants. The expansion or reconfiguration (which term shall include reconstruction, redevelopment, relocation on the site, or intensification of treatment capacity) of existing sewage treatment plants in single-family zones may be permitted if there is no feasible alternative location in a zone where the use is permitted and the conditions imposed under subsections 23.51A.002.D.3 and D4 are met.*

*2. Need for Feasible Alternative Determination. The proponent shall demonstrate that there is no feasible alternative location in a zone where establishment of that use is permitted.*

*a. The Council’s decision as to the feasibility of alternative location(s) shall be based upon a full consideration of the environmental, social and economic impacts on the community, and the intent to preserve and to protect the physical character of single-family areas, and to protect single-family areas from intrusions of non-single-family uses.*

There is no feasible alternative to co-locating Plant staff into one central location on the Plant site. The site is physically isolated from other non-single-family zones where office uses are allowed by a long access easement through Discovery Park. The proposed annex will be occupied by Plant staff with primary responsibilities for Plant operations. Exercise facilities will be located near the existing administration building to maximize the potential for optimum utilization by staff.

#### Environmental Impacts

Environmental impacts expected from the project would be temporary construction impacts identified and reviewed the proponent’s SEPA document, including exhaust emissions from construction vehicles and fugitive dust. No long term environmental impacts are expected.

#### Social Impacts

The proposed office annex is contained within the walls of the existing Plant. The office use is screened by high retaining walls, berms and native plantings. Visitors to the Plant will most likely not use the office annex. No social impacts from the proposal are expected.

#### Economic Impacts

The construction of the Office Annex will create short term construction jobs. No long term economic impacts are expected from the proposal.

Intent to Protect the Physical Character of Single-Family Areas

There are no nearby single-family uses in the surrounding Discovery Park. The closest are those set back from the bluff above the Plant and approximately 3,000 feet from the site. The proposed structure, within the perimeter walls of the existing West Point Treatment Plant, would be expected to isolate it from surrounding areas, including Discovery Park, sufficiently to avoid any negative impacts on the character of single family areas.

Protect single family areas from intrusions of non-single-family uses

The proposed office annex will have no impacts on single-family uses do to its great distance and near invisibility from any such uses.

Intrusion of non-single-family uses would not increase under the proposed project

The proposed office annex will have no impacts on single-family uses.

*b. The determination of feasibility may be the subject of a separate application for a Council land use decision prior to submission of an application for a project-specific approval if the Director determines that the expansion or reconfiguration proposal is complex, involves the phasing of programmatic and project-specific decisions or affects more than one site in a single-family zone.*

The West Point Office Annex Project is not a complex proposal. A construction trailer (3,360 square feet) was vacated and removed, and an exercise trailer (600 square feet) will be vacated, due to deterioration and code issues. These trailers and their functions will be replaced by the Office Annex.

This reconfiguration of work and exercise space does not involve the phasing of programmatic and project-specific decisions. The proposed office annex will house existing staff and uses that are integral the plant operations.

The reconfiguration does not affect more than one site in a single-family zone. The West Point Treatment Plant has been in its present 32 acre configuration since the late 1990's, since the secondary treatment upgrades.

A separate determination of feasibility does not appear warranted here.

**3. Conditions for Approval of Proposal.**

*a. The project is located so that adverse impacts on residential areas are minimized;*

The proposed office annex is located in an area that is tucked back against a high retaining wall along the east perimeter of the site and should not be visible from the exterior of the Plant. It is

screened from the south by the administration building. Views into the Plant are obscured by a perimeter wall and berm planted with native vegetation.

Landscaping will be provided to further screen and soften the 4,078 SF building. Existing standard lighting will be reused for no net increase in outdoor area lighting. Lighting is directed downward so as not to increase glare from the Plant.

*b. The expansion of a facility does not result in a concentration of institutions or facilities that would create or appreciably aggravate impacts that are incompatible with single-family residences;*

The proposed administrative office annex is not an expansion of the plant. It replaces an equivalent square footage of construction trailers that were part of the secondary upgrades. It houses existing staff, locating them close to the administrative building for added efficiencies.

*c. A facility management and transportation plan is required. The level and kind of detail to be disclosed in the plan shall be based on the probable impacts and/or scale of the proposed facility, and shall at a minimum include discussion of sludge transportation, noise control, and hours of operation. Increased traffic and parking expected to occur with use of the facility shall not create a serious safety problem or a blighting influence on the neighborhood;*

The Plant's Transportation Plan, developed as part of the 1996 secondary upgrade project conditions, would not change as a result of the proposal.

Sludge transportation would not be affected by this proposal.

No noise will be created by the Annex except temporary construction noise. Modular construction will minimize the amount of onsite construction noise. Construction in a manner and during hours as necessary to comply Seattle codified noise restrictions.

Hours of operation - The Plant is operated continuously.

No increased truck or passenger vehicle trips are anticipated, except for during the construction phase of the project when a minor amount of additional traffic would be expected. Truck traffic will be by the access road from W. Government Way. Delivery of modular units would be few in number, but would require pre-delivery route analysis for obstructions/clearance, turning radii, and feasibility.

*d. Measures to minimize potential odor emission and airborne pollutants including methane shall meet standards of and be consistent with best available technology as determined in consultation with the Puget Sound Clean Air Agency (PSCAA), and shall be incorporated into the design and operation of the facility;*

The Proposed Office Annex would not increase the generation of methane nor odor emissions or airborne pollutants.

The West Point plant itself is regulated under Puget Sound Clean Air Agency's Air Operating Permit #10088. Puget Sound Clear Air Agency inspects WPTP yearly for permit compliance.

Progress continues to be made in the control and use of methane gas generated. The methane produced from the digestion of wastewater is burned to power the raw sewage influent pumps, and 3 (three) boilers at the plant. WPTP is also constructing new co-generation units that will burn digester gas to produce energy for distribution by Puget Sound Energy

*e. Methods of storing and transporting chlorine and other hazardous and potentially hazardous chemicals shall be determined in consultation with the Seattle Fire Department and incorporated into the design and operation of the facility;*

The proposal would not have an effect upon the handling and use of hazardous and potentially hazardous chemicals at the facility.

The Plant currently uses gaseous chlorine to disinfect wastewater effluent. Most treatment plants no longer use chlorine for disinfection due to the potential health safety issues which could result from uncontrolled release. King County is evaluating methods to change its disinfection processes to Sodium Hypochlorite. The proposed Annex will not negatively impact or delay these disinfection upgrades. Storage of hazardous materials at the Plant is under various 801(c) permits on file with the Seattle Fire Marshal's Office.

*f. Vehicular access suitable for trucks is available or provided from the plant to a designated arterial improved to City standards;*

This project would not alter the existing access route via. W. Government Way.

*g. The bulk of facilities shall be compatible with the surrounding community. Public facilities that do not meet bulk requirements may be located in single-family residential areas if there is a public necessity for their location there;*

The proposed Annex will be 4,078 SF in gross floor area and will be 21 feet from grade at its highest point. The Annex replaces a two-story construction trailer that was visible from Discovery Park. The new Annex should not be visible from Discovery Park. The Annex will be landscaped, and be constructed with neutral and/or earth tones.

*h. Landscaping and screening, separation from less intensive zones, noise, light and glare controls and other measures to ensure the compatibility of the use with the surrounding area and to mitigate adverse impacts shall be incorporated into the design and operation of the facility;*

The proposed Annex project includes a detailed landscaping plan to soften and screen the Annex. Existing light standards in the paved area north of the proposed Annex will be reused and relocated. No increase in outdoor area light or glare is anticipated. Lighting will be directed downward and shielded to prevent errant light from creating light and glare to Puget Sound or the surrounding Discovery Park.

The positioning of the proposed Annex relative to the existing administration building will create a courtyard as a gathering place for employees and visitors. The Plant conducts tours, Earth Day events, and educational programs as part of its mission to promote a clean environment and protect public health. The courtyard will serve as a natural gathering place between the lobby of the administrative building and the Annex.

*i. No residential structures, including those modified for nonresidential use, are demolished for facility expansion unless a need has been demonstrated for the services of the institution or facility in the surrounding community;*

No residential structures shall be demolished or modified for nonresidential use.

### **RECOMMENDED DECISION—COUNCIL CONDITIONAL USE**

DPD recommends approval of the proposal.

### **RECOMMENDED CONDITIONS—COUNCIL CONDITIONAL USE**

None.

### **ANALYSIS-SEPA**

The Department of Natural Resources of King County is the SEPA Lead Agency. King County prepared a SEPA checklist and issued a Determination of Non-Significance. The information in the checklist, the supplemental information submitted by the applicant, the experience of the lead agency and the Department of Planning and Development with the review of similar projects from the basis for this analysis and conditioning decision.

The SEPA Overview Policy (SMC 25.05.665D) 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 such limited circumstances (see SMC 25.05.665.D.1-7), mitigation may be considered by the Department.

### **Short-term Impacts**

The project is likely to have short-term adverse, construction-related environmental impacts with respect to earth, noise, air, water quality, traffic and pedestrian circulation. No other elements of

the environment appear likely to be adversely affected, and no other elements have been identified in the SEPA document.

Air, Earth, and Water. The project is likely to cause some minor soil erosion from grading and other site work while the earth is exposed. Other potential impacts include decreased air quality due to dust and other particulates produced by construction equipment and operations, and tracking of mud and dirt onto adjacent streets by construction vehicles. These air and earth impacts are expected to be minor in scope and would be limited to the period of site preparation. Several adopted City codes and ordinances provide adequate mitigation. The Street Use Ordinance provides for watering the streets to suppress dust; the Stormwater, Grading and Drainage Control Code provides for mitigation of earth impacts related to grading and excavation, such as soil erosion and runoff and the Seattle Building Code provides for appropriate construction measures in general. The Puget Sound Clean Air Agency regulates to enforce limitations on the airborne emission of dust and other particulate material.

According to the SEPA Checklist approximately 1,000 cubic yards of cut and fill will be associated with the project. Soil stabilization will be assured by compliance with the Stormwater, Grading and Drainage Control Code and the Building Code. Further, Director's Rule 200-16 was developed to apply Best Management Practices (BMP's) to prevent erosion and sedimentation from leaving construction sites or where construction will impact receiving waters. The implementation of BMP's, as contained in the DR 200-16, is a requirement for permit approval. No significant erosion impacts are anticipated.

Construction activities including 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.

No conditioning pursuant to SEPA Policy authority regarding air, earth and water impacts is warranted.

Noise. Short-term noise from construction would be generated during working hours. Noise levels during construction would be expected to comply with codified City of Seattle standards. The remoteness of the proposal site from receptor sites, the presence of a perimeter wall and berm around the West Point site, and the limited nature of the proposed construction activity would further limit noise impacts expected to reach adjoining sites.

Circulation and Traffic. Pedestrian and bicycle routes would be affected during the construction period, particularly in Discovery Park surrounding the proposal site. These impacts would be limited to those occurring in the use of existing roads through the park and would be expected to be minor in nature due to the limited amount of construction traffic expected.

Parking. All construction related parking is expected to be contained within the perimeter wall of the existing treatment plant and no impacts are expected in surrounding areas.

