City of Seattle

Department of Planning and Development
Diane M. Sugimura, Director

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

SEPA Threshold Determination
for
Greenwood/Phinney Ridge Urban Village Rezones

Project Sponsor: Department of Planning and Development

Location of Proposal: The amendments relate to the central portion of the Greenwood/Phinney Ridge Residential Urban Village (RUV), including areas generally west of an alley between Greenwood Avenue N. and Palatine Avenue N., east of 3rd Avenue NW, north of an alley between NW 84th and 85th Streets, and south of NW 87th Street.

The following approval is required:

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

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

[ ] DNS with conditions

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

BACKGROUND

DPD is issuing this revised environmental determination in response to the City's Hearing Examiner ruling for Hearing Examiner File W-11-003, issued on October 14, 2011. This determination includes additional analysis and conclusions that relate to future potential development enabled by the rezone, including on six topics described by the Examiner:

1. A new development capacity analysis;
2. Information about pending development projects is factored into analysis of development capacity;
3. Revisit traffic analysis: identify and analyze impacts in a quantitative fashion;
4. An analysis of impacts on police and fire services, and other public services;
5. A cumulative impact analysis.

The location of analysis for each topic is marked in the body of this report.

DPD is studying rezones for a 13+ acre portion of the Greenwood/Phinney Ridge RUV that follow from neighborhood recommendations, and the subsequent direction of the City Council to undertake additional outreach to solicit feedback on rezone concepts. Following a June 29, 2010 public open house and an online survey, DPD evaluated public input and refined the geographic extent of the rezone study area and details of the recommended rezones. Preliminary rezone recommendations were posted on a DPD website in November 2010, but additional follow-up analysis in 2011 resulted in refinements to the recommendations.

The study area consists of approximately three blocks of properties in the western portion of the Greenwood district's core, which is the main business district within the RUV. The Greenwood core's primary crossroads is located at Greenwood Avenue N and N 85th Street, just east of the rezone study area. For several decades, the study area has provided for automobile-oriented commercial retail uses in the form of a grocery store, a multipurpose retail store, a retail complex with a few business spaces, and a few other properties mostly located in the first block north of NW 85th Street. As such, the lots' uses primarily consist of 1-2 story commercial-use buildings with parking lots located between the buildings and street edges. Other than the primarily commercial uses along the NW 85th Street and Greenwood Avenue N corridors, surrounding blocks consist primarily of Single Family zoned low-density residential uses, separated from the study area by alleys or streets, which include NW 87th Street and 3rd Avenue NW.

<u>Proposal Description</u>

For analysis purposes, the rezone study area is divided into four subareas that have distinct zone recommendations (see Figures 1-5). The recommendations would primarily change the existing automobile-oriented Commercial 1 zones to Neighborhood Commercial 2 (NC2) and Neighborhood Commercial 3 (NC 3) zones that would better accommodate mixed-use development within this portion of the Greenwood/Phinney RUV (and would include Pedestrian designations applicable to NW 85th Street edges), would add a Pedestrian "P" designation to approximately one block of property that is already zoned NC2 with a 40-foot height limit on the south side of NW 85th Street, and would rezone other properties near N 87th Street from a Lowrise 2 Residential-Commercial (LR2 RC) zone to an NC2 zone that would more clearly reflect a preference for mixed-use development within this portion of the Greenwood RUV. Incentive zoning provisions would also be included, as denoted by numbers in parentheses which would be base density levels (measured in floor area ratio), above which it would be necessary to fulfill incentive zoning requirements in Section 23.58A of the Land Use Code. The zone recommendations are summarized as follows:

Subarea A

1. Rezone parcels between 1st Avenue NW, 3rd Avenue NW, NW 85th Street and NW 87th Street from Commercial 1 (C1 40') to Neighborhood Commercial 3, including portions with and without a Pedestrian "P" designation (NC3 65' (3) and NC3P 65' (3)).

Subarea B

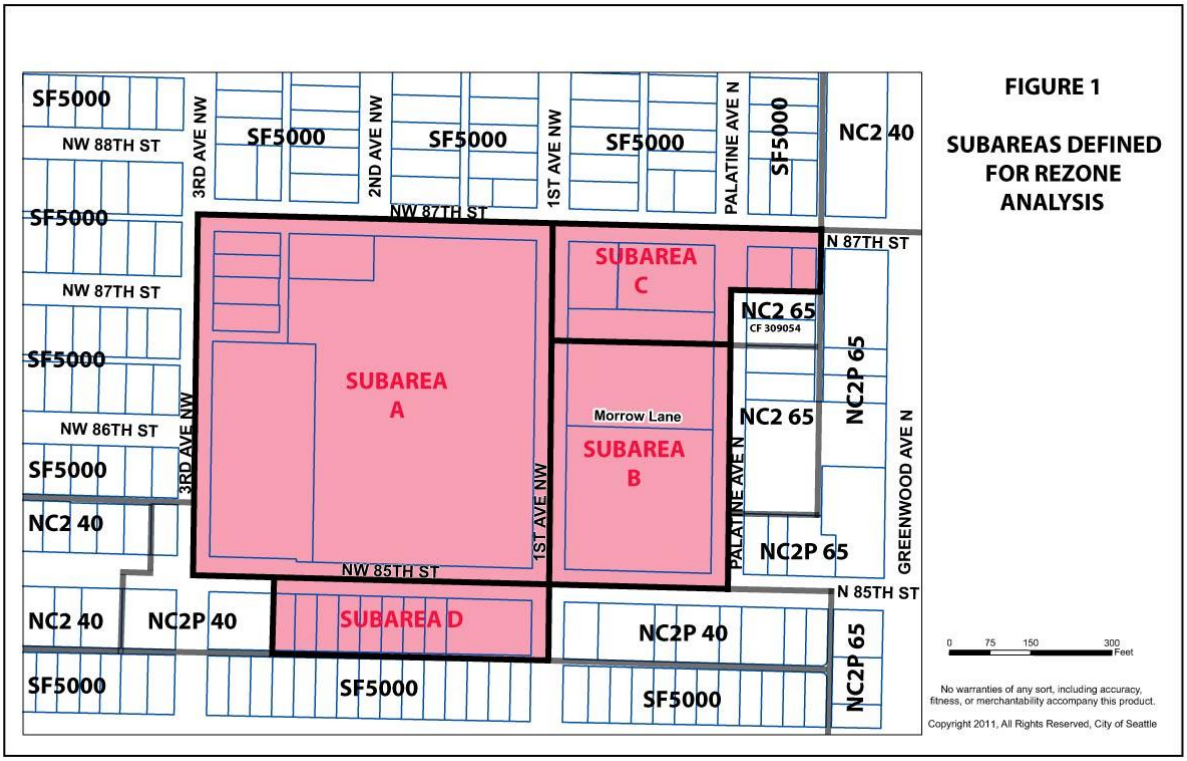
2. Rezone parcels between 1st Avenue NW and Palatine Avenue N, north of NW 85th Street from Commercial 1 (C1 40') to two zones: a Neighborhood Commercial 2 (NC2 65' (3)) and a Neighborhood Commercial 2 with a Pedestrian "P" designation (NC2P 65' (3)) for the property that abuts on NW 85th Street.

Subarea C

3. Rezone parcels near N 87th Street east of 1st Avenue NW to Neighborhood Commercial 2 from Lowrise 2 Residential-Commercial (LR2 RC) to (NC2 65' (1.3)).

Subarea D

4. Rezone parcels abutting the south side of NW 85th Street, west of 1st Avenue NW to a point 120 feet east of 3rd Avenue NW, from Neighborhood Commercial 2 (NC2 40') to Neighborhood Commercial 2 with a Pedestrian "P" designation (NC2P 40').



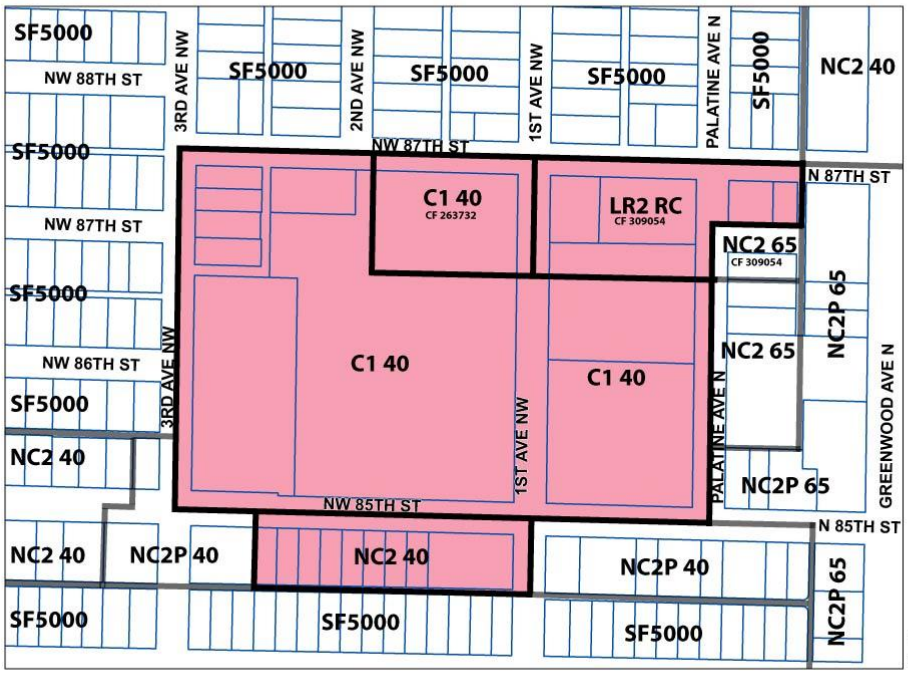


FIGURE 2

EXISTING ZONING IN STUDY AREA

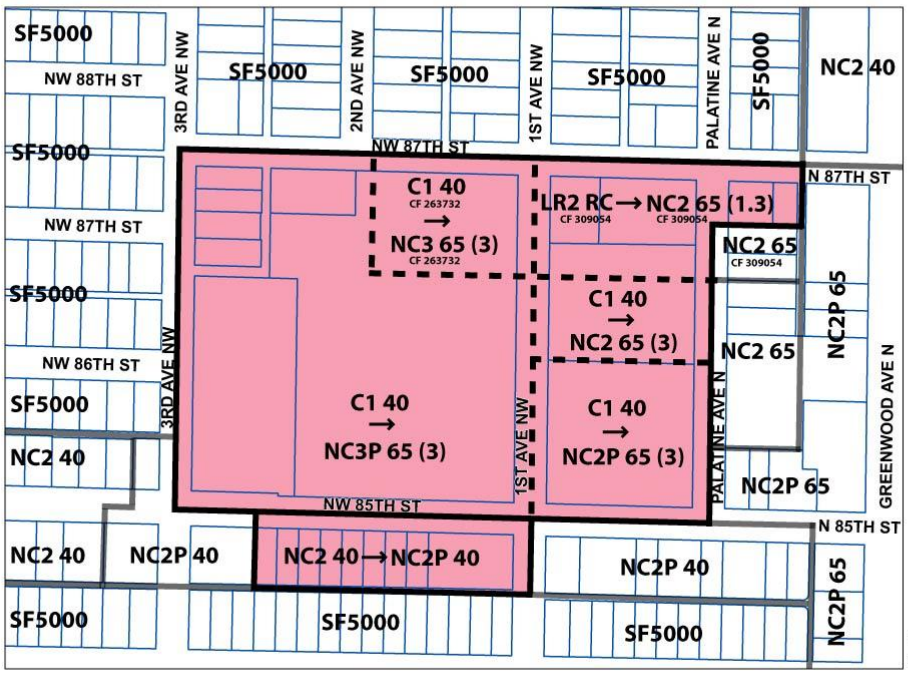


FIGURE 3

RECOMMENDED ZONING CHANGES IN STUDY AREA

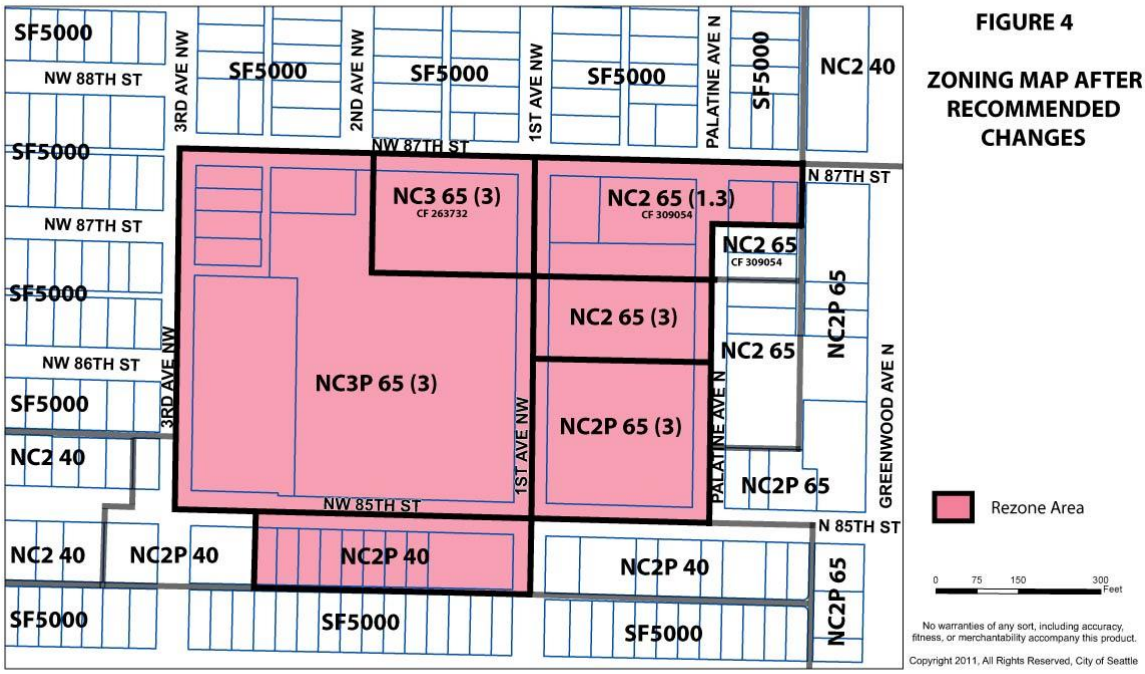


FIGURE 4

ZONING MAP AFTER RECOMMENDED CHANGES

FIGURE 5

2009 AERIAL PHOTO OF STUDY AREA

0 75 150 300 Feet

No warranties of any sort, including accuracy, fitness, or merchantability accompany this product.

Copyright 2011, All Rights Reserved, City of Seattle

ANALYSIS - OVERVIEW

The following describes the analysis conducted to determine if the proposal is likely to have a *probable significant adverse environmental impact*. This threshold determination is based on:

- *the proposal*, as described above and in accompanying analyses;
- the information contained in the *SEPA checklist;*
- additional information, such as analyses prepared by City staff; and
- the experience of DPD analysts in reviewing similar documents and actions.

ELEMENTS OF THE ENVIRONMENT

Adoption of the recommended rezones would result in no immediate adverse short-term impacts because the adoption would be a non-project action. The discussion below evaluates the potential long-term impacts that might conceivably result from the net differences in future development capacity and land use development patterns that would be related to the rezones.

Natural Environment

Earth, Air, Water, Plants and Animals, Energy, Natural Resources, Environmentally Sensitive Areas, Noise, Releases of Toxic or Hazardous Materials

The recommended rezones would result in no direct natural environment impacts because they are not associated with a specific development. The recommended rezones also are unlikely to result in significant indirect or cumulative adverse impacts related to earth, air, water, plants/animals, fisheries, energy, natural resources, sensitive areas, noise, or releases of toxic/hazardous substances. The rationale for these conclusions includes a lack of appreciable resources (such as for plants, animals and fisheries), an interpreted low probability that significant adverse increases could occur due to the added increment of future potential development (air quality, noise, toxic/hazardous substance release), and an interpreted low probability that significant adverse impacts could occur due to the probable enforcement of City rules and regulations that reasonably ensure impacts would be avoided or mitigated (with respect to potential earth and groundwater-related impacts).

Additional discussion describes the identified natural environmental conditions related to presence of peat soils and associated groundwater relationships in and near the rezone study area. Current rules on treatment of such areas also have a bearing upon the interpretation of the area's impact potential with future development. Based on the current City regulations that would apply to these environmentally critical areas, the probable requirement of project-specific mitigation measures with future development means that significant adverse impacts are not likely to occur.

Presence of Environmentally Critical Areas Including Peat Settlement Prone Areas, and Drainage and Groundwater Relationships

Subarea A: All of Subarea A is mapped as part of a large Category I peat settlement-prone area that extends several blocks northward and encompasses most of the Greenwood core district and other residential blocks to the north. This mapped environmentally critical area acknowledges the presence of peat soils in the shallow subsurface of the mapped properties (although more specific information has delineated that peat soils are present in the eastern 1/3 to 1/2 of Subarea A and in Subareas B and C). Past evaluations for other permits in the Greenwood core area have identified such soils are present and concluded that development, depending upon how it is accomplished, has the potential to adversely influence area groundwater levels and subsurface

drainage patterns. With the presence of low-lying areas north of the rezone study area that are occupied by single-family residences, future development in the rezone study area potentially could result in adverse impacts such as flooding of basements if groundwater levels are caused to increase, and/or settling of existing structures if significant dewatering or lowering of the groundwater would occur.

However, the presence of peat soils in the study area will affect how future development is designed, located and permitted, including its drainage control facilities. The regulatory controls will be the same in the level of scrutiny and the levels of protection provided, with or without zoning changes. Due to the extent of City regulations already in place, the requirement of impact mitigation measures that would be identified through project-specific reviews of future development proposals can be assumed as probable and likely adequate to avoid significant adverse impacts associated with peat and groundwater related to future development.

Briefly summarized, the City's existing regulations for peat settlement prone areas provide that:

- Development in a Category I peat settlement prone area (such as this rezone area) shall not increase the total impervious surface on the site unless the Director approves using an infiltration facility or soil amendments that offset the lost infiltration function. See DPD Director's Rule 14-2008 "Infiltration facilities in peat settlement-prone areas" for more information.
- No development shall occur within a peat settlement prone area below the elevation of the annual high static groundwater level (with exceptions for foundation components, utility lines, etc.).
- A geotechnical study detailing the location of the annual high static groundwater level is required for development in peat settlement prone areas that involve excavation more than 30 inches below existing grade (see DPD Director's Rule 13-2008).
- Parcel-specific delineations of peat settlement prone areas are only allowed on parcels greater than 50,000 square feet
- The City may require additional construction practices, methods and restrictions that would limit groundwater dewatering and other impacts;
- Standards for height limit and floor area limits may be modified on lots containing peat settlement-prone areas.

Subarea B: Conditions in Subarea B and conclusions about impact potential are similar to those described for Subarea A above.

Subarea C: Conditions in Subarea C and conclusions about impact potential are similar to those described for Subarea A above.

Subarea D: Peat settlement-prone area is not identified in Subarea D. However, a steep slope environmentally critical area is identified in this subarea. One single-family residential property and two commercially-used properties have apparent steep slopes that are partially contained by concrete bulkhead walls. Of these, only the single-family residence has substantial steep slopes at its edges – the other uses sit at the street level due to past grading. Additional grading or reinforcement of slopes might be needed, but future development likely can be permitted in any affected lot within Subarea D with completion of critical area reviews, and removal of soils

creating the localized steep slopes on the single-family residential property likely can occur if the property is redeveloped in the future. Therefore, no significant adverse impacts are identified in this determination.

Built Environment

Land & Shoreline Use, Height/Bulk/Scale, Historic Preservation, Housing

Increase in Zoned Development Capacity Yield* (*contains new development capacity analysis, with pending development projects factored into analysis)

Evaluation of impact potential for some environmental elements in this programmatic SEPA analysis relates to the net difference in future development outcomes that are likely to occur over the long-term with the proposed rezones. The most typical capacity estimation techniques that DPD uses are informed by the "zoned development capacity" (ZDC) model. This model exists for the purpose of analyzing citywide capacity for comprehensive planning purposes, and its results should therefore be cautiously interpreted when applied to small subareas. Based on factors and assumptions derived for purposes of land use planning for relatively large areas over a long time period, a ZDC-based method suggests a probable development yield that is less than the theoretical maximum amount of capacity change due to the rezones. This yield can be assumed as a reasonable estimation of the probable future development amounts (outcomes) under the zoning.

The ZDC-based analytic methods for rezone analysis have not been rigidly applied in the past but are flexible enough to allow for various kinds of specific future development assumptions to be made about specific properties, e.g., use of DPD's knowledge about existing local conditions and possible future outcomes. For example, while comprehensive planning analyses have in the past classified various properties as "not redevelopable" based on the condition and valuation of an existing structure, on a property-by-property basis a rezone analysis may interpret the probability of future development occurring (this is the case in Subarea B of the rezone area where an existing commercial structure is large enough to be considered "not likely to redevelop" but has been assumed for this analysis as likely to redevelop in the future).

Conversely, facts about certain properties may allow assumptions to be made that future development using the added development capacity will <u>not</u> occur. For example if a property is already committed to other uses such as drainage/conservation facilities (as in Subarea C of the rezone area) or is in retail uses that would not likely redevelop to use the added residential capacity in the foreseeable future (as in portions of Subarea A of the rezone area where the single-purpose retail Fred Meyer structure with surface parking is proposed for expansion with added retail area and parking). Such judgments are made for ZDC-related SEPA analyses in order to represent reasonable, probable levels of future development that will support a reasonable assessment of impacts.

The recommended rezone means the maximum permissible mixed-use development density would increase by a floor area ratio (FAR) of 1.5 (from 3.25 to 4.75), based on the maximum density allowances for commercial zones in the Land Use Code. This means the theoretical maximum net additional floor area that could be built at the affected properties would be equivalent to 1.5 times the area of the property. However, in response to the Hearing Examiner's remand, for this analysis ZDC-related factors and assumptions were used to assess the probable future development yield for properties deemed likely to be redeveloped. These properties

include: two "outparcels" that are proposed in Subarea A as part of a current set of land use and development actions; an eventual redevelopment of the property in Subarea B, replacing the existing retail structure; a vacant parcel west of Palatine Avenue N. in Subarea C, and other residentially-occupied property east of Palatine Avenue N in Subarea C. No net future development implication is identified in Subarea D because the ZDC-related factors for the existing and proposed zones are identical (e.g., no change in future amount of development is estimated as likely between the existing NC2-40' and the proposed NC2P-40' zone).

The calculated net effect of the proposed rezones upon the future development yield of the rezone area is identified as: +99 dwelling units and +29,637 square feet of non-residential uses. This addresses the net added development yield due to the rezones upon the properties deemed likely to redevelop, as described above.

Location: Subarea & Parcel	**Net Gain in Residential Development Capacity With the Rezone (Dwelling units)**	**Net Gain in Non-Residential Development Capacity With the Rezone (Square ft., floor area)**
Subarea A Fred Meyer out-parcel 1	+17	+3,555
Fred Meyer out-parcel 2	+14	+2,916
Subarea B Existing retail building parcel	+35	+7,155
Subarea C Vacant parcel without pond	+22	+10,740
Other parcels east of Palatine Ave. N.	+11	5,271
Subarea D No change in development capacity with the P-zone proposal	0	0
TOTALS	+99	29,637

<u>Land Use and Height/Bulk/Scale Impacts</u>

The recommended rezones would result in no direct impacts to land use because they would be part of a non-project action. The recommended rezones would encourage future development that would be consistent with the intent of Comprehensive Plan policies for this area, by encouraging denser mixed-use development patterns within the Greenwood commercial core area within its Residential Urban Village. The probable effect of the rezones would be for predominant land use patterns in the study area to move away from existing automobile-oriented, low density uses with parking lots at their street edges to a finer-grain mixed-use pattern that accommodates more future growth, that leads to a probable greater future resident population, and that would likely feature more pedestrian-oriented land uses at street level, resembling the current patterns just east of the rezone study area. This would occur through future infill development projects over the next few decades. These conclusions are not identified as adverse impacts but rather indicate consistency with the intent of the City's neighborhood plans in this vicinity.

Subarea A:

With the recommended rezones, the intended future development pattern in Subarea A would be more compatible with the surrounding residential neighborhoods than would potential development under the existing zoning. This interpretation is based on conclusions that the existing and possible future land use patterns, under the existing C1 zoning, of street-fronting parking lots and set-back single-use buildings would be less hospitable to pedestrians and visually less appealing than what would likely occur with future development under NC3 zoning.

The proposed reconstruction and addition to the Fred Meyer store, even if the zoning changes, would mean the large commercial structure land use pattern would likely continue to be present on that block for decades. However, it is probable that a pattern of increased density and possibly increased residential presence would eventually occur in the long-term future. This denser pattern could also be facilitated due to the property owners' proposed reconfiguring of lots to define two out-parcels corresponding to the southeast and southwest corners of this block, along 85th Street, which would encourage their eventual infill development with denser and possibly mixed-use buildings.

The recommended increase in height limit to 65 feet would increase the capacity for development compared to the current zone, which would mean a probable increased overall activity level in the subarea and its surroundings when the subarea eventually experiences infill development over the long term. Such increased intensity of use, if future development using the added capacity came to fruition, would contribute to adverse impacts in the vicinity such as increased street traffic.

The recommended zoning in Subarea A would occur on properties that are separated by 60-foot wide street rights-of-way from low-density residential zones to the north, which would provide for a reasonable physical separation and transition from future development in the rezone area to nearby single-family residences north of NW 87th Street. In other words, significant adverse impacts caused by adjacency of non-residential buildings to such residences are not likely to occur.

Subarea B:

Subarea B would accommodate future mixed-use development in a manner that is supportive of Comprehensive Plan objectives for this Urban Village, and its recommended NC2 zoning and 65-foot height limit would be the same as for the Greenwood commercial core properties directly to the east. The recommended NC2 65' zone would also set certain limits on sizes of typical uses such as restaurants and stores that would help future development to be compatible with the character, pattern and sizing of businesses at street level in the adjacent Greenwood core properties to the east. Adverse impacts from increased intensity of use with future development are expected, as identified for Subarea A. However, significant adverse land use or height/bulk/ scale compatibility impacts are not likely to occur, due in part to the land use compatibility factors described in this paragraph.

Subarea C:

This 1.4 acre subarea includes a new parking lot associated with a mixed-use building in Subarea B, but primarily consists of vacant property that is grassy and contains a drainage control pond at its western edge. It also includes two properties east of Palatine Avenue N that are currently occupied by single family residences converted to duplexes. Clerk File 309054 indicates that this subarea's drainage control pond is part of an environmental conservation area that was defined in conjunction with the rezone of another property east of Palatine Avenue N.

Subarea C's location places it to the rear of the Greenwood Avenue N. and N. 85th Street commercial corridor properties, at the north edge of the Greenwood core that transitions to single-family residential blocks north of NW 87th Street. Subarea C's context is influenced by the presence of the Fred Meyer two-story retail structure directly to the west, which helps define NW 87th Street as the boundary of the commercial/mixed-use district. This is also reinforced by the adjacent presence of the 6-story mixed use building on Greenwood Avenue N, which is directly across an alley east of Subarea C. The NW 87th Street right-of-way would continue to serve its current role as a transitional space that buffers the area to the north, due to its 60-foot width and its demarcation between the low-density residential blocks to the north and the commercial/ mixed-use area to the south. No significant adverse land use impacts are identified for Subarea C, but similar to Subarea A there would be the potential for adverse impacts related to increased intensity of use and increased activity level in the immediate vicinity if future development occurs in Subarea C.

Subarea D:

This 1.4 acre subarea consists of eight parcels on the south side of NW 85th Street west of 1st Avenue NW to within one parcel east of 3rd Avenue NW. Presently, the zones on either side of this area include a Pedestrian "P" designation in NC2-40' zones, but Subarea D properties are in a NC2-40' zone without a "P" designation. These parcels contain three single-family structures, two multifamily residential uses with approximately 9 dwelling units, one commercial office structure, one automobile service use and one vacant commercial structure with its lot in use as outdoor storage and a portable coffee stand. One of the multifamily structures also has a street-front grocery at ground level facing NW 85th Street.

In Subarea D, a Pedestrian "P" designation is recommended to be added to encourage and require a continuous ground-floor commercial use frontage that will increase pedestrian orientation and interest in this portion of the Greenwood/Phinney RUV as future development occurs. The existing alley south of the Subarea D properties would continue to provide separation from the adjacent single-family zoned properties to the south as it does today. Also, the recommendation would not increase the height limit in Subarea D. Because of these land use-related factors, no significant adverse land use impacts are identified from the recommended addition of a Pedestrian "P" designation in Subarea D.

Historic Preservation

The rezone study area does not possess a historic character, nor does it contain structures likely to have significant architectural or historical value. The nearest buildings that have been inventoried for their possible historic value include the Taproot Theater east of the study area, several other structures in the Greenwood commercial core, and a nightclub structure located

across the street from the study area at 3rd Avenue NW/NW 85th Street. Although the recommended rezones include a 25-foot increase in height limit across the street from the nightclub location, no significant adverse impacts would occur in relation to the nightclub structure or its potential historical value, due to the degree of transition provided by the width of 3rd Avenue NW.

Housing

The recommended rezones would affect one multifamily residential property in Subarea A, one mixed-use structure in Subarea B, two duplex structures in Subarea C and approximately seven residential properties in Subarea D. However, of these only the duplex structures in Subarea C and a few of the single-family structures in Subarea D may face future demolition if redevelopment occurs, totaling 6-10 dwelling units. The multifamily structures in Subareas A and B are likely to remain in the future even if the rezones occur. This potential loss of housing units might occur with or without the rezones because existing development is less dense than what is allowed by the current zoning. The recommended rezone would provide for the development of a larger total amount of housing units in the study area than could be built under existing zoning, and would encourage provision of affordable housing as part of that supply. All of these findings indicate that no significant adverse housing impacts are anticipated from the recommended rezones.

Transportation* ***(*contains a revised, expanded, quantitative traffic/transportation analysis)***

The proposal would not result in direct transportation impacts as it is a non-project proposal. The proposed rezones would increase the overall development capacity available for future development on affected properties. This means there would be the potential for increased traffic demands and congestion on Greenwood streets near the rezone area. The expected timeframe for such increases would be over the long-term of 10-30 years or more. The extent of future traffic-related impacts relevant to this rezone will depend upon whether the net added amount of zoned capacity is ultimately used by future development and the future performance/signalization levels that can be achieved on the street system.

The identified net increase in future development yield would generate increased demand for transportation systems. The estimated maximum increase in primary vehicle trips from future potential development attributed to the rezones is 1,517 daily trips and 136 PM peak hour trips. Using the City's methods for estimating the directional distribution of this traffic, the estimated PM peak hour volumes for each corridor would be as follows:

Estimated distribution of peak hour vehicle trips generated (routes and directions)

	Total trips to or from
NW 85th Street west of 3rd Avenue NW:	16 trips
3rd Avenue NW north of NW 85th Street:	16 trips
3rd Avenue NW south of NW 85th Street:	9 trips
Greenwood Avenue N north of NW 85th Street:	27 trips
Greenwood Avenue N south of NW 85th Street:	14 trips
N 85th Street east of Greenwood Avenue N:	54 trips
TOTAL	136 trips

(Source: Shaw, DPD, 2011/2012)

The trips in the last two categories listed above would be those likely to travel through the 85th/Greenwood intersection, e.g., to/from easterly and southeasterly locations, the intersection would experience an increase of 68 PM peak hour trips. For the trips identified to/from Greenwood Avenue N north of 85th Street, the shortest, quickest and easiest route via N 87th Street to/from Greenwood Avenue N is assumed.

Impacts on level of service the 85th/Greenwood Avenue N intersection are estimated using a comparison to a recent traffic analysis conducted by Transpo for a Fred Meyer development in Subarea A of the study area, which allows an estimate of added delay to be inferred as appropriate for a non-project analysis. In June 2011, a forecast of 107 additional PM peak hour trips through that intersection resulted in a modeled two-second increase in peak hour delay, from 51 to 53 seconds, due to the Fred Meyer development. This modeled near-term future (2012) traffic conditions. At a similar rate of delay creation and assuming similar baseline traffic conditions, the additional 68 PM peak hour trips from the proposed rezone's estimated maximum potential future development would generate approximately 1.3 seconds of added delay. This added rate of delay is not considered significant and does not warrant mitigation (Shaw, DPD, 2011).

The estimated peak hour trip generation for the directions/streets other than those passing through 85th/Greenwood would range from 9 to 27 additional trips per hour, including trips in both directions. This equates to an additional trip roughly every 2 to 7 minutes on these directions/streets, and is interpreted to not generate significant adverse impact potential.

For reference purposes and evaluation against a future possible set of baseline conditions, the estimated future (2012) weekday PM peak hour level of service findings by Transpo for the area, with the proposed Fred Meyer store development, are shown below. If the estimated findings above for this rezone's impacts are added to these baseline conditions, the result would likely be conditions that maintain the intersection levels of service identified below with small increments of added delay, such as the 1.3 seconds of added delay identified in the analysis above at 85th Street/Greenwood Avenue N (Shaw, DPD, 2011).

	LOS	**Delay (seconds)**	**Vehicle/capacity (v/c) ratio or WM**
85th/8th	D	37	0.82
85th/3rd	D	44	0.75
87th/3rd	C	17	WB
87th/1st	A	8	EB/WB
85th/1st	A	9	0.38
85th/Greenwood	D	53	0.88
85th/Dayton	A	7	0.45
85th/Fremont	A	4	0.39
85th/Aurora	D	53	0.87
Green Lk Dr/Aurora	B	20	0.6

(Source: Transpo, 2011)

The City's Transportation Department (SDOT) has reviewed these estimated findings and agrees that the added delay would be very small (SDOT, 2012).

Mitigation is not identified as needed, given the findings above. However, mitigation strategies can be discussed, with respect to what actions would be possible to address the extent of incremental impacts identified in this analysis.

In a case where the added delay is so minor, SDOT has determined timing changes are not required as part of a development project or rezoning. Timing changes, if needed, would be made as part of regular optimization efforts along the Greenwood Ave N and N 85th Street corridors. In cases where left turn volumes change, even a small-to-moderate change, SDOT would adjust signal timing for left turns. However, the left turn volume changes identified here do not warrant a change to signal timing (SDOT, 2012).

Existing arterials including NW 85th Street and Greenwood Avenue N already experience varying degrees of traffic congestion through the day but most notably during morning and evening commute hours. Traffic models of future conditions citywide predict that this area's arterial corridors from Greenwood Avenue N. to 8th Avenue NW, and between N 80th and N 145th Street, (evaluated as part of "screenline" analyses) will continue to be congested but, as a whole, will have adequate overall street system capacity to meet long-term needs. To the extent that future development projects might generate additional traffic volumes on NW 85th Street that warrant adjustments in roadway configuration or signalization performance, it would be possible for the City to require targeted street improvements, such as turn pockets in the rezone study area, and/or adjustments in traffic signal timing, that would reasonably ensure adequate street system performance can be maintained. SDOT does recommend left turn pockets on N 85th St. at 1st and 3rd Avenues NW. Future projects that add traffic to that intersection could make a contribution toward that improvement. Future developments also could make allowances for sufficient width of right-of-way to accommodate the extra lane.

Public Services and Utilities* ***(*contains new impact analysis on police and fire services, and other public services)***

The recommended rezones would not directly generate impacts on service/utility capacity, but would increase development capacity that, if used in the future in the worst case, would enable additional demands for public services and utilities, including police/fire protection, parks, schools, and water, sewer, drainage and electrical utility service. These could result in potential adverse but not significant adverse impacts on public services and utilities. Also, see the cumulative impact analysis for related impact conclusions.

Police Protection

Police protection in the Greenwood area is provided by the Seattle Police Department's (SPD) North Precinct. This is within the "Boy" sector of the North Precinct, for which typical staffing is 5-6 officers per patrol shift. Police services to this area also include other staffing for duties such as community policing, anti-crime team emphasis, crime prevention and criminal investigations. SPD does not have an official level-of-service policy for officers-per-thousand population. Rather, SPD evaluates service coverage based on three elements: maintaining a seven-minute average emergency response standard; allowing time for proactive work with members of the community on current crime issues; and having ten cars free citywide (two per precinct) at any time for proactive work and backup response. The average response time is currently in the 6-7 minute range. SPD's staffing allocation at any given time is dynamic, with more resources generally dedicated to cover areas where call volumes are higher (SPD, 2012)

Future growth in population and employment in Greenwood and within north Seattle, with or without zoning changes, will gradually increase demands for police protection. The added development capacity of about 100 dwelling units and 30,000 square feet of commercial space, if developed, would slightly increase these future demands for police services. An increasing residential presence could increase call volumes related to domestic disputes, burglaries, vandalism and auto theft; shoplifting and graffiti are other possible outcomes of the added zoning capacity as well.

However, by itself, the proposed rezone and related future development would not be likely to generate significant adverse impacts upon police protection. This magnitude of change would not likely significantly influence SPD's call volumes, staffing needs or manner of providing protection (SPD, 2012). Staffing changes over time for the Greenwood vicinity will depend upon future City budgeting decisions as well as the Chief's decisions regarding assignment of patrol officers to the North Precinct (SPD, 2012).

SPD does not predict or rely upon growth-related increases in call volumes or make predictions about needs for additional police officers, because there are too many unknowns to allow for accurate forecasts (SPD, 2012). Experience suggests that community unlawful activity can arise due to "environmental" factors such as low lighting and vacant lots, independent of the number of residents or employees in a neighborhood. As well, factors such as more "eyes on the street" and more continuous street-level uses can help to limit these factors' effects on generating call volumes. SPD recommends that future developments use "Crime Prevention Through Environmental Design" (CPTED) principles that are meant to minimize numbers of unsafe places in a community's environment.

Fire/Emergency Protection

Seattle Fire Department (SFD) provides fire protection and emergency services to the study area. Fire Station #21, approximately 10 blocks south of the rezone area, serves the area with one fire engine company. Equipment and staff resources at Fire Station 21 include:

- One fire engine company (4 staff on duty per shift)

Other fire stations, #35 on 15th Ave NW, #31 on N Northgate Way, #16 on NE Oswego Place, and #18 on Market Street, are available to respond to calls in the broader northwest Seattle vicinity. These would be the first responders to areas including Crown Hill, north Greenwood, and Ballard respectively.

SFD data indicate typical responses times ranging from 4 to 5+ minutes for fire and other calls. Trends in call volumes show a slight downward trend in emergency fire calls and total calls, down from recent highs about five years ago.

The rezone proposal would result in future possible development that could be a maximum of 65 feet, or 25 feet higher than is currently allowed in the Greenwood core area. Given the staffing and equipment resources available at the nearest fire stations, SFD concludes that the rezone and its estimated increase of 99 dwelling units and 30,000 square feet of additional commercial space would not result in significant adverse impacts upon SFD's staffing or equipment resources (SFD, 2012). SFD's available equipment and staffing would be able to provide sufficient protection to future possible development reaching 65 feet in height. The affected fire stations have the available capacity to handle the additional responses that would be generated by the increase in square feet and population (SFD, 2012).

Parks and Recreation

Park/recreation features in the Greenwood neighborhood include 3.7-acre Sandel playground (NW 90th St/1st Ave NW) and 2.2-acre Greenwood Park (N 87th St/Fremont Ave N). Both include playgrounds and open space, and features such as a wading pool and basketball court are also available at Sandel. The playground at Sandel was improved and expanded in 2011. At approximately ¼ mile away from the rezone area, these facilities are reasonably near the Greenwood/Phinney urban village, although greater than a preferable 1/8 mile distance per parks planning standards. Other neighborhood area to the north is within a preferable ¼ or ½ mile of open spaces, in contrast to the Phinney neighborhood west of Greenwood Avenue N and south of 80th Street which is in an under-served "gap" area (Parks' Open Space Gap Report, 2006).

Future development associated with the rezone (up to approximately 100 households) would add new resident households that would incrementally increase park/recreation demands upon existing facilities. Parks planning standards indicate a "desirable" amount of 1 acre per 1,000 households, and an "acceptable" amount of 0.25 acre per 1,000 households. If equated to these standards, this level of growth would correspond to a demand that would be satisfied by 0.025 to 0.1 acre of additional park/open space. This added increment would not be considered to represent a significant adverse impact upon parks/recreation facilities (Parks, 2012).

Schools

Seattle Public Schools (SPS) serves the rezone area. The nearest schools include Greenwood Elementary, Whitman Middle School, and Ballard High School. Students living north of 85th Street attend Ingraham High School. Other elementary schools in the area include Whittier to the west, West Woodland to the south, Viewlands to the north, and Daniel Bagley to the east. Student assignment to schools is primarily geographically based, subject to a "New Student Assignment Plan" that is being phased in over several years, and subject to assignment to educational programs addressing advanced learning, language learning and other programs. Students may attend schools outside their geographic area, subject to availability, in an open application process.

SPS facilities capacity management is influenced by the combination of student assignment plans, details relating to the 2010 "BTA" levy, and a Building Excellence Capital ("BEX IV") levy planned for 2013. Future attendance patterns and facility capacity will relate to the status of levy-funded capital projects, trends in student residence locations and, correspondingly, how school attendance area boundaries are drawn and adjusted. Intermediate term capital planning estimates predict slight declines in enrollments over the next 4-5 years at Greenwood Elementary, but increases in enrollments at Whitman Middle School, reflecting an expected upward trend in overall district enrollment. SPS staff are monitoring these trends in order to identify and implement the needed level of capacity through permanent and/or interim solutions (SPS, 2012). SPS facility planning analysis indicates that Greenwood Elementary's predicted enrollment will equate to 90% of the school's enrollment capacity in the 2015-2016 school year. This is the second lowest predicted utilization of capacity in that year in the Whitman Middle School service area that encompasses most of northwest Seattle. This finding suggests that elementary school capacity at Greenwood is not likely to be a significant impact concern over the next three years or so (SPS, 2012).

Given SPS' methodologies used for predicting enrollments (relating to births and cohort survival assumptions), it does not use schoolchildren-per-dwelling unit factors to estimate specific enrollment impacts of future development (SPS, 2012). Use of such factors to calculate students and add them to other SPS enrollment planning estimates could create errors related to overestimating or "double-counting." Also, the nature of the added development capacity with the proposed rezones should be recognized: the added development capacity might or might not be ultimately used in future development, and might occur over the next 5-30 years rather than in a specific near-term timeframe. The most basic finding that can be drawn is that the proposed rezones would increase, by approximately 100 households in the worst case, the potential amount of future growth that might occur in the area served by Whitman Middle School. This can be interpreted as a potential adverse impact upon SPS, but lacking any other specific knowledge about when such capacity might be used, it is not interpreted as a "probable significant adverse impact."

Water and Sewer Service

A review by City public utilities staff indicates that water and sewer systems in the study area would have adequate capacity to accommodate future development, as long as any needed site-specific connection improvements would be provided at the time of future development. The presence of separated storm sewer and sanitary sewers in the area north of NW 85th Street, and the direction of flow toward facilities in NW 87th Street, means that overflow potential would be limited because the two types of sewage flows would not be combined in single pipes within the heart of the rezone study area. The combined facilities in NW 85th Street that may serve abutting properties including those in Subarea D could have some local limitations warranting utility improvements that may occur with or without future development. However, because Subarea D's recommended zoning would not increase development capacity, no significant adverse impact potential is identified there.

In comparison to the analysis for the April, 2011 SEPA Determination of Non-Significance, this updated analysis notes that the proposed 55,000 square foot expansion of the Fred Meyer store will mean a significantly reduced potential for future development for the foreseeable future within Subarea A. The prior analysis estimated an approximately 541,000 square foot net increase in development capacity in Subarea A. The updated analysis is that future development might still occur in the future on approximately 1.5 acres of proposed outparcels in this subarea, but the net increase in future development yield on those parcels due to the rezone would amount to less than 10,000 square feet of building space. As well, the overall calculated net change in development yield for the entire rezone area would be less than previously analyzed, amounting to +99 dwelling units and +30,000 square feet of non-residential space. This considerable decrease in probable future development yield compared to the prior analysis means that the potential risks of future development-related adverse impacts upon the water and sanitary sewer utility systems are considerably lower than previously analyzed for the April 2011 SEPA Determination of Non-Significance.

In conclusion, no probable significant adverse water or sewer system impacts are identified as a result of this rezone proposal. Also, see the cumulative impacts discussion below.

Electrical Utility Service

A review by a City Light staff person indicates that the area's substation and electrical system has sufficient capacity to handle the maximum projected loads from added growth, with only minor site-specific feeder line improvements to be coordinated at the time of future development (City Light, M. Kirk, 2011).

Cumulative Impacts* ***(*contains new cumulative impact analysis)***

"Cumulative impacts" refers to the potential for an action, along with other prior or simultaneous actions (e.g., usually developments), to generate combined or "cumulative" impacts, and/or possibly to "directly induce" other developments. The proposed rezone is a non-project action, and the other portions of this Determination evaluate the potential long-term development impacts that might conceivably result from the net differences in future development capacity and land use development patterns that would be related to the rezones. DPD's analysis does not identify any potential to "directly induce" any other development. However, this cumulative impact analysis reviews the potential for cumulative impacts that might arise due to the combination of impacts with other known development proposals in the broad vicinity.

To assess the potential for cumulative impacts, Land Use Information Bulletin notices were reviewed for the period between June 2011 and January 2012, to identify what other current development proposals are known in the rezone area and within approximately 1-1.5 miles of the rezone area. This review identified six proposed developments of varying sizes, other than the redevelopment/expansion proposal at the Fred Meyer properties:

- Taproot Theater remodel/expansion (12,200 square feet) on 85th Street near Greenwood Ave N. (in the rezone area);
- 263 dwelling units and 3,900 square feet of commercial space at the former Leilani Lanes site at 102nd St./Greenwood Ave N. (north of the rezone area);
- 54 dwelling units and 3 live-work units at 107th St./Greenwood Ave N. (north of the rezone area);
- 48 dwelling units and 4 live-work units near 80th Street/15th Ave NW (southwest of the rezone area);
- 101 dwelling units and 3 live-work units near 67th Street/15th Ave NW (southwest of the rezone area);
- 19 dwelling units and 2,700 square feet of commercial space near 61st Street/Phinney Ave. N. (south of the rezone area);

Other than these, two or three short plat lot divisions involving one or two lots each were also identified east of the rezone area.

The Fred Meyer redevelopment and related projects includes a 55,000 square foot expansion of the Fred Meyer store, the demolition of a 21,000 square foot grocery store, and property boundary adjustments that would include definition of outparcels oriented toward the southwest and southeast corners of the block.

This interpretation of cumulative impacts first notes that these proposals (other than the relatively small Taproot Theater expansion, and the Fred Meyer redevelopment) are 15-25 blocks distant from the rezone area, thus lacking close proximity to the rezone area. As such, in

reference to most environmental elements they would contribute minimally or not at all to cumulative adverse environmental impact potential. This includes, for example, a lack of meaningful adverse impact potential for land use intensity-related or height/bulk/scale-related impacts, or air quality, earth, plants and animals, parking, view- or shadow-related impacts, due to lack of proximity to the rezone area and lack of concentration of development. The number and pattern of current development proposals instead demonstrate a disparate pattern of infill development projects in northwest Seattle. The two nearest development proposals at 102nd and 107th Streets along Greenwood Avenue N are roughly 2/3 to 1 mile north of the rezone area.

Public Services: Police, Fire, Parks, Schools

Police

On the topic of cumulative impacts on police protection, SPD has reviewed the locations of other known future development proposals provided by DPD. In combination with the rezone-related impacts identified above, the known development proposals for about 320 dwelling units near Greenwood Avenue N/N 105th Street would be expected to contribute to minor increases in call volumes in the "Boy" and "Nora" sectors of the North Precinct. These would result in an increased demand for police services that would be a minor adverse cumulative impact (SPD, 2012). This might result in precinct commanders allocating more coverage to this patrol area over time, but would not generate a significant adverse need for additional police staffing. The other proposed developments, such as on 15th Avenue NW, would involve approximately 170 new residential units, all within the "Boy" sector of the North Precinct. These would also contribute incrementally to increased demands for police service over time. In summary, SPD concludes that the overall potential for cumulative impacts upon police protection is adverse but would not likely contribute in a significant direct manner to the need for additional police staffing (SPD, 2012). Also, refer to the discussion of fire protection impacts earlier in this document.

Fire Protection

SFD has also reviewed the locations of other known future development proposals provided by DPD. In combination with the rezone-related impacts identified above, the known development proposals would be expected to contribute to minor increases in call volumes, which would be divided among Stations #35, #31, #16 and #18. Given the broad geographic distribution of the known development proposals, the overall cumulative impact of increased call volumes shared among these stations would be minor and adverse, but not significant (SFD, 2012). SFD will continue to plan for its future staffing and other resource needs based on its assessments of overall citywide needs, and factors such as funding levies and budget considerations (SFD, 2012). Also, refer to the discussion of fire protection impacts earlier in this document.

Parks and Recreation

In terms of cumulative impacts upon parks/recreation, the most relevant identified developments could occur near N 105th St./Greenwood Ave N, and include about 317 new dwellings. Along with the rezone-related additions of up to 100 households, the total of about 417 added households would contribute incrementally to demands upon Sandel playground and Greenwood Park. If equated to the parks planning standards, the cumulative impact would be satisfied by 0.1 to 0.4 acres of additional park/open space. This added increment would not be considered to represent a significant adverse impact upon parks/recreation facilities (Parks, 2012). The other pending development proposals described below as part of the cumulative impact analysis would be served

by other park/recreation facilities nearest their locations, so they would not be likely to generate an adverse cumulative increase in park/recreational demands upon Sandel playground or Greenwood Park (Parks, 2012). Parks planning that includes facilities improvements related to the Parks and Green Spaces Levy is anticipated to provide improvements to Seattle parks facilities, which include already-completed Sandel Playground improvements and a planned park near the Greenwood Library, that will help address future park/recreation needs, including in north Seattle in this affected area (Parks, 2012). Also, refer to the discussion of parks and recreation impacts earlier in this document.

Schools

With respect to cumulative impacts, SPS staff has reviewed DPD's information on known future development proposals and concur with DPD's conclusion that near-term growth of residences from proposed development could lead to higher enrollments in area schools. Of the identified known development proposals, all are located outside the Greenwood Elementary service area, and most are located in different elementary school service areas from one another, except for the two proposals located near 105th St./Greenwood Ave N. that are both in the Viewlands Elementary service area and that could total up to 317 new dwelling units. As noted above, it is difficult to interpret whether such new development would represent "additional" potential enrollment growth or whether such housing would merely provide residences for growing student populations that SPS models have already predicted. Such near-term growth, combined with a hypothetical additional long-term growth potential due to the proposed Greenwood rezones, can be interpreted as a potential adverse impact, but is not interpreted as a "probable significant adverse impact." SPS will continue to plan for and implement facility improvements, and make other enrollment policy choices that are likely to provide sufficient facility capacity over both the near-term and the longer-term horizons. Also, refer to the discussion of schools impacts earlier in this document.

Utilities: Water, Sewer, Electrical Utility Service

Although limited in number and relatively distant from the Greenwood rezone area, the pattern of known future development proposals was examined with respect to its potential to contribute to the accumulation of impacts upon the utilities/service providers that also serve the Greenwood urban village.

Water and Sewer: The scattered locations and lack of proximity to the Greenwood rezone area means that significant adverse cumulative impacts upon water, sanitary sewer or storm-drainage systems are not likely to be generated (Seattle Public Utilities [SPU]: McNerney, Burke, Horbelt, 2012). This conclusion is made because: 1) the other known developments would be served via connections to the system infrastructure available in those locations, with expectation that localized improvements would be made if necessary (for example to provide sufficient fire flow pressure to a property); and 2) the utility systems, generally speaking, are structured and sized to provide sufficient service levels across this broad northwest Seattle vicinity, which means that the identified amount of increased development capacity in Greenwood, combined with other known development proposals, would not generate significant cumulative systems operations or capacity concerns (SPU: McNerney, Burke, Horbelt, 2012). This conclusion is also supported because of SPU's ongoing efforts to evaluate and implement system improvements in north Seattle over time, to aid the reliability, efficiency and safety of those utility systems. Also, it should be noted that for the sewer and storm-drainage systems, the destination of the wastewater and drainage flows from the other known development proposals would in most cases not relate

to the destination of flows from the rezone area, and on-site improvements with future development should aid in improving storm flow controls and water quality compared to the existing conditions (SPU, Horbelt, 2012).

Electrical: Similar to the analysis of direct impacts upon electrical utility service, the potential is low for cumulative adverse impacts from the combination of future rezone-related development and other known development proposals in the area (such as 250 to 300 dwelling units north along Greenwood Avenue N.). This is due to the magnitude of existing available system capacity and the relatively slow pace in anticipated future growth in electrical demand in this part of Seattle (City Light: M. Kirk, 2012).

Transportation

The two future developments north along Greenwood Ave N near N 105th St, totaling 317 dwelling units plus a few other uses, would be expected to generate daily traffic that would pass through Greenwood streets and thus contribute incrementally to potential adverse cumulative impacts on street traffic volumes. Per analysis for the former Leilani Lanes site proposal, it would generate 22 added vehicle trips in the PM peak hour that would likely use Greenwood Avenue N or other streets in the rezone vicinity (approximately half northbound and half southbound). At similar rates, the other current development proposal at 107th/Greenwood Ave N would generate approximately 5 additional PM peak hour trips through or near the Greenwood rezone area. SDOT has reviewed these findings and agrees the identified trip volumes would add to the cumulative impact potential that could be experienced in the Greenwood rezone area, but significant adverse cumulative impacts are not anticipated (SDOT, 2012). Signal timing adjustments would be the reasonable and recommended approach to address future concerns that might arise due to added through- or turning-movement delays (SDOT, 2012).

The Taproot Theater and related office and café expansion could also generate additional trips, amounting to an estimated 11 or fewer trips during the PM peak hour (Heffron, 2010) that would contribute incrementally to cumulative increases in traffic volumes. Other identified pending development proposals could also contribute a handful of trips to Greenwood, but this is less certain given their greater distance away from the neighborhood and their location on other arterial routes such as 15th Avenue NE that would instead likely result in use of other travel routes for most purposes. (Review the Transportation section earlier in this analysis for reference to impacts related to the Fred Meyer project.)

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.030.2.c.

[ ] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030.2.c.

Signature: (signature on file) Date: March 8, 2012
William K. Mills, Land Use Planner III
Department of Planning and Development