



City of Seattle
Edward B. Murray, Mayor

Department of Planning and Development
D. M. Sugimura, Director

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

Application Number: 3014619
Council File Number: CF # 312943
Applicant Name: Kim Baldwin for Seattle Department of Parks and Recreation
Address of Proposal: 5513 South Cloverdale Street

SUMMARY OF PROPOSED ACTION

Council Land Use Action to allow a 34,811 sq. ft. urban farm with five greenhouses, a classroom building and related farm and gardening structures (15,978 sq. ft. total) on an existing Seattle Parks nursery site (formerly Atlantic City Nursery) in an environmentally critical area. Determination of Non-Significance prepared by Seattle Parks and Recreation.*

*Note – The project has been revised from the original notice of application: “Council Land Use Action to allow a 22,575 sq. ft. urban farm with five greenhouses and related farm and gardening structures (13,575 sq. ft. total) on an existing Seattle Parks nursery site (formerly Atlantic City Nursery) in an environmentally critical area. Determination of Non-Significance prepared by Seattle Parks and Recreation.

The following approvals are required:

Council Land Use Action – To waive or modify development standards for a City facility (Seattle Municipal Code (SMC) Sections 23.42.051 and 23.54.030.E.3):

- to allow installation of mechanical equipment designed for commercial use;
- to allow urban farm structures’ total gross floor area to exceed maximum amount (1,000 sq. ft. maximum required, 15,978 sq. ft. proposed);
- to allow additional height for structures for an urban farm use in a residential zone (12’ required, 21’ maximum proposed);
- to allow vehicular parking maneuvering to occur within the right-of-way; and
- to allow urban farm planting area to exceed maximum quantity (4,000 sq. ft. required, 29,986 sq. ft. proposed).

SEPA – To impose conditions (SMC, Chapter 25.05)

- SEPA DETERMINATION:** Exempt DNS MDNS EIS
 DNS with conditions
 DNS involving non-exempt grading or demolition or involving another agency with jurisdiction.¹

¹SEPA Determination of Non-Significance issued by the Seattle Department of Parks on November 28, 2012.

BACKGROUND INFORMATION

Site and Vicinity Description

The project site is the former “Atlantic City Nursery” located in the Rainier Beach neighborhood of Seattle. This flag-shaped site area is approximately 6.9 acres bisected by an unimproved 10’ wide alley heading north-south direction. The site is zoned Single Family 5000 (SF 5000) with the southern areas of the site located in the Urban Residential (UR) and Conservancy Recreation (CR) shoreline environments. This property is bounded by South Cloverdale Street on the north; Park Drive South to the east; Lake Washington and a Sound Transit wetland mitigation area to the south; and residential property and Seattle Parks and Recreation (PARKS) property (Beer Sheva/Atlantic City Park/Pritchard Island Beach) to the south and west. Development on the site consists of five greenhouses, a tool shed building and related infrastructure.



An informal parking condition exists onsite. Vehicular access to the site is via an existing curb cut situated at the site’s northeast corner and at the intersection of South Cloverdale Street and Park Drive South. Both South Cloverdale Street and Park Drive South are considered as non-arterial streets, pursuant to SMC Chapter 23.53. South Cloverdale Street is partially improved with curbs, sidewalks, gutters and street trees. Park Drive South is an unimproved roadway covered by mature trees, grass and vegetation.

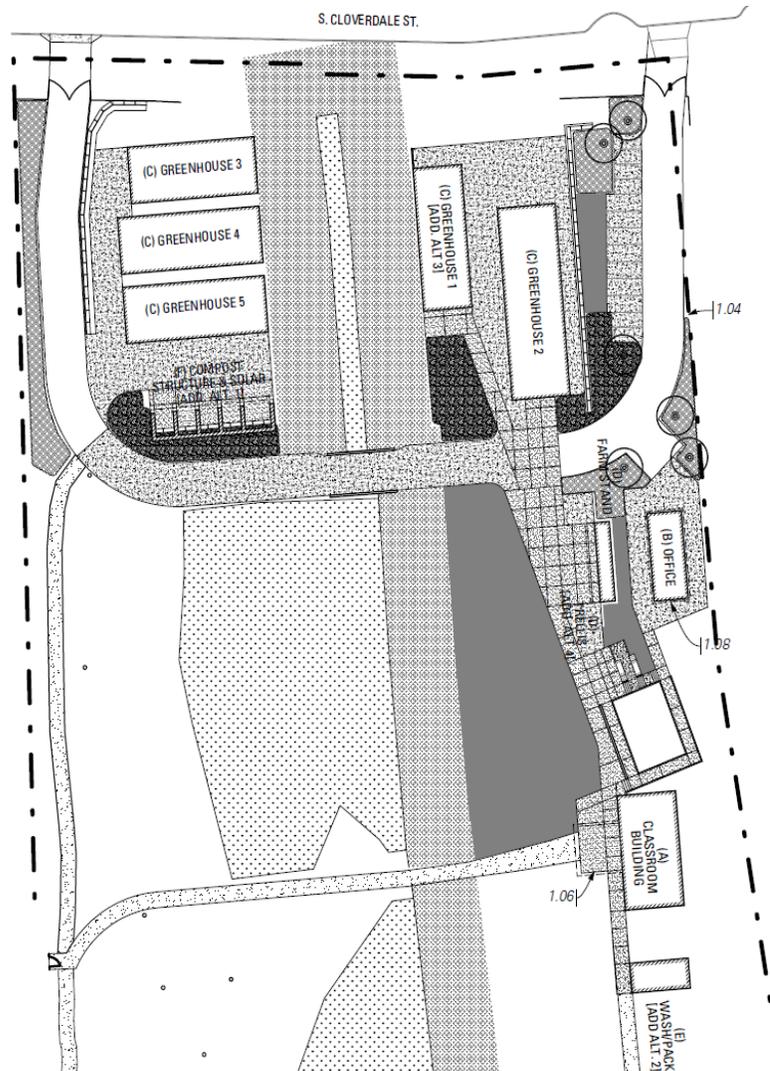
The site’s topography is flat with locations along the perimeter that reach approximately 36% slope. Mature trees and other vegetation exist on the park site. Portions of the site within the area of the former nursery are mapped the following Environmentally Critical Areas (ECAs): Liquefaction, Shoreline Habitat and Wetland. The submitted drawings indicate that proposed improvements will be located on dry land outside of the mapped shoreline environments:

therefore, the DPD shoreline exemption reviewer determined that no formal shoreline exemption is required. Based on technical reports, DPD concurred with PARKS's analysis that the proposal will have no negative impact on the wetlands or buffers. Consequently, DPD supported the ECA wetland exemption analysis prepared and approved by PARKS as permitted per SMC 25.09.045.

Surrounding properties north, south, east and west of the site are also zoned SF 5000. Existing development in vicinity of the subject property are single family residences to the west and the east; and PARKS's property (Pritchard Island Beach Park, Beer Sheva/Atlantic City Park) to the north and south.

Proposal

The Seattle Department of Parks and Recreation (PARKS) propose to renovate the existing Atlantic City Nursery property to establish an urban farm on a portion of the PARKS property (5.9 acres). The proposal includes the construction of four new one-story structures onsite: a 1,819 sq. ft. classroom with 472 canopy structure; a 952 sq. ft. covered compost structure; a 320 sq. ft. farm stand (altered shipping container); and a 472 sq. ft. farm processing (wash and pack) storage building. Four existing greenhouse structures (identified as greenhouse #1, #3, #4 and #5) approximately 8,147 sq. ft. in total will be disassembled and reassembled onto new foundations, situated at chosen locations on the park site. One existing greenhouse structure (identified as greenhouse #2) totaling approximately 3,006 sq. ft. will remain and be utilized for the proposed urban farm use. Renovation of the existing one-story 790 sq. ft. tool shed building is proposed. Improvements comprising of pedestrian/vehicular paths, pedestrian bridges, outdoor gathering areas, fencing, signage, farm animal housing (chicken coops, worm bins, apiaries) are also planned.



Fifteen parking spaces accessory to the urban farm use will be provided onsite at a surface parking area. Vehicular access to the proposed parking stalls and other areas of the urban farm would occur via an existing curb cut entrance located at the site's northeast corner and a proposed entrance near the site's northwest corner abutting South Cloverdale Street.

Grading of approximately 2,989 cubic yards (cu. yds.) of material is anticipated to occur during the removal of material/rockeries, construction of structure foundations, installation of retaining walls and rockeries, and installation of roadways and pathways.

Landscaping enhancements inclusive of installing a culvert, trees, plantings, planting beds and areas for agricultural work are proposed. Restoration of the identified wetland areas and buffer areas is also planned.

Additional Background Information

PARKS operated the subject site as a plant nursery until January 2010 when the facility was officially closed. Since then, PARKS has sought to transform this site into a long-term working urban farm and demonstration wetlands restoration property. In September 2012, PARKS entered into a City Council approved agreement (Ordinance #123967) with specific non-profit organizations (Seattle Tilth and Friends of Rainier Beach Urban Farm and Wetlands) to provide the overall management and operation of the urban farm and wetland preservation and enhancement project. Per PARKS, the property will remain PARKS property. The applicant states, *“The goal of the project is to produce fresh health food annually for families struggling with food security, provide educational opportunities for at-risk and under-served youth in the community, offer access to an education from a rare in-city natural wetlands environment, improve wetland habitat for native wildlife, foster much needed economic development and strengthen community. The project will provide public access to the site by way of Beer Sheva Park and connection to Pritchard Wetlands and Beach Parks. The farm will be managed and operated by Seattle Tilth and Friends of Rainier Beach Urban Farm and Wetlands through a City Council approved agreement. The property will remain a part of Seattle Parks and Recreation.”*

ANALYSIS – COUNCIL LAND USE ACTION

Public parks are City facilities permitted outright in SF 5000 zones. Urban farms with up to 4,000 sq. ft. of planting area are permitted outright as an accessory use to any principal use permitted outright. The keeping of small animals, farm animals, domestic fowl and bees is permitted outright in all zones. Development standards for single family zones, urban farms and animals are found in Seattle Municipal Code (SMC) Chapters 23.44 and 23.42 respectively. SMC 23.76.064 includes provisions for the City Council to waive or modify applicable development standards, accessory use requirements, special use requirements or conditional use criteria for City facilities. The Seattle Parks and Recreation Department (PARKS) requests a Council Concept Approval under SMC 23.76.064 to waive or conditional modify five development standards, as follows:

Table A

Development Standard	Requirement	Proposal	Modification
Mechanical equipment for urban farms. SMC 23.42.051.A.1	Mechanical equipment designed for household use.	Mechanical equipment designed for commercial use.	Allow the installation of commercial mechanical equipment to the proposed classroom building.
Total gross floor area for structures on urban farms. SMC 23.42.051.A.7.a	1,000 sq. ft.	15,978 sq. ft.	Allow total gross floor area for structures on the urban farm to exceed 1,000 sq. ft.
Urban farm structure height. SMC 23.42.051.A.7.b.	12' height limit	Classroom Bldg.: 21' Greenhouse #2: 13'-5" Compost Shed: 12'-10" Wash & Pack Bldg.: 19'-2"	Allow four urban farm structures to exceed the 12' height limit.
Parking aisle maneuvering SMC 23.54.030.E.3	Vehicular turning and maneuvering areas shall be located onsite.	Vehicular maneuvering proposed in the right-of-way (Park Drive South).	Allow vehicular parking maneuvering to occur within the Park Drive South right-of-way.
Maximum urban farm planting area. SMC 23.44.042.B	4,000 sq. ft. of planting area allowed outright for urban farm use.	29,986 sq. ft. of planting area.	Allow urban farm planting area to exceed 4,000 sq. ft. maximum.

SMC 23.76.050 requires the DPD Director to prepare a written report on the Type V application, which includes the following analysis and information discussed below.

1. *The written recommendations or comments of any affected City departments and other governmental agencies having an interest in the application or request;*

Seattle Parks and Recreation Department – Seattle Parks and Recreation (PARKS) published a DNS on November 28, 2012, which analyzed the probable impacts of the proposal and determined that none of the impacts were significant or warranted additional mitigation.

PARKS issued a “self-performed” ECA exemption for planned work within the ECA areas of the Rainier Beach Urban Farm and Wetlands according to SMC 25.09.045.A.3.b. This written document, which is included in the project file, acknowledges that PARKS will “*comply with all applicable provisions of the SMC, make all determinations required, including conditions and shall maintain records documenting compliance with all provisions.*”

City of Seattle Preliminary Assessment Report (PAR) - The MUP application was reviewed through the preliminary assessment process by the following city departments: Department of Planning and Development (DPD) (Site Team, Drainage and Land Use), Seattle Department of Transportation (SDOT), Seattle City Light (SCL), and Seattle Public Utilities (SPU). This process is intended to give applicants an early, preliminary review of issues which may affect their project.

The **DPD** comments for this project include the following:

- The Park Drive South right-of-way is currently unimproved. Per 23.53.015.D.2.b.2, this street shall be paved to a width of 20' from the subject lot to the nearest hard-surfaced street, or 100', whichever is less. The proposal must comply with this requirement or be allowed to remain unimproved by means of a street improvement exception pursuant to 23.53.

DPD reviewed PARKS' right-of-way improvement exception request to exempt all street improvements requirements on Park Drive South. Upon further analysis of PARKS' written analysis, public input and in consultation with SDOT, DPD granted to PARKS an exception to the 20' pavement requirement for Park Drive South.

Department of Planning and Development - The DPD shoreline exemption reviewer determined that no formal shoreline exemption is required because the applicant's materials demonstrated that the proposed improvements will be located on dry land outside of the mapped shoreline environments.

As previously mentioned in this report, DPD supported the ECA wetland exemption analysis prepared and approved by PARKS as permitted per SMC 25.09.045.

Seattle Design Commission – This proposal was not formally presented to the Seattle Design Commission. PARKS explains that, when this project originated, a determination was by the Parks' Director and Design Commission Director to not include this proposal on the Design Commission review list. Written correspondence pertaining to this topic is included in the applicant's project file.

2. Responses to written comments from the public;

PARKS conducted public outreach and meetings for the project prior to submitting the application to DPD. From those public meetings, PARKS maintains their own email and mailing lists as well as public comments, all which informed the project prior to submittal to DPD. PARKS public outreach and meeting efforts are detailed online (http://www.seattle.gov/parks/projects/atlantic_city/nursery.htm).

The required public comment period for this project initially began on April 11, 2013. DPD renoticed the application twice which caused the comment period to end on May 22, 2013. DPD received several written comments regarding this proposal during and after the public comment period. The majority of the comments are summarized below.

PUBLIC COMMENTS	
1.	<i>Please notify me when Parks has applied for an exception to the opening and paving of Park Drive South. I am opposed to this opening and paving.</i>
2.	<p><i>I am a property owner on Pritchard Island. I would like to express my support of the Farm and Wetlands programs proposed for the repurposing of the Atlantic Street Nursery. They provide important services in our community that I like such as:</i></p> <ul style="list-style-type: none"> <i>• Youth training programs like Ground Up Organics</i> <i>• Education through connection with local schools including Rainier Beach High School and South Shore K-8</i> <i>• Senior services through the East African Elders Program</i> <i>• Healthy and nutritious locally grown food for the community through the Rainier Valley Food Bank, Community Kitchens and other distribution programs</i> <p><i>The proposed changes are in harmony with/appropriate in relation to the Parks Department's historic use of the site. Please make sure to work with us to repurpose the site.</i></p>
3.	<p><i>I support the development of the urban farm at Rainier Beach. It is a good way to use the surplus piece of Parks property. It is a good idea to test this relatively new idea, and to make available the experience to other communities considering doing an urban farm. Also I looked at the site design layout and saw that an apiary is to be included. I think it is a capital idea to raise apes. I understand that they are an endangered species. And I think it would be a fine educational program for the students at the local elementary school.</i></p>
4.	<p><i>I am a supporter of the Rainier Beach Urban Farm and Wetlands. I am also a resident of the Pritchard Beach, Island Dr. S. neighborhood and I have the following concerns for your consideration:</i></p> <ul style="list-style-type: none"> <i>• I understand that community event parking for the Rainier Beach Urban Farm and Wetlands will use public parking at Beer Sheva and Pritchard Beach. That is a reasonable plan. However, PLEASE DO NOT allow parking on Island Drive South. We already have tight parking along Island Dr. S. and it causes problems for the residents along this street, even with restrictions and monitors.</i> <i>• Also, if street parking is allowed along S. Cloverdale, please limit it to one side of that street. During previous events at the Farm, when parking was allowed on both sides of that street, we experienced possible head-on collisions and difficulty with ingress/egress to Island Dr. S. There is also the worry about emergency vehicles being able to get to Island Dr. S. residences if parking is allowed on both sides of S. Cloverdale.</i> <i>• I have heard that the Park Department is considering paving and opening up Park Dr. S. for public parking. I have lived on Island Dr. for almost 30 years on the north end. When we first moved here, we had continual problems with people parking on that street and at the end of our street until they were closed. We had drug and prostitute activity nightly, burglaries and loud parties from people deciding it was a good area to park. You will bring back those problems to our neighborhood if that occurs. Our neighborhood has been safer and quieter since these areas have been kept closed to parking.</i>
5.	<p><i>I recently learned that the City of Seattle is considering adding additional off-site parking or revisions to Park Ave. at S. Cloverdale St. and the empty lot and intersection at Island Dr. S. near Rainier Beach Urban Farm & Wetland (RBUFW). I would like to make clear that I am a supporter of the RBUFW and the hard work and progress they've made there. The project seems to be going well and becoming an asset to the local community and City of Seattle. I have been following the development of this project and pay close attention to any mailings or updates released by the city. I have not seen anything regarding this subject in these mailings. That said, I am strongly opposed to expanded off-site parking or any changes to Park Ave. or either intersection.</i></p> <p><i>I am a lifetime resident of the greater Seattle area and a 6 1/2 year resident of Island Drive. My home is directly across the street from the small empty lot at the northern intersection of Park Ave and Island Dr. S. Park Ave has been a road on paper only for the 90 years that it has been in existence. In reality, it is an unpaved footpath. For the first 3 years I lived on Island Drive Park Ave and this intersection was open and accessible from both ends. Approx. 3 years ago large rocks were placed there by the city and local residents with the intention to limit access and eliminate through traffic. Prior to the closing of that road it was frequent site of late night cars "parking". A normal part of my weekend was walking through this empty lot and picking up liquor bottles, condom wrappers, trash, drug paraphernalia and the occasional used syringe. Accessible, hidden parking spots attract this activity in Rainier Beach. This activity and all of the related issues have virtually been eliminated for the 3 years that this intersection has been closed.</i></p> <p><i>I am strongly opposed to any action that would make any changes to the current configuration of Park Ave</i></p>

	<p><i>and either intersection. Any change that would leave this street or intersections open to these undesirable "overnight" visitors.</i></p> <p><i>Any need for additional parking seems to be limited to 10-20 dates per year. There are currently large public parking lots in the immediate area: Rainier Beach High School, Beer Sheva Park and Pritchard Beach Park. There is also significant public parking available on the streets surrounding this neighborhood. Any parking needs on these busy dates that can't be accommodated by these existing lots needs to be handled by RBUFW on site. They have over 5 acres that could be temporarily or permanently configured to handle this parking on these busy days. Expanded offsite parking is essentially asking the surrounding neighborhood to make permanent concessions to their safety and well-being. The RBUFW was opened with the promise to the surrounding neighborhood that it would be a community asset. Please help to keep this promise.</i></p>
6.	<p><i>In reference to the Rainier Beach Urban Farm and Wetlands, I am very pleased with it and the care they are taking of it. Nice to see that property put to good use. The parking seems to be a big problem. I think Behr Sheva and Pritchard Beach would be best. Parking on South Cloverdale can be a problem at times. Large events make it hard for homeowners to access Island Drive South. Emergency vehicles would have loose precious time. I do not think any of us want Park Drive South opened and paved. It is currently a limited alleyway with some steep slopes and large, old trees. I definitely do not want it opened. When it was opened, all of us neighbors who are the most affected, had to cope with the problems of theft, prostitutes, partying, and other unsavory things. I do not think any of us want a repeat of any of that. I sure do not. So, please consider us, and do not open Park Drive South.</i></p>
7.	<p><i>The SDOT requirement that Park Drive S. become a hard surfaced roadway at least 18 feet wide is contained in the Project #3014619 application. The 13 properties that will be affected by this proposal all front on Island Drive S. I do not understand the purpose of opening up Park Drive S. or why it is even considered. It will be so costly because of the uneven terrain, and the embankment would need additional reinforcement. That would add considerable expense.</i></p> <p><i>This project would have a definite impact on the existing pristine area known as the Wetlands adjacent to the Seattle Parks Nursery property. For many years this land has been protected for the migration of flocks of birds and animals. If a change in this area were to occur, no doubt it would be harmful to this preserved area. In addition, Pritchard Island is considered a high crime area. To open up Park Drive S. and make this an easier escape route off the Island for criminals is not a good idea for all of us that permanently live here. As a resident of Island Drive S. for many years, I would appreciate that you reject this part of the petition.</i></p>
8.	<p><i>I live on Island Drive South on Pritchard Island near the Tilth Urban Farm which is applying for a Master Use Permit. As one of the neighbors directly impacted by the Farm I am concerned about a number of the proposed changes. While I am supportive of much of the work of the Urban Farm, I feel that there needs to be attention paid to the small island eco-system and neighborhood that is being impacted by the on-going development.</i></p> <p><i>One issue is the proposed paving of Park Drive South, which has been an unused alleyway for the island's history. To pave it and potentially bring traffic through there would be extremely disruptive to the community and environmentally unsound since it would disrupt the historical environment and wildlife eco-systems there. Another issue is the potential street parking for large events at the farm. While the community and neighborhood has adapted to some of the smaller events, when large events happen it disrupts the neighborhood traffic and walkability as well as bringing large numbers of vehicles into a very small community and island environment where there is basically only one way in and one way out. There should be a limit on the size of events held there with respect to the small neighborhood streets, the limited parking, and the ecology of the wetland and island environment. Additionally, the hedgerow and greenery along S Cloverdale Street have never been a problem area and the dense shrubbery provides a wildlife habitat for birds, helps with noise abatement and carbon sequestration, and is nice to look at.</i></p> <p><i>I know many in the community share my concerns and I trust these will be seriously considered before any further changes are made.</i></p>
9.	<p><i><u>Position:</u> I am writing in opposition to the current plan and proposing an alternative plan. My concerns about the proposal are environmental, protection of critical habitat, safety and welfare. I understand the Park Department could request to waive the requirement of this road for this project. If that is a possibility, I would urge consideration of that solution. If not, I am offering a better option for your consideration.</i></p> <p><i><u>Concerns:</u> The proposed road would destroy a carefully developed ecosystem that was established several years ago through the addition of wetlands on the property. I have watched in wonder as wildlife has moved into this urban zone with the addition of wetlands at the south tip of Island Drive. The proposal under question would pave over this environmentally critical wetland, displacing beavers, eagles, osprey and other wildlife that have returned into the heart of the City. Isn't this destruction antithetical to protecting the habitat of these species? Isn't protection of these species the purpose for the establishment of the wetlands in the first</i></p>

	<p><i>place? Isn't habitat conservancy a prime objective for city parks? I do not know of any other development project in the City that would be permitted to engage in such flagrantly destructive behavior of wetlands and protected habitat.</i></p> <p><i>The environmental impact of this proposal needs to be reviewed under the same standards that are employed for any other development project. If so, I doubt that it would be given further consideration. It is simply destructive, where it does not need to be. In addition, the proposal causes removal of several old trees. More protected habitat will be lost along with many species of birds.</i></p> <p><i>I am truly baffled why the Seattle Parks Department, our appointed stewards of city land and protectors of our wildlife, would make a proposal to remove and destroy environmentally critical areas. Was an environmental study conducted? One needs to be conducted by an independent assessor.</i></p> <p><i>Further, I would ask if the proposers have submitted a topographical map of the area to be paved? The land is very steep in spots and subject to erosion, as anyone could see who has look at the property. I think a significant portion of the road would require building retaining walls due to the steep grade that exists. This would be costly and are we really able to justify these costs? I personally would like to see some of the potholes or broken sidewalks fixed rather than public funds spent on a new paved road over critical habitat – especially when there is a simpler and less costly option to consider.</i></p> <p><i>This leads me to question of what happens to the fences that separate homes on the west and east side of the property from the urban farm? If these are contemplated to be removed, we have a very serious issue -- the issue of public safety. I attended public hearings on the urban farm, where members of the Seattle Police Department testified they had concerns about opening the area because they were unable to patrol it. Crime is a significant problem in our community. The intersection of Henderson and Seward Park Avenue, which would be opened into the new street in the proposal, leads into a dark and wooded area. The intersection is known to be the worst crime area in the City. Already, there have been police pursuits into the woods. My neighbors have seen people running with police following them. I have witnessed addicts “shooting up” at the entrance to the park and seen a police chase a suspect who ran into the urban farm to hide. My neighbors and I are seriously concerned about the welfare and safety of our neighborhood. How can the Seattle Parks Department proceed in good conscience when the City's own police officers are on the public record about opening up this area?</i></p> <p><i>Parking on Cloverdale --and to a lesser extent on Island Drive -- has been a problem for people who are visiting or working at the urban farm. Congestion and blockages have created problems for residents trying to get down the street to their homes. I think proponents of the road may imagine that the perimeter road would be wide enough to permit parking on one side. Parking along the proposed road would only cause additional congestion and neighborhood disruption.</i></p> <p><i>Alternative Plan: I believe there is a simpler, less destructive, more practical, more feasible, and less costly option to consider than the proposal currently under review. The property on the north end of Cloverdale is currently vacant, partially graveled, and virtually flat. It is separated from Cloverdale by a row of trees. I suggest that this area is paved and turned into parking behind the row of trees that exists on the north perimeter. This would take the cars off the road, which has been the site of several bottlenecks or blockages. In addition there is sufficient space to have a road on the inside perimeter of the property which would enable people working there to move freely among their greenhouses and bedding areas. An internal utility road would make sense for the use of the property. In addition, the grade on the interior portion of the property is much flatter and would be substantially less costly to develop and pave than what has been proposed. In addition, it would preserve as much as possible the safety of the neighborhood by keeping the fence and alleyway that separate it from the park. I hope you will consider my concerns and the revision I have submitted.</i></p>
<p>10.</p>	<p><i>I urge Parks to apply for an exception to the opening and paving of Park Dr S, and for DPD and DOT to approve the exception, for the following reasons:</i></p> <p><i>1) Cost - It is a waste of taxpayer money (Opportunity Fund, city department, or Mayoral discretionary dollars) to build what has to be a very expensive road. Surely, there is another street in SE Seattle more deserving of funds for improved pedestrian or vehicular safety.</i></p> <p><i>2) Loss of large trees in the right-of-way - These large trees are important additions to the neighborhood's tree canopy cover and provide lush habitat for birds.</i></p> <p><i>3) Potential increase in crime - Alleys in this neighborhood, improved or otherwise, have been places for prostitution and quick getaways after break-ins. Through incredible efforts by neighbors and the city (a drug house closure, warning signs, watch groups, and Parks' placement of boulders blocking the north end of Park Dr S), we have finally begun to see a reduction in crime from previous years. Let's keep it that way and not create a new easy path for criminals to strike and flee along an opened Park Dr S.</i></p> <p><i>Please add additional parking places on the project site and suggest a shuttle system from established parking lots - Rainier Beach High School, Pritchard Beach, and Atlantic City Boat Ramp - for large events. Previous</i></p>

	<p><i>large events at the Farm have created traffic jams on Cloverdale, which is the only street homeowners and emergency personnel can use to get to Island Dr S.</i></p> <p><i>Please preserve as much wetland as possible and save space for wildlife.</i></p> <p><i>Please notify me when Parks has addressed #10, "Street Improvements," in the Correction Notice #1 dated May 2, 2013, and when DPD has made a decision about the exception (if applied for by Parks).</i></p>
11.	<p><i>As a homeowner here on Island Drive South, I am absolutely against any improvements to the abandoned road known as Park Drive So. There is already enough crime and drug activity in our neighborhood. The road acts as a buffer zone between the night activity in Beer Sheva Park and our neighborhood. I feel that improved access on this road would equal increased crime here.</i></p>
12.	<p><i>The purpose of this letter is to address the DPD's potential requirement that Park Drive South be paved and made into a through street that has no function.</i></p> <p><i>I am a resident of Pritchard Island and live on the north end of Island Drive South where I am not adjacent to the urban farm. We are a community of approximately 71 residences, in the area defined as Pritchard Island. Today, it is a quiet, residential community, along Island Drive South, which has dead ends both north and south.</i></p> <p><i>This community has rallied together to deal with a number of serious criminal issues over the years. In this small community, we have had a murder, armed robberies, two rapes, a home invasion, numerous burglaries and our families exposed to continuous prostitution activity. There was a significant drug problem (primarily due to a drug house) that has appreciably decreased since the mayor and city attorney seized the house and shut it down.</i></p> <p><i>We coordinated with adjacent block watch communities to work with the mayor, city attorney, SPD, SDOT and the Parks Dept to find solutions to these problems. These efforts have resulted in a major reduction in criminal activities.</i></p> <p><i>SDOT played a large role in our success when they closed off automobile access to the lake at each end of Island Drive South. They also restricted access to Park Drive South, put in a traffic circle, closed off all parking on one side of Cloverdale with no parking signs, put up dead end signs as well as additional signage providing clear directions to Pritchard Park.</i></p> <p><i>By putting through the proposed street, we go backwards, inviting the criminal element back into our community. It has been suggested that it may not be paved, basically; an alley with no lighting. I mentioned all that the SDOT has done but all the organizations, I mention above, have served our community in helping us clean out the criminal activity. It would be a disservice to all of those organizations to undo the progress made.</i></p> <p><i>I strongly encourage the Parks Dept to request a waiver of this road improvement requirement, which serves no purpose.</i></p> <p><i>An alternative would be for the DPD and SDOT to earnestly consider an offset to the development of Park Drive South. I have developed commercial property and am familiar with street improvement requirements levied on development projects. I have had to pay mitigation fees, associated with street improvements as far as 37 blocks away from the site.</i></p> <p><i>I see it as a waste of funds to; not only do unnecessary improvements but to do harm to the neighborhood. I am sure that SDOT has a large number of other seriously needed street improvements where the funds could serve the public in a much more essential manner.</i></p>
13.	<p><i>This is a response to the DPD proposal, #3014619, at 5513 Cloverdale to create Urban Farm. These are observations and requests for the development of the site to date.</i></p> <ol style="list-style-type: none"> <i>1. DPD is reviewing the Urban Farm objective.</i> <i>2. The review period for the proposal can be extended to 6-5-13 if presented in writing. DPD strongly consider this feedback. And make it part of the public record and conversation.</i> <i>3. This site is a former Seattle City Parks Nursery, and sits on Cloverdale Street which is the ONLY access to Island Drive, a residential street that serves the Pritchard Island Community a truly a unique neighborhood in Seattle dating back to the original lower of the Lake Washington in 1916, and this should be taken into additional consideration.</i> <i>4. Pritchard Island has historical Significance predating it as a city neighborhood as well.</i> <i>5. Pritchard Island and Island Drive works as a community and has a Community group which responds to issues of impact. It also has many residents who live here base on its unique character, its sense of neighborhood and history. It also has many homeowners whose emotions and economic investment to the neighborhood is similar and any development which affects its only access could unduly create harm to those investments. It has new neighborhood members, but also members living here 30 to 40 years or</i>

	<p><i>more. These neighbors should be given significant thought and consideration in any development.</i></p> <ol style="list-style-type: none"> 6. <i>We have great community agreement on this topic.</i> 7. <i>Whereas the concept of an “Urban Farm” has a unique ring of modern thinking, very little or no economic or environmental success is represented and no significant truly local participation or benefactor has been proven or demonstrated to date on the site or in many experimental urban farms.</i> 8. <i>Parking on the street has already adversely affected the neighborhood and changed the character of the ONLY street access for Island Drive and the generally and consistently changed how the street feels on urban farm “organization” days.</i> 9. <i>It is our observation that many of the parked cars are NOT local benefactors of the urban Farm but city and regional volunteers coming in for volunteer days.</i> 10. <i>The concept of greenhouses, are nothing of the sort as “green” and are generally un-slightly black mesh or plastic covered frame works which are large ugly, almost urban industrial sight when seen form the street.</i> 11. <i>Any additional paving or creation of hard surfaces seems completely contrary to the restoration and use of green spaces that the “urban farm” suggests.</i> 12. <i>Signage has been hand done randomly posted and does not seem in keeping with City Parks. Or other neighborhood character.</i> 13. <i>We recommend as a consideration to parking and entering that the City consider closing the entrance to the park on Cloverdale and opening the park entrance to Beer Sheva.</i> 14. <i>We feel that hand drawn and handwritten sandwich boards, signage and any other signage that is temporary or permanent follow Seattle Parks review and installations guidelines. And be keeping with that and the neighborhood tone.</i> 15. <i>In early discussions on the park conversations on the maintenance and broadening of the walkways and thinning of green spaces in Pritchard Beach wetland was discussed, to encourage better access and safety but very little of this has taken place.</i> 16. <i>Given the proximity to our neighborhood, Cloverdale representing the ONLY entrance to our residential streets, the long and extensive involvement of our community, we request that City of Seattle consider these observations requests and inform our community and consider us a significant joint stakeholder in the development of the site or any other adjoining project that is tied to the development of this site.</i> 17. <i>We request that no sight barriers be cut without neighborhood review. And we suggest that the use of the word green house for anyone who is not a-tuned to the sight is misleading and should be struck form the conversation since it suggests a different visual perspective than what presents.</i> 18. <i>We urge that any additional parking be accommodated on permeable surface ON SITE, or the city encourage the use of the two already hardscape parking lots that already nearly adjoin the area at Pritchard beach and Beer Sheva Park and are largely under or unused for more than 8 or nine months of the year.</i>
<p>14.</p>	<p><i>As a neighbor near the nursery, we have been involved by attending meetings for the last two years regarding this project. We have lived on Island Drive South for the past 13 years and love our neighborhood. Of course we have been very concerned by the new development and changes to the nursery property. We continue to watch traffic increase and the project grow beyond what was originally proposed. We realize that this project will happen no matter what the neighbors want. Many have given up communicating as they have been very unhappy with the Seattle Parks Department and all officials involved. RESPECT the neighbors that live on Island Drive. <u>Cloverdale Street is the only street to our homes.</u> Traffic is a huge concern. I have almost had two head on collisions with trucks coming out of the nursery in the past year!</i></p> <p><i>RESPECT the wildlife habitat in the nursery and near the water end. This is an environmentally critical area. CLOVERDALE STREET: the neighbors on Island Drive are adamant that the foliage and greenbelt stay (along the drive by Cherry trees). We want the barrier from the street to keep our neighborhood “country residential and green.” We have been told this will not be compromised. However, it sounds like a new entrance/exit is being added....so it will be compromised. We want the greenbelt untouched. We do not want to see the Urban Farm from the street.</i></p> <p><i>TRAFFIC/PARKING: We have watched this nightmare unfold with every event. You must have patrol for all events to control parking and traffic. Signs DO NOT work! Emergency vehicles must be able to get to Island</i></p>

	<p><i>Drive and neighbors must be able to drive onto Cloverdale during events.</i></p> <p><i>SECURTIY/FENCES: We do not want the fence line removed. We want this to enforce security in the area.</i></p>
15.	<p><i>I am writing in support of the Rainier Beach Urban Farm and Wetland project #3014619.</i></p> <p><i>I have lived in Rainier Beach over 50 years and have seen the highs and lows of my community. This proposed project has the opportunity to put Rainier Beach back on top. I live approximately 2 miles from the site. It will be an opportunity for me to bring guests and my family and show them what we have to offer other than a purported reputation for crime.</i></p> <p><i>I urge you to approve the funding for this project.</i></p>
16.	<p><i>I have been a resident of Pritchard Island Community since 1985. I have truly enjoyed the quiet residential environment and minimal traffic flow on the island. Many aspects of the community have been very positive and great for raising a family. I live on the North end of Island Dr. S., and the one negative to our community was the free access to Park Dr. S., which doubled as a destination for prostitution and drug use with the frequent debris that accompanies the practices. Since we have limited access to Park Dr. S. the problem has disappeared, along with the easy egress for burglars. While I support the urban farm concept and have no problem with the use of city property for this activity, the proposed "opening" of any part of Park Dr. S. with at least an 18 foot wide pavement with the opportunity for "additional parking" will be an excellent opportunity for a return of illegal activity, putting my family, our neighbors, their children and property at significantly increased risk. The police do not have the manpower to prevent it. I would hate to see such a wonderful happy community abused due to a regulation, which I am sure could be avoided if one wanted.</i></p> <p><i>Thank you in advance for your consideration of our community and those who have lived and enjoyed our environment.</i></p>

Public Comment Response

PARKS is the City department that has jurisdiction over the proposed urban farm site and DPD, in consultation with SDOT, is responsible for determining street improvement requirements for the public right-of-ways abutting the project site. As previously mentioned above, PARKS was granted a street improvement exception to the 20' pavement requirement for Park Drive South. Therefore, Park Drive South will remain unimproved.

PARKS acknowledges that South Cloverdale Street is the main east-west right-of-way leading into Pritchard Island residential neighborhood. Regarding concerns voiced about South Cloverdale Street, PARKS explains that in 2012 Seattle Tilth and PARKS met with SDOT to address parking on South Cloverdale Street and the manner in which the change in use of the site might impact traffic flow and parking conditions in the neighborhood. PARKS states, "We developed a long term plan of phasing in updates to the current parking on Cloverdale, also taking into account the anticipated new curb cut and farm entrance on the northwest corner of the site. As a first step in this plan, in 2012 SDOT installed a new "no parking" sign near the corners of the traffic circle outside of the site, per updated SDOT protocols around traffic circles, and also per Seattle Tilth's experience that without more signage there were a lot of parking issues around this traffic circle during events. Other parking protocol during events includes volunteers with walking talkies stationed outside the gate, at the bottom of the driveway, and at a visitor check in station. This staffing and the new signage has eliminated all traffic or parking issues during large community events at the site." PARKS' materials indicate that during community events, visitors will be encouraged to utilize surface parking areas at neighboring PARKS properties (Beer Sheva Park and Pritchard Island Beach Park).

A minimal amount of vegetation and one mature tree will be removed along South Cloverdale Street to accommodate the proposed northwest entrance. This vegetation and tree are situated in the right-of-way; therefore, permission to remove this landscaping shall be acquired from SDOT. The existing northeast site entrance will remain. The existing fencing along the park's boundary will remain intact. No new or temporary signage is proposed. The current Parks Rainbow sign will be relocated onsite.

3. *An evaluation of the proposal based on the standards and criteria for the approval sought and consistency with applicable City policies;*

Development standards for single family zones, urban farms and animals are found in Seattle Municipal Code (SMC) Chapters 23.44 and 23.42 respectively. SMC Chapter 23.54 includes standards for vehicular parking aisle maneuvering. Public parks are City facilities permitted outright in SF 5000 zones. Urban farms with up to 4,000 sq. ft. of planting area are permitted outright as an accessory use to any principal use permitted outright. The keeping of small animals, farm animals, domestic fowl and bees is permitted outright in all zones. The project meets all applicable development standards for urban farms with the exception of those described in Table A above. Table A shows the code standard and the PARKS proposal for each of the five requested modifications. The requested development standard modifications are discussed below:

Mechanical Equipment

The Land Use Code requires that mechanical equipment for urban farms be designed for household use. The proposal includes the installation of commercial mechanical equipment to the rooftop of the proposed classroom building. This mechanical equipment (kitchen make-up air unit and exhaust fan) is associated with the commercial kitchen area of the structure. Its purpose is to be utilized as a community kitchen in support of educational programs and community events. The equipment would be installed on the structure's rooftop, approximately 30' from the easternmost property line and approximately 90' to the closest residential property's boundary line east of the site.

According to information provided by PARKS, "the commercial mechanical equipment is part of the commercial kitchen equipment that is being salvaged from the University of Washington and is well suited for the capacity of users on the farm. To bring this equipment up to code we are supplying a fire suppression hood." In support of the request to install commercial mechanical equipment, PARKS provided mechanical plans for reference only. These drawings are included in the Master Use Plan's (MUP) set.

The Land Use Code has been developed in accordance with Comprehensive Plan policies. The development standard to address odor is a requirement that relates to Policy LU46. Policy LU46 states, "*Regulate uses and activities that have operations that generate air emissions such as dust, smoke, solvent fumes or odors, in order to maintain and encourage successful commercial and industrial activities while protecting employees, clients, nearby residents, the general public and the natural environment from the impacts that odors and airborne pollutants may cause.*"

The Land Use Code states that potential impacts related to the operation of mechanical equipment, including odor must be considered. Pursuant to 23.42.051.B, DPD is directed to consider potential impacts related to odor-generating equipment and practices. No specific code section pertaining exclusively to odor standards is offered in the Single Family (Chapter 23.44)

section of the Land Use Code. However, code direction is offered concerning odor impacts associated with community centers (institutions) in single family zones. SMC 23.44.022.H states, “*For the purpose of reducing potential noise and odor impacts, the Director shall consider the location on the lot of the proposed institution, on-site parking, outdoor recreational areas, trash and refuse storage areas, ventilating mechanisms, sports facilities and other noise-generating and odor-generating equipment, fixtures or facilities. The institution shall be designed and operated in compliance with the Noise Ordinance, Chapter 25.08. In order to mitigate identified noise and/or odor impacts, the Director may require measures such as landscaping, sound barriers or fences, mounding or berming, adjustments to yard or parking development standards, design modifications, setting hours of operation for facilities or other similar measures.*”

DPD has reviewed the applicant’s plans and supporting materials for the purpose of identifying and analyzing potential odor impacts associated with the installation of commercial mechanical equipment. As noted above, the submitted drawings indicate the proposed classroom building will be sited approximately 80’ away from the closest residential property’s boundary line east of the site. Additionally, PARKS doesn’t indicate that the usage of this kitchen will be for major odor-emitting food processing (cooking of grains, smoking of food, fish processing, coffee roasting, deep fat frying).

The placement of the proposed mechanical equipment is at an appropriate distance away from residential property. It is expected that any odor associated with the preparation of PARKS agriculture will be minimal and dissipate at this distance. DPD recommends approval of this requested modification to development standards to allow the installation of commercial mechanical equipment to the proposed classroom building.

Urban Farm Structure Floor Area

As previously mentioned, this proposal includes the construction of four new one-story structures (classroom building, covered compost structure, farm stand, farm processing storage building), and alterations to six existing one-story structures (five greenhouses, tool shed building). The total gross floor of all of the structures equates to approximately 15,978 sq. ft. This gross floor area square footage exceeds the total gross floor area allowed for all structures intended for urban farm use (1,000 sq. ft.).

The Land Use Code doesn’t offer specific requirements regarding gross floor area limitations for structures on single family zoned property. Comprehensive Plan Policy LU14 offers direction concerning public facilities. It states: “In recognition of the positive contribution many institutions and public facilities have made to the areas in which they are located, respecting community needs and providing necessary services, allow small institutions and public facilities that are determined to be compatible with the function, character and scale of the area in which they are located.”

PARKS explains that the proposed development is a City of Seattle Park being transformed from a surplus nursery site into a long-term working urban farm and demonstration wetlands restoration site. According to PARKS, the intent of this urban farm is “to produce fresh health food annually for families struggling with food security, provide educational opportunities for at-risk and under-served youth in the community, offer access to and education from a rare in-city natural wetlands environment, improve wetland habitat for native wildlife, foster much needed economic development and strengthen community.”

The MUP plans illustrate the relocation of existing structures and placement of proposed structures. These one-story structures sited on the 5.9 acre (258,405 sq. ft.) project site will be respectful of the surrounding residential properties to the east and west and allow for the preservation of the identified wetlands and wetland buffer areas. PARKS has explained that the proposed structures are related to the urban farm use and pertinent to the success and sustainability of the long-term urban farm operation. This proposal is a benefit to the community and the public at-large and is not inconsistent with the applicable Comprehensive Plan policies for city facilities.

DPD recommends approval of the requested modification to development standards to allow the total gross floor area for the proposed structures in urban farm use on the urban farm to exceed

Urban Farm Structure Height

The Land Use Code requires structures for urban farm use to not exceed 12’ in height, including any pitched roof. The Parks department is requesting a modification to development standards to allow the following structures to be constructed or allowed taller than the maximum urban farm structure height limit:

- Proposed Classroom Building: 21’
- Existing Greenhouse #2: 13’-5”
- Proposed Covered Compost Shed: 12’-10”
- Proposed Wash & Pack Building.: 19-2”

The project site is zoned SF 5000 and is considered a public facility (park). The Land Use Code states that the maximum permitted height for any structure with a pitched roof and not located in a required yard is 35’ (SMC 23.44.012). No specific height limits are noted for uses accessory to parks and playgrounds in single family zones per 23.44.060. As noted above, structures utilized for urban farm use are limited to an overall height of 12’.

The Land Use Code has been developed in accordance with Comprehensive Plan policies. Regarding development standards for public facilities, Comprehensive Plan policy LU15 states: “Development standards for small institutions and public facilities affecting building height, bulk, setbacks, open space, landscaping, and screening shall be similar to those required of other development, but should be allowed to vary somewhat because of the special structural requirements of some institutional and public facility uses. Establish criteria limiting variation, in order to achieve design compatibility with the scale and character of the surrounding area. Except for public schools and spires on religious institutions, do not permit small institutions or public facilities to vary from zoned height limits.” Concerning height, Comprehensive Plan policy LU70 states: “Establish height limitations in single-family residential areas that establish predictable maximum heights, maintain a consistent height limit throughout the building envelope, maintain the scale relationship between a structure and its site, address varying topographic conditions, control view blockage and encourage pitched roofs.”

None of the aforementioned structures are situated in required yards (front, rear and sides) on the site. Greenhouse #2 is an existing structure that will remain in place. The submitted MUP plans illustrate the classroom building and wash/pack building having foundations and upper portions of each structure inset into existing sloping topography. These structures are located approximately 80' to the residential properties' nearest boundary lines to the east. The compost shed is centrally located on the project site and setback approximately 70' to the closest residential property boundary line to the west. PARKS's materials did not include special structural documentation justifying height requirements for the proposed structures.

According to PARKS, "The site sits lower than the adjacent street and residences which removes it from a person's horizontal site line. S. Cloverdale St. is heavily vegetated with views into the site only from the driveway entries. The east and west sides which are adjacent to residences have heavily vegetated buffers. The south side is wetland and undeveloped."

The height limitation of 12' is appropriate for urban farm structures accessory to a residential use. Conversely, the height limitation of 35' (meeting the pitched roof requirements) is appropriate for most structures in single family zones and is most consistent with the Comprehensive Plan when applied to public facility uses found in single family zones that achieve design compatibility with the scale and character of the surrounding area.

PARKS request to allow four urban farm structures whose height limit exceeds the 12' maximum height allowed for urban farm structures is suitable in this instance. The tallest structure's proposed height (21' classroom building) is less than the 35' maximum height allowed for most structures in single family zones. The site topography; the distance of the five structures to the residential properties east and west of the park site; and the heavily vegetated buffers abutting the site's east, west and north property lines will assist in obscuring views onto the site and mitigating the potential effects of taller structures constructed on the PARKS property. This request is consistent with the applicable Land Use Code and Comprehensive Plan policies.

DPD recommends approval of the requested modification to development standards to allow the aforementioned four urban farm structures to exceed the 12' height limit.

Parking Aisle Maneuvering

Vehicular access to an informal parking area situated west of the existing tool shed building on the project site is via an existing curb cut located at the site's northeast corner and at the intersection of South Cloverdale Street and Park Drive South. The PARKS proposal includes a conversion of the informal parking area to planting area and the creation of a new parking area configured to provide thirteen of the total fifteen parking spaces to be situated within close proximity to the site's existing vehicular entrance. Vehicular turning and maneuvering in and out of a portion of the proposed parking stalls will occur both onsite and within the right-of-way. The Land Use Code requires all vehicular turning and maneuvering to be located onsite. PARKS is requesting a modification to the development standards to allow vehicular parking maneuvering to occur within the Park Drive South right-of-way.

According to PARKS, the intent is to protect and maintain the existing curb cut as it stands and place surfacing new driveway surfacing in nearly the same alignment as existing. Existing grade variations and vegetation makes the current location the most feasible.

Comprehensive Plan Policy LU19 states: “Allow modifications to standards for required off-street parking, based on the anticipated use of the facility, size of meeting or assembly areas, hours of use, anticipated effects of parking on the surrounding community, information contained in the transportation plan, access to public transportation and carpools, and other considerations of need and impact.” Additionally, Comprehensive Plan Policy LU53.1 states: “When designing parking facilities in City parks, strive to preserve parks open space, green space, trees and other mature vegetation; limit parking to discourage auto use and discourage the conversion of surface area to parking for private automobiles.”

PARKS proposes the creation of an urban farm on PARKS’s property to be operated in partnership with a non-profit organization. This facility will be open to the public. The proposed onsite parking area is accessory to the urban farm use, as well as, visitors to the neighboring PARKS’s properties. PARKS has sited the parking area to align with the existing curb cut/drive way configuration and minimize impacts associated with planned planting areas, existing ECA wetland areas, proposed wetland restoration areas and required improvements to Park Drive South. PARKS has considered public comment in support of not improving this right-of-way. Allowing parking and maneuvering to occur within this same right-of-way area would be less impactful. Additionally, PARKS has not reported any safety issues.

DPD recommends approval of the requested modification to development standards to allow vehicular parking maneuvering to occur within the Park Drive South right-of-way.

Maximum Urban Farm Planting Area

The Land Use Code states that the maximum quantity of urban farm planting area permitted outright is 4,000 sq. ft. The PARKS proposal includes 29,986 sq. ft. of planting area: 18,845 sq. ft. improved planting fields and 11,141.25 sq. ft. allotted towards enclosed planting areas (five greenhouse structures). The proposal also includes landscaping, wetland restoration areas and rain gardens which are excluded from the overall planting area being proposed.

In regards to urban design, Comprehensive Plan policy UD10 states: “Design landscaping strategies that can contribute to urban food production.” Similarly, Comprehensive Plan policy UV57.5 states: “Create opportunities for people to experience the natural environment by including parks, forested areas, urban agriculture (P-Patches, farms, orchards and community gardens), and viewpoints among the priority uses to be considered for the City’s surplus properties.”

As previously noted in this report, one of PARKS’s goals for the conversion of the PARK’s former plant nursery to an urban farm is, “*to produce fresh health food annually for families struggling with food security, provide educational opportunities for at-risk and under-served youth in the community, offer access to an education from a rare in-city natural wetlands environment, improve wetland habitat for native wildlife, foster much needed economic development and strengthen community.*” PARKS explains that the proposed planting areas are intended, “to engage 5,000 community members and produce more than 20,000 pounds of fresh fruits and vegetables annually and to utilize the site to a reasonable potential to the lot size.”

Generally, the code-required planting area limitation of 4,000 sq. ft. is appropriate for most privately-owned properties in single family zones. However, as previously explained, the project site is a public facility (park). PARKS requests to design an urban farm at the scale of a city park that allows the opportunity to contribute urban food production on a large scale to meet the needs of the community. DPD concurs that PARKS's request to allow 29,986 sq. ft. of planting area is reasonable and is consistent with the applicable Comprehensive Plan policies.

DPD recommends approval of the requested modification to development standards to allow the urban farm planting area to exceed 4,000 sq. ft. maximum.

4. All environmental documentation, including any checklist, EIS or DNS; and

DPD's recommendation on the five requested modifications to development standards for the existing City facility, SEPA conditional analysis and recommendation; PARKS's issued SEPA DNS and SEPA checklist, November 28, 2012; PARKS topographic land survey; Wetland delineation report prepared by SPU, April 2010; Hazardous materials survey; PARKS's ECA exemption; City Council approved agreement (Ordinance #123967) and attachments; public comments; and the Master Use Permit plans are part of this report and will be transmitted to Council.

5. The Director's recommendations to approve, approve with conditions, or deny a proposal.

Based on the analysis provided above, DPD recommends the following:

- A. DPD recommends **approval** of the requested modification to development standards to allow the installation of commercial mechanical equipment to the proposed classroom building.
- B. DPD recommends **approval** of the requested modification to development standards to allow the total gross floor area for structures on the urban farm to exceed 1,000 sq. ft. (15,978 sq. ft. proposed)
- C. DPD recommends **approval** of the requested modification to development standards to allow four urban farm structures to exceed the 12' height limit. (21' maximum height proposed)
- D. DPD recommends **approval** of the requested modification to development standards to allow vehicular parking maneuvering to occur within the Park Drive South right-of-way.
- E. DPD recommends **approval** of the requested modification to development standards to allow the urban farm planting area to exceed 4,000 sq. ft. maximum. (29,986 sq. ft. proposed)

ANALYSIS - SEPA

On November 28, 2012, Seattle Parks and Recreation published a Determination of Non-Significance for the Rainier Beach Urban Farm proposal. Project specific environmental impacts of the improvements have been disclosed and analyzed in the documents provided by Seattle Parks and Recreation, acting as Lead Agency.

The Seattle SEPA Ordinance provides substantive authority to require mitigation of adverse environmental impacts resulting from a proposed project (SMC 25.05.655 and 25.05.660). Mitigation, when required, must be related to specific environmental impacts identified in an environmental document and may only be imposed to the extent that a given impact is attributable to a proposal, and to the extent that the mitigation is reasonable and capable of being accomplished. Additionally, mitigation may be imposed only when based on policies, plans and regulations referenced in SMC 25.05.665 to SMC 25.05.675 inclusive (SEPA Overview Policy, SEPA Cumulative Impacts Policy, and SEPA Specific Environmental Policies). In some instances, local, state or federal regulatory requirements will provide sufficient mitigation of an impact and additional mitigation imposed through SEPA may not be necessary.

Codes and development regulations applicable to this proposed project will provide sufficient mitigation for short and/or long term impacts. Applicable codes may include the Stormwater Code (SMC 22.800-808), the Grading Code (SMC 22.170), the Street Use Ordinance (SMC Title 15), the Seattle Building Code, Environmentally Critical Areas Ordinance and the Noise Control Ordinance (SMC 25.08). Puget Sound Clean Air Agency regulations require control of fugitive dust to protect air quality.

Short - term Impacts

The following temporary construction-related impacts are expected and were described in the DNS: hydrocarbon emissions from construction vehicles and equipment, increased dust caused by construction activities, potential soil erosion and disturbance to subsurface soils during site work, increase traffic from construction and personnel, increased noise, and consumption of renewable and non-renewable resources. Compliance with the applicable codes and ordinances will reduce or eliminate most adverse short-term impacts to the environment. However, due to the proximity of the site to other recreational and residential uses, further discussion of short-term construction related impacts follows.

Noise

The project site abuts improved and unimproved non-arterial streets (South Cloverdale Street and Park Drive South). Residential properties are situated across the abovementioned streets and abut the site's west boundary line. PARKS property (Pritchard Island Beach Park and Beer Sheva Park) is situated north and southwest of the project site. All surrounding properties are located in the same zone as the project site. No significant noise sources are identified.

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.); dismantling of the existing structures; 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.

The Noise Ordinance states construction activities within 50' of occupied single family zones shall be limited to non-holiday weekdays from 7:00 a.m. – 10:00 p.m. and 9:00 a.m. – 10:00 p.m. on weekends and legal holidays. Impact construction work (pile driving, jackhammers, vactor trucks, etc.) is further limited (8:00 a.m. – 5:00 p.m. on weekdays and 9:00 a.m. – 5:00 p.m. weekends and legal holidays).

To mitigate noise impacts resulting from the dismantling of the existing greenhouse structures, construction of the proposed structures and site work, the SEPA checklist notes the following mitigating elements of the proposal:

- Standard construction noise will occur between 7:00 a.m. and 6:00 p.m. Construction will be accomplished in compliance with the City of Seattle Noise Ordinance and will not impact local noise.

PARKS commits to limiting construction activity well within the codified construction timeframes. It is the Department's conclusion that limiting hours of construction beyond the requirements of the Noise Ordinance is not justified for this project on this specific site. No further conditioning or mitigation is warranted.

Construction-Related Grading and Traffic

Grading and related construction traffic is listed as short-term potential impacts. The maximum amount of grading proposed will consist of 2,989 cu. yds. of material. Some of the soil removed will not be reused on the site and will need to be disposed off-site by trucks.

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). Any temporary closure of the sidewalk and/or traffic lane(s) is adequately controlled with a street use permit through SDOT. Existing City code (SMC 11.62) requires truck activities to use arterial streets to every extent possible. City code (SMC 11.74) provides that material hauled in trucks not be spilled during transport. The City requires that a minimum of one foot of "freeboard" (area from level of material to the top of the truck container) be provided in loaded uncovered trucks which minimize the amount of spilled material and dust from the truck bed en-route to or from a site.

To mitigate erosion and construction traffic resulting from grading activities associated with the construction activities and site work, the SEPA checklist notes the following mitigating element of the proposal:

- The contractor will be required to utilize Standard City of Seattle Best Management Practices (BMPs) and prepare a Construction Stormwater Pollution Prevention Plan which will be reviewed by the City prior to the start of construction. Implementation of these plans and practices will control possible erosion and sedimentation. Some of the BMPs are as follows:
 - Install silt fencing downslope of work areas to prevent sediment in stormwater from leaving the site.
 - Cover material stockpiles when not in use.

- Stabilize construction staging and entry areas with crushed gravel or similar material. Wash vehicle tires before leaving the site to prevent mud from being carried onto the street.
- Construct runoff collection and conveyance facilities to process sediment laden stormwater on-site to reduce suspended solids from leaving the site. Regularly inspect or clean retention facilities so ensure they don't fill up with sediment.
- The site is adjacent to Seward Park Avenue South, which provides direct access to Rainier Avenue South, a City arterial. The surrounding arterial provides convenient truck access. Given the surrounding traffic volumes (18,000 Average Annual Daily Traffic-AADT), the additional construction truck trips are not considered significant. Construction traffic and haul route(s) will be designated, and notices and signage will alert pedestrians and drivers to times of day and peak activities.

The submitted MUP plans included temporary erosion and sediment control (TESC) civil drawings which received preliminary review by the DPD Drainage Reviewer who has deemed this information adequate for this proposal. The TESC drawings, grading plans, drainage control plans and construction plans will be reviewed again by the DPD Drainage Reviewer and Building Plans Examiner who will require any additional information as necessary to assure safe grading and excavation proceed without undue risk to the property or to adjacent properties.

DPD concurs that PARKS's measures to minimize temporary construction traffic impacts to the surrounding neighborhood are appropriate.

No further conditioning of the grading and construction traffic elements of the project is warranted pursuant to SEPA policies.

Long – term Impacts

Long-term or use-related impacts anticipated from the proposal include: increased bulk and scale; possible increased traffic demand; increased ambient noise due to human activity and farming; and increased energy consumption. These impacts are not considered adverse.

PARKS's SEPA document identified the existing Environmentally Critical Areas site condition as a potential long-term impact. Therefore, further discussion is warranted.

Environmentally Critical Areas (ECA)

The development site contains the following mapped ECAs: Liquefaction prone soils, Shoreline Habitat and Wetlands.

The DPD shoreline exemption reviewer reviewed the submitted MUP plans and determined that the project is exempt from ECA Shoreline Habitat review due to the proposed improvements being planned on dry land outside of the mapped shoreline environments. Also, based on technical reports and review of PARKS plans, DPD concurred with PARKS's analysis that the proposal will have no negative impact on the wetlands or buffers. Consequently, DPD supported the ECA wetland exemption analysis prepared and approved by PARKS as permitted per SMC 25.09.045. The signed ECA exemption is located in the application information with DPD.

Portions of the site within the area of the former nursery are mapped the following Environmentally Critical Areas (ECAs): The submitted drawings indicate that proposed improvements will be located on dry land outside of the mapped shoreline environments: therefore, the DPD shoreline exemption reviewer determined that no formal shoreline exemption is required. Based on technical reports, DPD concurred with PARKS's analysis that the proposal will have no negative impact on the wetlands or buffers. Consequently, DPD supported the ECA wetland exemption analysis prepared and approved by PARKS as permitted per SMC 25.09.045.

No conditioning or mitigation is warranted pursuant to SEPA earth policies.

RECOMMENDATION – SEPA CONDITIONING SUMMARY

The DNS prepared by PARKS states: “Long term operation, maintenance and enhancement of the site will be provided by Seattle Tilth and the Friends of Rainier Beach Urban Farm and Wetlands. Upon completion of the project, no long term adverse environmental impacts are anticipated and thus no conditioning is necessary or warranted.”

In conclusion, several impacts to the environment would result from the proposed development. However, the conditions are not significantly adverse. Existing codes and development regulations applicable to this proposed project will provide sufficient mitigation and be compliant with SEPA policies.

This analysis was done after review by the responsible official on behalf of the lead agency of the DNS; and other information on file with the responsible department. Pursuant to SMC 25.05.600.D.1, DPD relies on the environmental documents and technical reports prepared by PARKS. DPD has determined that the DNS issued and utilized for the environmental analysis of the Rainier Beach Urban Farm proposal and permitted herein, is adequate. This constitutes DPD's substantive SEPA conditioning and recommendation to City Council.

RECOMMENDED CONDITION(S) – TYPE V COUNCIL LAND USE DECISION

None.

RECOMMENDED CONDITION(S) – SEPA

None.

Signature: _____ (signature on file) Date: August 4, 2014
Tami Garrett, Senior Land Use Planner
Department of Planning and Development

TG:drm

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