



City of Seattle

Gregory J. Nickels, Mayor

Department of Planning and Development

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**CITY OF SEATTLE
DETERMINATION OF NON-SIGNIFICANCE BY
THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

Applicant Name: Jim Holmes for the Department of Planning and Development

Address of Proposal: Various sites along the West Dravus Corridor

SUMMARY OF PROPOSED ACTION

The proposal is to change the zoning on approximately 7.5 acres of land near W. Dravus Street in the Interbay area from C2-40 and C1-40 to SM/D 40-65 and SM/D 40-125.

The following approval is required:

SEPA - Environmental Conditions - Chapter 25.05, Seattle Municipal Code.

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

BACKGROUND DATA

Background

The area affected by the proposed rezone is west of 15th Avenue West, north and south of West Dravus Street. These blocks are zoned C1-40 or C2-40. North of West Dravus Street, properties subject to the proposed amendment are developed with a mix of land uses, including a grocery store, a convenience store, a restaurant, service uses, office uses, and a church. Land adjacent to these parcels is developed with a range of industrial and commercial uses as well as some vacant property. South of West Dravus Street, properties subject to the proposed amendment are developed with office, retail, restaurant, storage, and residential uses. A number of parcels south of West Dravus Street are vacant or unused. Land adjacent to parcels to the south of Dravus includes a city-owned driving range and park as well as a Seattle Pacific University baseball field.

Parcels to the northwest of the proposed rezone are generally zoned IG 2/U 45; parcels to the southwest are zoned C2 40. 15th Avenue West borders the proposed rezone area to the east; parcels on the east side of 15th Avenue West are zoned NC3-40.

Proposal Description

The proposed amendment would change the zoning on approximately 7.5 acres of land from C1-40 and C2-40 to SM/D 40-65 and SM/D 40-125. This zone change would allow for the development of mixed use projects throughout the study area and could introduce residential uses north of W. Dravus Street, where they are generally discouraged by the Land Use Code. The proposed amendment also increases the maximum height limits from 40 feet to as high as 125 feet, thereby increasing developable floor area. It is anticipated that these zone changes will result in development of approximately 1,500 dwelling units and as much as approximately 646,000 square feet of commercial floor area.

The legislation establishing the rezone also would enact the following:

- Creation of affordable housing incentives program that would apply to the SM/D zones: structures in the SM/D zones would be limited to 40' in height, unless (a) the portions of the structures above 40' contain only residential uses, and (b) the applicant provide affordable workforce housing, as specified in the legislation.
- Setbacks along W. Dravus Street: Any structure developing above 40' in height would be required to set back those portions of the structure above 40' in height at least 50' from W. Dravus Street.
- Creation of Local Improvement District to finance transportation improvements: The proposed legislation would not take effect until a Local Improvement District is formed for the purpose of financing specific transportation improvements (see discussion of transportation impacts, below).

Public Comments

Proposed changes to the Land Use Code require City Council approval. Public comment will be taken on the proposed amendments during future Council hearings.

ANALYSIS - SEPA

The initial disclosure of the potential impacts from this project was made in the environmental checklist dated July 16, 2008. The information in the checklist, the Director's Report and Recommendation, a copy of the proposed text changes, and the experience of the lead agency with review of similar legislative actions form the basis for this analysis and decision.

Short-term Impacts

As a non-project action, the proposed amendment will not have any short-term impact on the environment. Future development affected by this legislation and subject to SEPA will be required to address short-term impacts on the environment.

Long-term Impacts

Most long-term impacts of this code amendment are expected to be minor. Impacts to noise, light and glare, energy, air quality (including greenhouse gas emissions), and most public services and facilities may slightly increase, due to larger structures and greater levels of activity on various sites, but are not expected to be substantial. Any expansion of 12,000 square feet or more or the creation of more than 20 dwelling units will be subject to project-level SEPA review, which will allow for more focused review of environmental impacts of individual developments. In addition, projects expanding under the provision of this code amendment will need to comply with existing codes and regulations, including the Land Use Code, Environmentally Critical Areas regulations, and the Stormwater, Grading and Drainage Control Code.

The most likely adverse impacts of the proposed amendment would be to land use; height, bulk, and scale; public view protection; drainage; and traffic and transportation. Various sections of the proposed amendment respond to some of these potential impacts by codifying mitigation. These topics are discussed further below.

Land Use

The Land Use SEPA policy states, in part, that “it is the City’s policy to ensure that proposed uses in development projects are reasonably compatible with surrounding uses and are consistent with any applicable, adopted City land use regulations... (and) the goals and policies set forth in Section B of the land use element of the Seattle Comprehensive Plan regarding Land Use Categories”. In general, the development anticipated pursuant to these code amendments is likely to contain uses consistent with those currently allowed in the existing C1 and C2 zone areas, such as office, light manufacturing, and retail uses. The primary change in anticipated uses is that residential development will be allowed outright north of West Dravus Street. This area currently is zoned C2, in which residential development is a conditional use. In particular, the conditional use criteria for residential development in this zone generally discourage residential development in close proximity to industrial areas; the northwest boundary of this portion of the rezone area abuts industrial-zoned (IG2) land.

This rezone of parcels from C2 to SM/D 40-65 and SM/D 40-125 likely will introduce some incompatibilities, resulting in land use impacts. The precise nature of these impacts cannot be determined absent particular development proposals, and will be influenced, in part, by design and use choices both on the SM/D parcels and on the industrial sites. Site design on the SM/D parcels may be more or less compatible with adjacent land uses on industrial properties, depending on design features such as building heights, setbacks from property lines, and placement of residential windows, porches, and other features.

Residential and commercial projects developing pursuant to these text amendments will participate in the City’s design review process. Design review considers the context and character of surrounding development in applying City design guidelines, thus providing some opportunity to reduce incompatibility between new development proposals and development that may occur on adjacent parcels. It is not anticipated that the proposed text amendments will result in significant land use impacts, pursuant to SMC 25.05.675 J.

Height, Bulk, and Scale

The text amendment would apply to parcels along 15th Avenue West and West Dravus Street. Current height limits in this area are 40'. The proposed text amendments would allow buildings up to 125 feet in the affected area. This would allow taller buildings than those that could be built on immediately adjacent parcels.

Bulk and scale impacts of projects proposed pursuant to this code amendment will be addressed by the City's design review process (for residential and commercial projects). Specific height, bulk and scale impacts of particular projects will be determined at the time of project-specific SEPA review. Such projects will be required to meet new setback requirements for portions of structures above 40' along West Dravus Street, proposed as part of this code amendment package. This requirement will help reduce bulk and scale impacts of individual projects that are adjacent to this street. The text amendments are not expected to have a significant impact on height, bulk, and scale, pursuant to SMC 25.05.675 G.

Public View Protection

The SEPA View Protection Policy specifies public places from which views of significant natural and human-made features are to be protected. In general, the area covered by the proposed text amendments is far enough away from any such viewpoints that no views of significant features are likely to be blocked. The closest such public place is Soundview Terrace Park, on the western side of Queen Anne Hill. Views from Soundview Terrace Park towards the area of the proposed rezone are almost entirely blocked by existing structures; in addition, the elevation of this park (roughly 300') suggests that even the tallest buildings that would be allowed under the rezone would not affect protected views. The new upper-level setback requirement on West Dravus Street would reduce the impacts of new development on east-west views along this street.

The impacts of specific proposals on public view protection would be analyzed at the time of individual project application. The text amendments are not expected to have a significant impact on public views, pursuant to SMC 25.05.675 P.

Drainage

The increase in development capacity allowed by the proposed text amendments would increase impacts on sewer and stormwater flows. A planning level analysis will be made to evaluate the change in stormwater and sanitary sewer flows expected from this legislation into the combined sewer infrastructure. The impacts of individual projects on drainage will be evaluated at the time of permit submittal. Various City regulations, such as the Stormwater, Grading and Drainage Control Code and Side Sewer Permit review, provide authority to require project-level mitigation, including drainage control plans and on-site detention. Impact on drainage also will be evaluated through SEPA review for projects exceeding SEPA thresholds. The text amendments are not expected to result in a significant impact on drainage, pursuant to SMC 25.05.675 C.

Transportation

The proposed text amendments will increase development capacity on various parcels in the affected area, generating higher volumes of traffic and creating transportation impacts. Heffron Transportation, Inc., provided an analysis of the likely impacts of increased development within the rezone area (“Summary of Transportation Analysis,” dated 7/31/07). The analysis concluded that expected development pursuant to the rezone would generate approximately 12,250 daily vehicle trips, with 595 of these occurring in the AM peak hour and 1,125 occurring in the PM peak hour. Without the rezone, these parcels likely would generate approximately 8,030 daily trips, with 190 in the AM peak hour and 740 in the PM peak hour (see following table):

	Daily trips	AM peak hour trips	PM peak hour trips
Trips generated by build-out of existing zoning	8,030	190	740
Trips generated by build-out of proposed rezone	12,250	595	1,125
Net change due to rezone	4,220	405	385

The Heffron report analyzed the impacts of this increased traffic on intersections and roadways in the study area. The results led to recommendations for various capital improvements and modifications, which were coordinated with key staff at the Seattle Department of Transportation. The improvements are described in the Heffron report and are included in the draft legislation, to be enacted by a Local Improvement District prior to the code amendments taking effect.

Two of the key improvements recommended by Heffron and included in the draft legislation are installation of a traffic signal at the W. Dravus Street/17th Avenue W intersection, and upgrading the signal system at the W. Dravus Street/15th Avenue W interchange. The W. Dravus St/17th Ave W intersection currently operates poorly (LOS F) during the PM peak hour; this performance would worsen by the 2030 horizon year used in the Heffron report, with additional traffic generated either by projects developing pursuant to the proposed rezone or by other projects in the general vicinity of the intersection. Signalization of this intersection would result in an LOS C during the PM peak hour.

The northbound ramp at the W Dravus St/15th Ave W interchange also currently operates at LOS F during the PM peak hour, and is expected to further degrade with the addition of either traffic generated by development pursuant to the proposed rezone or by traffic generated by other nearby development. Currently, the signals at the northbound and southbound 15th Ave W ramps at W Dravus Street operate in an “all-flash” mode at peak hours, resulting in all-way stops. Reprogramming and coordinating these signals would result in improved operations. The southbound ramp would improve from LOS D to LOS C in the PM peak hour. The northbound ramp would continue to operate at LOS F in the PM peak hour, but the average delay experienced by each vehicle would decrease by over 40 seconds compared to future conditions with the “all-flash” signal setting, indicating that the reprogramming and coordination of the signals would provide capacity that could accommodate greater traffic volumes than those forecast by Heffron.

In addition to the mitigation described above, the Heffron report recommended the following capital improvements, which have been included in the draft legislation:

- install left turn lanes on 17th Avenue W approaching the W Dravus Street intersection;
- restrict left-turn movements from 16th Avenue W onto W Dravus Street;
- control access to W Dravus Street between 16th Avenue W and 17th Avenue W;
- improve the intersection at the W Bertona St/15th Ave W southbound ramp.

Updated estimates of development capacity by DPD long-range planning staff have increased the amount of additional development expected as a result of the proposed legislation. The additional increment of growth primarily is expected to be commercial office development, rather than residential units or retail square footage, with approximately 488,000 square feet of additional office space projected in the rezone area. This would increase the projected trip generation estimates of the Heffron report as follows:

	Daily trips	AM peak hour trips	PM peak hour trips
Heffron forecast of net change in trips	4,220	405	385
Additional trips with updated capacity estimates	3,190	449	432
Total increased trips due to rezone	7,410	854	817

The traffic associated with the additional increment of growth may be overstated by the above figures, for two reasons:

- The trips have not been reduced to reflect opportunities for internal trips. It is likely that some portion of persons living within the rezone area may also work or shop within the area, or that workers in the area may also shop in the area during lunch or after work. Such internal trips typically would be made on foot, and would reduce the above forecasts by as much as 10-15%.
- Only a slight reduction in trips was assumed due to Transportation Management Program (TMP) efforts, such as employer-subsidized bus passes, rideshare matching, and other trip reduction elements designed to reduce single-occupant auto travel. More substantial TMP programs, instituted at the time of individual project review, likely would result in lower overall trip volumes.

The additional increment of traffic growth was distributed to the roadway system based on the expected distribution of office trips in this area. The additional increment of growth is expected to add approximately 185 PM peak hour trips to the 15th Ave W northbound ramp/W Dravus St interchange. The Heffron study noted that, in 2004, 1,660 PM peak hour vehicles were counted at this interchange. The Heffron forecast of likely traffic to be generated by properties in the rezone area added 408 more vehicles to this leg of the interchange. (This reflects traffic that likely would be generated without the proposed rezone as well as traffic that would occur only with the rezone.) The additional 185 vehicles expected to use this leg of the interchange with full build-out of the rezoned parcels represents a 31% increase in traffic over the Heffron estimate of trips generated by the affected parcels, and is roughly an 8% increase over the total of 2004 counts and the Heffron estimates.

As noted above, the full signalization of the 15th Ave W/W Dravus St interchange will result in a substantial reduction in average delay for vehicles by the year 2030. Under current zoning and

with no change to the “all-flash” operations, average delay at the northbound leg of this intersection will be at least 40 seconds greater than will occur with full signalization and the addition of rezone area traffic forecast by Heffron (408 vehicles). The 185 vehicles forecast from the additional increment of development capacity will increase delay at this leg of the interchange beyond that forecast by Heffron; however, the increase in average delay is likely to be less than 40 seconds. Therefore, the total delay at this interchange is expected to be less than future conditions without the rezone and with the current “all-flash” signal operation.

In summary, the growth in traffic due to the proposed text amendments will have noticeable impacts on intersections and roadways in and adjacent to the study area. These impacts will be effectively mitigated by the recommended capital improvements identified in the Heffron report and included in the draft legislation. With these improvements, no significant adverse transportation impacts are expected due to the proposed text changes, pursuant to SMC 25.05.675 R. The transportation impacts of individual projects developing pursuant to these proposed text changes will be evaluated through SEPA review at the time of permit applications and, if necessary, additional mitigation will be required at that time.

Conclusion

The proposed code amendments to modify zoning on a 7.5 acre area north and south of West Dravus Street are not expected to have substantial adverse impacts. Setbacks required as part of the code amendments will provide mitigation to reduce potential height, bulk and scale and public view impacts. A series of transportation capital improvements will reduce potential traffic impacts on roadways and intersections within and near the rezone area. Land use impacts will be mitigated to some extent by the design review process. Developments over the SEPA threshold will be subject to project-level SEPA review; mitigation based on that review would further reduce impacts from projects developing pursuant to these code amendments. Based on these considerations and on the limited area over which the code amendments will apply, these amendments are expected to have no significant adverse environmental impacts.

DECISION – SEPA

This decision was made after review by the responsible official on behalf of the lead agency of a 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 requirements of the State Environmental Policy Act (RCW 43.21C), including the requirement to inform the public agency decisions pursuant to SEPA.

- [X] 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 2c.
- [] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030 2c.

