

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

**SEPA Threshold Determination
for the
Unified Grocer Warehouse Site Rezone**

Project Sponsor: City of Seattle Department of Planning and Development (DPD)

Location of Proposal: The site is located at the intersection of Airport Way S./S. Norfolk Street, just south of Boeing Field and west of Interstate 5, extending south and west to the abutting City of Seattle municipal boundaries. The site, identified as the “Unified Grocer warehouse property,” lies just north and east of the City of Tukwila near the Boeing Access Road.

BACKGROUND

Proposal Description

The proposal consists of a rezone recommended by DPD for an approximately 29-acre portion of the Greater Duwamish Manufacturing & Industrial Center. The affected area has primarily served as a grocery products distribution center for many years with two large warehouse structures, one office structure and other small structures.

The rezone would be from the existing General Industrial 2 (IG2 U/85) zone to an Industrial Commercial (IC U/85) zone. The IC zone is also an industrial zone, but it accommodates a greater amount of non-industrial uses than the IG2 zone. The IC zone is intended to promote development of businesses that incorporate a mix of industrial and commercial activities including light manufacturing and research and development, while accommodating a wide range of other employment activities.

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;
- 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 rezone would result in no immediate adverse short-term impacts because the adoption would be a non-project action. The discussion below evaluates the potential for long-term impacts that could arise due to differences in future development patterns on the affected site brought about by the change in zone. Unless otherwise noted, this analysis

interprets the environmental impacts that arise from the net difference in developability of the affected property, between the existing zone and the proposed zone.

Natural Environment

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

The proposed changes would result in no direct impacts, and with potential future development would have a low probability of resulting 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 site is within a seismic liquefaction hazard area mapped by the City of Seattle, where the nature of the soils results in somewhat higher than average structural damage potential during a major earthquake. This does not prevent development. Rather, it would lead to a higher degree of structural strength required by building codes to reduce the potential damage and loss of life. This hazard area represents an environmental critical area that influences structural design of future development. However, the prospect of future additional development as a result of the rezone does not substantively affect the potential for significant adverse impacts on the “earth” element of the natural environment. Disturbance by grading during future construction would be the primary type of impact, but on this relatively flat site there would be only minor potential for adverse impacts, particularly if typical erosion and sedimentation controls were implemented during construction.
- The relative proximity of the Duwamish River west of the rezone property, and the possibility that some surface stormwater runoff may make its way toward surface ditches and/or natural drainage courses, represent a potential adverse impact on water. The potential for an increased amount of future development to generate erosion and sedimentation, and the potential for uncontrolled surface runoff to wash pollutants from paved surfaces could lead to pollutant contributions to natural drainage courses. This might affect surface water quality and fisheries habitats. However, both during and after construction, regulatory measures required by the City of Seattle, and the prospect of additional environmental review and mitigation measures for future development to implement, mean that the potential for significant adverse construction and post-construction related impacts to water and fisheries is likely to be avoided. Erosion and sedimentation controls as required by the City of Seattle would likely avoid or reduce erosion into natural drainage courses. On-site drainage control systems would be required to meet standards that provide protection from water quality and storm runoff peak rates, consistent with state standards for such drainage controls.
- Toxic/hazardous substances are likely present at the site, given the history of past uses on and near the site. This presence and the potential for release with site disturbance represent a potential adverse impact. However, with required disclosure of these contaminants by future development applicants, and remediation efforts able to be required by applicable regulations and implemented accordingly, it is expected that

the site can be redeveloped and occupied by other commercial uses without significant adverse impacts. Environmental reviews of future specific development proposals would be able to identify which areas would be disturbed, what potential there is for release of toxic and hazardous substances at those locations, and what remediation efforts are required or advised in order to accommodate future construction activities. Remediation efforts may also be guided by other state or federal requirements as well.

- The site vicinity includes at least one tract of undeveloped vegetated land to the south and the Duwamish River environment to the west and south that may support wildlife presence. However, the site and its adjoining large block of land, plus other properties north and northwest of the site, are predominantly paved and unvegetated spaces and are developed with airport and aircraft manufacturing-related facilities. Given the immediate site vicinity's developed, urban character and low value for wildlife habitat, the potential for adverse plant and animal impacts is low with future development under proposed zoning.

Built Environment

Land Use, Height/Bulk/Scale

The site is located in the southernmost extent of the Duwamish industrial area within the City of Seattle, at a point where the municipal boundaries coincide with the site's western and southern boundaries. However, the existing warehouse complex spans the municipal boundaries, with one warehouse building each located in Seattle and Tukwila, and other parking and truck maneuvering areas located in both jurisdictions. According to the environmental checklist, the City of Tukwila in December 2007 approved a rezone of the adjoining block of land (32 acres) from "Heavy Industrial – Manufacturing-Industrial Center" to "Light Industrial."

Across S. Norfolk Street to the north lies King County International Airport, with a quarter-mile clear zone at the south end of the runways, aircraft maneuvering area and a few small airport-related structures in the nearest portion of the airport facility. Other aircraft manufacturing facilities lie further to the northwest and west of the rezone site vicinity on both sides of the Duwamish River.

To the south, assorted commercial buildings are located south of the Boeing Access Road in the City of Tukwila. The Boeing Access Road and East Marginal Way S. provide easy access to Interstate 5, SR 599 and other locations to the north and south. The Duwamish River meanders in this vicinity but has been bridged in a few locations to provide local access.

The existing IG2 zoning is similar to other zoning across Interstate 5 to the east, but otherwise the juxtaposition of the municipal boundaries and Interstate 5 separate this vicinity from other properties in Seattle's jurisdiction.

Within this "built environment" the proposal to rezone from IG2 to IC would remain consistent with the industrial use intent expressed for the Greater Duwamish Manufacturing & Industrial Center, because both are industrial zones. No direct adverse impacts of land use compatibility or height, bulk and scale are identified, due to the existing use patterns nearby and the retention of

an 85-foot height limit for non-industrial uses. This conclusion also relates to the relationship of the rezone site to the King County International Airport to the north.

The IC zone would provide increased flexibility for the presence of commercial uses, and this in itself would also not be a concern with respect to land use compatibility. However, the proposed IC zone would represent a relatively large increase in the density of non-industrial development possible on the site. When considering the rezone site is approximately 29 acres, the net increase in maximum development capacity, if fully utilized, could lead to an intensification of commercial and possibly industrial uses on the site. The environmental checklist estimates this could generate an estimated 3 million square feet of commercial space (and on the order of 8,000 employees) in the City of Seattle jurisdiction if fully developed according to maximum density limits. (This is an estimate of gross maximum development rather than net increase with the rezone.)

Efficient use of industrial land for permitted uses is generally interpreted as a favorable land use outcome. However, if the total amount of non-industrial commercial uses generated such a large degree of activity and congestion that it significantly interfered with freight movements or led to other adverse impacts on industrial businesses, this could be interpreted as less compatible with existing plans for the Manufacturing & Industrial Center than the current IG2 zoning. This is due to that Center's expressed preference for industrial uses rather than non-industrial uses. The presence of another 32 acres of adjoining redevelopable land in the City of Tukwila also contributes to the potential for cumulative increase in congestion and activity levels. This might be expressed primarily in increased vehicle traffic on the local road and highway network. This sort of impact would likely occur gradually over a long period of time as development occurs to infill the large amount of land available for commercial development.

Transportation

The recommended rezones would result in no direct impacts on transportation systems, but with increased levels of future development, additional amounts of traffic could be generated. If the rezone site developed to maximum capacity with non-industrial uses under the IC zone, the contribution of increased daily vehicle trips could be substantial. However, at least three factors increase the difficulty in interpreting what difference this would make on the local street network.

- One factor is the existing contributions of truck traffic to and from the site in its current use. The site likely generates considerable daily traffic activity, although it may occur at off-peak times of day.
- A second factor is interpreting the relationship to other patterns of traffic in the vicinity that likely respond to shift changes at local industrial facilities as well as economic trends affecting industrial activity levels.
- A third factor is interpreting how effective the current road network is in handling the current daily traffic patterns and speculating about future possible development patterns. This road system may have multiple peak periods rather than just a typical morning-evening peak use pattern. Also, the unusual street pattern and intersection configuration at Boeing Access Road/East Marginal Way S. appear to have both favorable and unfavorable elements in their performance and usefulness. Favorable elements include the presence of north-south arterial routes that include both Airport Way S. and East

Marginal Way S. and nearby connections to/from I-5. The relative ease of connection with SR 99 and SR 599 are also favorable. Unfavorable elements include the potential for reduced traffic efficiency at the Boeing Access Road/East Marginal Way S. due to the unusual configuration, and the potential “funneling” of much local traffic through this intersection given the scarcity of other local arterial road options.

In short, while significant amounts of new development at the rezone site may contribute to increased traffic congestion at local intersections and roadways, there is not a reliable method of predicting the worst-case future outcome for this SEPA evaluation. Available routes afforded by S. Norfolk Street and Airport Way, as well as availability of transit options, may be able to moderate traffic flows such that major traffic congestion impacts would be avoided for many years into the future. It can be speculated that eventually traffic congestion could lead to a need to adjust signal timing or make other channelization changes at the Boeing Access Road/East Marginal Way S. intersection. However, this type of mitigation would need to be evaluated for future development proposals and measured against traffic operating conditions at that time. It should also be noted that this key intersection is located in the City of Tukwila, not the City of Seattle.

For this SEPA evaluation, the conclusion is that significant adverse transportation system impacts due to the proposed rezone cannot be identified at this time, even though future additional development could add numerous additional trips to the road network. Similar to the existing condition, however, future development proposals would be subject to further environmental review, where adverse transportation impacts would be analyzed in more detail and compared to traffic conditions at the time of the development proposal. This sort of phased environmental review is recommended for this type of situation and preferable for determining whether and when specific mitigation measures should be implemented.

DECISION

[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: _____ Date: _____
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Department of Planning and Development