



City of Seattle

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: 3013035

Applicant Name: David Lewy, URS Corp. for
Kyle Landreneau, Shell Oil Products US

Address of Proposal: 2555 13th Avenue SW

SUMMARY OF PROPOSED ACTION

Land Use Application to allow the removal of above ground tanks, piping and Lube Facility's structures (Shell Oil Company). The project also includes 8,500 cubic yards of grading and revision to the stormwater system.

The following approvals are required:

SEPA - Environmental Determination - Chapter 25.05 SMC

SEPA DETERMINATION: Exempt DNS MDNS EIS
 DNS with conditions
 DNS involving non-exempt grading, or demolition,
or involving another agency with jurisdiction.

BACKGROUND DATA

Site and Vicinity Description

The site is located at the Shell Terminal on Harbor Island in a General Industrial 1 zone with an 85 foot height limit (IG1 U/85') and the Greater Duwamish Manufacturing Industrial area. The site is bounded by SW Lander Street on the south, 13th Avenue SW on the east, SW Florida Street on the north, and 16th Avenue SW on the west. The site is mapped as a liquefaction area due to fill.

Proposal Description

The proposed project is to remove the former Lube Facility's structures, tanks, piping and equipment at the Shell Seattle Terminal Facility. It also includes minor grading at the site after demolition of buildings and minor revision to the stormwater management system in the former Lube Facility area. The proposed project includes demolition of the following structures and associated piping and equipment:

- Blending Building
- Air Compressor Building
- Boiler House (Boiler Removal Only)
- East Warehouse and Ancillary Structure
- Lube Oil Loading Rack
- Northwest Tank Farm
- Pumphouse (Pump Removal Only) and Manifold Pit West
- Southeast Tank Farm
- Southwest Tank Farm
- West Warehouse
- West Warehouse Addition

Select piping and equipment will be demolished in the Pumphouse, Boiler House, and Manifold Pit West and the structures will remain in place. The tanks, equipment, valve pits and vaults will be completely removed and backfilled with native material and sand. Tank foundations and building footings will be removed to at least 18 inches below the ground surface and backfilled with native material and sand. Subsurface piping that is within 18 inches below the ground surface will be removed. Subsurface piping that is deeper than 18 inches below the ground surface will be cleaned, cut and capped and left in place. The underground storage tank will be remediated. Remediation methods, which may include abandonment in place or complete removal, will be determined by the Owner's representative and will be in accordance with applicable Federal, State, and local regulations. The demolished parts of the site will be regraded to match with the surrounding grades and the site stormwater management system will be revised to comply with the regraded site. The regrading involves excavation of approximately 7,500 cubic yards of soil (most of it is above ground excavation) and fill (native material and imported sand) of approximately 1,000 cubic yards.

Public Comment

One comment letter was received during the comment period which ended February 29, 2012. Concerns were expressed about the challenge to include industrial areas like this one as a partner in the City's resolve to increase the canopy of tree coverage in the City. Whenever a project like this is proposed, consideration of how and where natural and native vegetation can be included could be considered. These considerations could be asked of the developer and/or owner.

ANALYSIS-SEPA

The initial disclosure of the potential impacts from this project was made in the environmental checklist submitted by the applicant (dated February 7, 2012) and annotated by the Land Use Planner. The information in the checklist, the supplemental information submitted by the applicant and the experience of the lead agency with the review of similar projects form the basis for this analysis and decision.

The SEPA Overview Policy (SMC 25.05.665) 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 limitations/circumstances (SMC 25.05.665) mitigation can be considered.

Short-Term Impacts

Construction activities could result in the following adverse impacts: construction dust and storm water runoff, erosion, emissions from construction machinery and vehicles, increased particulate levels, increased noise levels, occasional disruption of adjacent vehicular and pedestrian traffic, and a small increase in traffic and parking impacts due to construction workers’ vehicles. Existing City codes and ordinances applicable to the project such as: The Noise Ordinance, the Stormwater Grading and Drainage Control Code, the Street Use Ordinance, and the Building Code, would mitigate several construction-related impacts. Following is an analysis of the air, water quality, streets, parking, and construction-related noise impacts as well as mitigation.

The Street Use Ordinance includes regulations that mitigate dust, mud, and circulation. Temporary closure of sidewalks and/or traffic lane(s) would be adequately controlled with a street use permit through the Seattle Department of Transportation, and no further SEPA conditioning would be needed.

Construction is expected to temporarily add particulates to the air and will result in a slight increase in auto-generated air contaminants from construction worker vehicles; however, this increase is not anticipated to be significant. Federal auto emission controls are the primary means of mitigating air quality impacts from motor vehicles as stated in the Air Quality Policy (Section 25.05.675 SMC). No unusual circumstances exist which warrant additional mitigation, per the SEPA Overview Policy.

Air

Greenhouse gas emissions associated with development come from multiple sources; the extraction, processing, transportation, construction and disposal of materials and landscape disturbance (Embodied Emissions); energy demand created by the development after it is completed (Energy Emissions); and transportation demands created by the development after it is completed (Transportation Emissions). Short term impacts generated from the embodied emissions results in increases in carbon dioxide and other green house gasses thereby impacting air quality and contributing 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 specific project. The other types of emissions are considered under the use-related impacts discussed later in this document. No SEPA conditioning is necessary to mitigate air quality impacts pursuant to SEPA policy SMC 25.05.675A.

Long-Term Impacts

Long-term or use-related impacts are also anticipated from the proposal: increased surface water runoff from impervious surfaces. This long-term impact is not considered significant because the impact is minor in scope. The long-term impacts will in part be mitigated by the City's adopted codes and/or ordinances. Specifically these are: Stormwater, Grading and Drainage Control Code (stormwater runoff by impervious surface); and the Seattle Energy Code (long-term energy consumption). Additional land use impacts which may result in the long-term are discussed below.

Greenhouse Gas Emissions and Other Impacts

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 construction of greenhouse gas emissions from this project. No further conditioning or mitigation is warranted pursuant to specific environmental policies or the SEPA Overview Policy (SMC 25.05.665).

Drainage

No drainage will be directed to the adjoining streets. Verification of an appropriate stormwater control system and its proposed location of connection to the public system will be required to be shown on the construction plans. No additional mitigation measures will be required pursuant to SEPA.

Earth

The SEPA checklist indicates that the site is developed and paved. Soil underlying surface pavements consists of dredge fill which is composed of fine to coarse sands with varying amounts of silt and gravel. The thickness of this layer is approximately 8 to 20 feet. Native estuarine deposits underlie the dredge fill. These deposits are composed of primarily fine sand with thin silt interbeds. Approximately 7,500 cubic yards of existing soil will be removed and 1,000 cubic yards of this soil (and imported sand) will be used to backfill over-excavations for footings, foundations, vaults, and valve pits etc. Remaining soil will be hauled offsite for disposal. Construction activities would include removal of foundations, footings, vaults, tanks, associated piping and equipment, surface asphalt, concrete, and subsurface materials. This excavation/removal could result in an increase in temporary erosion and sediment transport offsite. However, an approved Construction Stormwater Control Plan would be implemented as a condition of the project National Pollutant Discharge Elimination System (NPDES) Construction General Permit thereby minimizing risks of erosion during construction. The project would also be required to comply with the temporary erosion and sediment control (TESC) requirements of the City of Seattle's Stormwater, Grading and Drainage Control Code.

The total area of the site is 17.5 acres, of that 1.9 acres will undergo demolition activities (demolition of buildings, foundations, slabs). Following demolition activities in these areas, they will be converted to pervious surfaces by backfill with native material and the upper 4 inches with sand. The remaining areas of the site will remain impervious surfaces, which is approximately 89 percent. TESC measures during construction would include, but not be limited to the following measures. Catch basin filters could be used in catch basins located within the construction limits to prevent sediments and construction-related pollutants from entering the storm drainage system during construction. Periodic maintenance and replacement of filters will be performed. Stockpiles would be covered with plastic sheeting for impervious protection from rain, mitigating erosion or runoff. Street sweeping and vacuuming will be used to minimize project area sediment into the public drainage system. Portable sediment tanks, such as Baker tanks, shall be used to trap and retain sediment from sediment-laden water. The number of sediment tanks to be used shall be determined as construction proceeds onsite. Sediment filter socks will be used around storm drain inlets (i.e. yard drains, trench drains, etc.) onsite to prevent sediment from entering storm drainage systems prior to permanent stabilization of the disturbed area. Water will be used to control windblown fine materials such as soil, concrete dust and paint chips. The amount of water will be controlled so that runoff from the site does not occur, yet dust control is achieved. Plastic will be tied to the existing fence and holes will be cut in it to allow wind to pass through to prevent dust from entering surrounding areas. Therefore, no further mitigation of earth impacts will be required pursuant to Section 25.05.675 of the Seattle SEPA Ordinance.

Traffic and Transportation

The plans show a truck haul route during demolition and grading activities. Trucks will travel along 13th Avenue SW, SW Lander Street, Klickitat Avenue SW, SW Spokane Street and the Alaskan Way Viaduct. The amount of traffic expected to be generated by the proposed project is within the capacity of the streets in the immediate area. No development is proposed with this project, only demolition and removal of tanks, so no vehicular trips will be generated after the project is completed. Therefore, no SEPA mitigation of long-term traffic impacts is warranted.

SUMMARY

In conclusion, several adverse effects on the environment are anticipated resulting from the proposals which are nonsignificant and will be addressed by existing codes and ordinances discussed above. Therefore, no further mitigation of construction impacts will be required and no conditions will be imposed to mitigate specific impacts identified in the foregoing analysis, or to control impacts not regulated by codes or ordinances, per adopted City policies.

DECISION - SEPA

This decision was made after review by the responsible official on behalf of DPD as the lead agency of the completed environmental checklist and other information on file with the responsible department. This constitutes the Threshold Determination and form. The intent of this declaration is to satisfy the requirement of the State Environmental Policy Act (RCW 43.21.C), including the requirement to inform the public of agency decisions pursuant to SEPA.

- Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030(2)(C).

- Determination of Significance. This proposal has or may have a significant adverse impact upon the environment with respect to transportation, circulation, and parking. An EIS limited in scope to this specific area of the environment was therefore required under RCW 43.21C.030(2)(C).

SEPA - CONDITIONS

None.

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

Date: May 24, 2012