



City of Seattle

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Gregory J. Nickels, Mayor

**Department of Planning and Development**

D. M. Sugimura, Director

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

**Application Number:** 2401534

**Application Name:** Rico Quirindongo, DKA Architects for the Urban League of Metropolitan Seattle

**Address of Proposal:** 2300 South Massachusetts Street

**SUMMARY OF PROPOSED ACTION**

Master Use Permit to establish use to change use of an existing three-story public school (Old Colman School) to 22,000 sq. ft. museum at ground level with 36 apartment units on floors two and three. Surface parking is to be provided for 82 vehicles. Project includes interior alterations and a proposed 1,021 sq. ft. residential entry addition to the existing building providing accessibility compliance.

The following approval is required:

**SEPA – Environmental Determination - SMC Section 25.05**

**SEPA DETERMINATION:**  Exempt  DNS  MDNS  EIS

DNS with conditions

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

**BACKGROUND DATA**

**Site and Vicinity Description**

The proposal site, known as the “Old Colman School”, contains a three-story; brick faced building with a good sized paved parking area to the south. The corner site is bounded by South Massachusetts Street to the south, 23<sup>rd</sup> Avenue South to the west and a park located over the I-90 tunnel lid to the north and east. Across Massachusetts Street is the Colman Playground. Along the south and east sides of the proposal site, the topography drops down to the street grade and is mapped as having a slope of



sales and service,” and “multiple family dwelling units to the density normally allowed under LDT zoning” and “artists residences and studios”.

The Decision further states that the existing school building may include multi-family dwelling units up to the number allowed by the density limit for Lowrise 1 zoning: one unit per 1,600 square feet of site area (SMC 23.45.008 A), or 49 units, provided that the building is not designated for a single-use and that a portion of the building is devoted to a museum or cultural center. The zoning of the subject site is Lowrise Duplex/Triplex (LDT) which typically allows multifamily residential uses with a density limit of one dwelling unit per 2,000 square feet of site area (SMC 23.45.008 A). For this 78,822 square foot site, that density limit would allow 39 dwelling units. Institutions, such as museums, are permitted under LDT zoning, as long as they conform to the development standards laid out in SMC 23.45.092 through 102.

The Decision includes several special development standards intended to facilitate the re-use and preservation of the existing Colman School, DPD is authorized to waive or otherwise modify the restriction of the underlying LDT zoning as they apply to the Colman School. Limited modifications to the SUAC Report and Decision first floor use restrictions were requested by the applicant in addition to limited modification to three development standards: open space quantity, access to open space and parking quantity. The four requests are as follows:

**1. First Floor Use Restrictions:** The SUAC Report and Decision states that, “*Residential use shall be prohibited on the main entry floor of the Old Colman School Building. The main entry floor is defined as the floor access from the main monumental stairway on the east side of the building.*” The requested modification is to allow the museum and associated non-residential uses to be located on the first floor the Old Colman School Building. The residential uses would instead be located above the museum, on the second and third floors.

Since the time of the SUAC Report, greater development of the proposed program and renovation of the building has resulted in several changes that would benefit from a modification to the first floor use restrictions. First, the museum has grown in size from the originally proposed 7,000 SF to over 18,000 SF. The new program is 35% larger than the former school’s entire second floor. Second, the existing height of the gymnasium space is ideal for a multi-purpose exhibit and event space, which is essential to the economic sustainability of the museum. Finally, locating the 36 residential units on adjacent floors greatly simplifies the development of those dwellings. This arrangement also facilitates security and simplifies fire and life safety issues for a museum which would otherwise be sandwiched between two residential floors. For these reasons, the Director approves the requested modification.

**2. Quantity of Open Space:** The SUAC Report and Decision states that, “*In recognition of the location of the facility adjacent to large amounts of public open space, the Director of the Department of Design, Construction and Land Use may authorize reductions in the total amount of open space required on site. From the levels required in SMC 23.45.016 A1a (400 square feet of private open space per residential unit) and any other combined open space requirements to any level required to allow economic re-use of the building so long as*

*minimum set back requirements are maintained.*” The requested modification is to reduce the total amount of residential open space.

The Land Use Code does not contemplate open space standards for the proposed use and structure within the LDT zone. The SUAC language adopted a standard of 400 square feet per unit, which exists in a Code provision for a different zone. Since the approved SUAC applied this standard, the proposed project is subject to this requirement of 400 square feet per unit. For 36 units, the total open space requirement is 14,400 square feet. The plans include 6,394 square feet of residential common open space, which is equal to 178 square feet for each dwelling unit.

As noted in the SUAC language, the proximity of the site to the Colman Playfield and abutting park provides considerable visual and recreational opportunities for the residents to enjoy the neighborhood open space. Additionally, all of the minimum set backs are maintained. Furthermore, the landmark status of the building limits the alterations that can be made to the building and site and the economic re-use of the site is dependent on the provision of parking on site. All of these factors contribute to the justification of reduced open space requirements. Therefore, the Director approves the requested modification.

- 3. Direct Access to Open Space:** The SUAC Report and Decision states that *“The Director of the Department of Design, Construction and Land Use may authorize residential uses that do not provide direct access to private useable open space so long as such units are located in a combined mixed-use development which allocates a significant portion of the first floor of the building to community serving non-residential uses which is defined for the purposes of this provision as: community center, museum, public or private school classes, non-profit social service agencies directly tied to a use in the building, or small scale neighborhood serving retail use.”* The requested modification is to authorize residential uses that do not provide direct access to private useable open space.

The proposal satisfies all of the SUAC conditions listed above, except for the allocation of first floor space to community serving non-residential uses. Instead, the community serving non-residential use has been located on the ground floor. See the discussion of modification request #1 above. Given the restraints of preserving and renovating a landmark structure and site, the proposed modification is eminently reasonable to accommodate the proposed program contemplated by the SUAC. Therefore, the Director approves the requested modification.

- 4. Total Amount of Parking Required:** The SUAC Report and Decision states that *“In the event that a joint use agreement can not be reached between the developer of the site and the City of Seattle for a joint use agreement for the adjacent State-owned City leased parking lot, the Director of the City of Seattle Department of Design, Construction and Land Use shall be authorized to permit uses that provide less than the amount of on-site parking required by the land use code to whatever minimum level that does not result in a parking situation that meets or exceeds that which would normally trigger initiation of a residential parking zone.”* The requested modification is to authorize a reduced amount of total parking spaces as allowed by the SUAC.

The Land Use Code requires 89 spaces and the proposed project includes 82 spaces located on site. On-site parking has been provided to the maximum amount possible, given the existing physical site constraints. While a Joint Use Agreement has not been put in place between the Urban League of Metropolitan Seattle (the Owner of the site) and City of Seattle, the adjacent Seattle Parks and Recreation property will include 66-85 parking spaces available for use by the general public and will be accessible from the site via a shared use vehicular entry. Given the availability of the abutting parking lot and the SEPA parking analysis discussed later in this report, the amount of parking proposed on site is approved by the Director.

### Public Comment

The SEPA proscribed comment period ran from May 5, 2005 to May 18, 2005. Two comments were received. The following issues were raised:

- Clarification of the project applicant;
- Clarification of the proposed uses within the existing structure;
- Object to the re-use of a school into residential units;
- Clarification of the landmark status;
- Concern that inadequate parking is being provided;
- Question whether security will be problematic between the proposed museum and residential uses; and
- Concern that efforts to ruin the proposed museum have resulted in the proposed residential uses at this site.

It should be noted that the SUAC held three public meetings on the proposed changes to the use and development standards each of which included a period for public comment and questions. Comments received at all of the meetings are evidenced in the summaries found attached to the Department of Neighborhoods report.

### ANALYSIS – SEPA

The initial disclosure of the potential impacts from this project was made in the environmental checklist submitted by the applicant dated April 6, 2005, and annotated by this Department. The information in the checklist, supplemental information provided by the applicant (Report for the designation from the City Office of Historic Preservation, geo-tech reports, project plans), comments from members of the community, and the experience of the lead agency with review of similar projects form the basis for this analysis and decision.

The SEPA Overview Policy (SMC 25.05.665) establishes the relationship between codes, policies, and environmental review. Specific policies for specific elements of the environment, certain neighborhood plans, and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority. The Overview Policy states in part: “where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation (subject to some limitations).”

Under certain limitations/circumstances (SMC 25.05.665 D 1-7) mitigation can be considered. Thus, a more detailed discussion of some of the impacts is appropriate.

Short-Term Impacts

The following temporary or construction-related impacts are expected: decreased air quality due to suspended particulates from building activities and hydrocarbon emissions from construction vehicles and equipment; increased dust caused by construction activities; potential soil erosion and potential disturbance to subsurface soils during grading, excavation, and general site work; increased traffic and demand for parking from construction equipment and personnel; conflict with normal pedestrian movement adjacent to the site; increased noise; and consumption of renewable and non-renewable resources. Due to the temporary nature and limited scope of these impacts, they are not considered significant (SMC 25.05.794). Although not significant, these impacts are adverse, and in some cases, mitigation is warranted.

Several adopted City codes and/or ordinances provide mitigation for some of the identified impacts. Specifically, these are: Stormwater, Grading and Drainage Control Code (grading, site excavation and control of soil erosion through use of best management practices); Street Use Ordinance (watering streets to suppress dust, removal of debris, and obstruction of the pedestrian right-of-way); Building Code (construction measures in general); and the Noise Ordinance (construction noise). Compliance with these applicable codes and ordinances will reduce or eliminate short-term impacts to the environment and they will be sufficient without conditioning pursuant to SEPA policies.

Long-Term Impacts

Long-term or use related impacts are also anticipated from the proposal and include: increased surface water runoff from greater site coverage by impervious surfaces; potentially decreased water quality in surrounding watersheds; increased ambient noise due to increased human activity; increased demand on public services and utilities; increased light and glare; increased energy consumption; increased on-street parking demand and increased vehicle congestion. These long-term impacts are not considered significant because they are minor in scope.

Notwithstanding the determination of non-significance, the following impacts merit more detailed discussion.

Environmental Element	Point of Discussion
1. Parking	<ul style="list-style-type: none"> <li>• Increase in parking from proposed development.</li> </ul>
2. Traffic	<ul style="list-style-type: none"> <li>• Increase in traffic from proposed development.</li> </ul>
3. Historic Preservation	<ul style="list-style-type: none"> <li>• Renovation of 1909 landmark structure.</li> </ul>
4. Critical Areas	<ul style="list-style-type: none"> <li>• Steep slopes located on site.</li> </ul>

Parking

The existing site contains zero parking spaces. The proposed development includes 82 parking spaces to be provided on a surface parking lot located on-site to the south of the existing structure. The Parks

Department is also in the process of developing a surface parking lot on the site immediately to the east of the subject site. This new parking lot will contain 60-85 parking stalls to be used by both Parks patrons as well as the redevelopment of the Colman School. Using the Third Edition of the Institute of Traffic Engineers Parking Generation Manual, parking generation rates associated with Low/Mid Rise Apartment use was used to estimate the residential parking demand associated with the proposal. Information provided by the applicant served as the basis for calculating the estimated parking demand for the proposed museum use associated with the proposal.

The 22,000 square foot museum use is required by the Seattle Land Use Code to have 56 parking spaces. The Parking Demand Analysis suggests that the museum use associated with the proposed project would require approximately 63 parking spaces during the peak hour likely to occur at midday. This estimate is based on a daily projection of 250 visitors at the busiest season. A conservative approximation would be to assume that all 250 visitors will be at the museum at the same time (rather than staggered), that there is likely to be an average of two visitors per vehicle (resulting in 125 vehicles) and that 50% of these visitors will be present during the peak hours. The reality is that the museum program intends to attract school groups and families to the site, so the visitor count per vehicle is likely to be much higher. Finally, assuming 50% of the 125 vehicles are present at the museum during peak hours, then the peak parking demand for the museum use is 63 cars.

The 36 proposed residential units would require approximately 36 spaces during the peak hours likely between late evening and early morning. The 36 residential units are required by the Seattle Land Use Code to have 33 parking spaces, all of which will be designated as such.

The difference of 17 parking spaces between the estimated parking demand of 99 spaces and the 82 parking spaces being provided is unlikely to create adverse parking strain on the surrounding streets for several reasons. First, the parking demands for the residential and museum uses are likely to occur at different peak hours and therefore are not additive and are not expected to conflict with one another. Nearly all of the residential parking is likely to be accommodated on site during the peak hours. Additionally, the ITE data for the residential use tends to have higher parking demand rates due to the lack of public transportation. Given the urban location of the subject site and availability of transit service, the actual parking demand is likely to be less. Finally, numerous studies of car ownership show lower rates for lower-income households. Given that the proposed housing units are designated for low-income households, the residential numbers given above are a conservative estimate.

The highest parking demands would be expected during an evening rental of the museum for a private function, a time when residential parking demand would also be high. During these evening hours, however, it is not anticipated that the Parks parking lot would be utilized and would therefore likely be fully available for parking.

Therefore, the estimated parking demand generated by the proposed project is not considered adverse and the parking impacts require no further mitigation.

### Traffic

The vehicular traffic generated by the project will be both residential and museum-related and will likely peak during the weekday PM hours and weekday midday and weekend day

respectively. It is anticipated that the PM peak hours will be affected primarily by the residential uses proposed on the site. Given the low number of residential units proposed (36), the decreased car ownership rates typical of low-income residential uses and the availability of transit in the area, the estimated increase in trips during the PM peak hours is not considered a significant impact. Therefore, no mitigation measures or conditioning pursuant to the SMC Chapter 25.05, the SEPA Ordinance is warranted.

### Historic Preservation

The original Colman School was constructed in 1909 and a gymnasium wing was added in 1940. Based on the review of the information submitted by the applicant, the existing building was designated a Seattle Historic Landmark on August 17, 2005 by the Seattle Landmarks Preservation Board. The original building, designed by Seattle School District Architect James Stephen, functioned as a school from 1910 to 1985. The Preservation Board determined that the structure was historically significant based on the noteworthy context of the Rainier Valley and Mt. Baker neighborhoods, the notable Jacobean style architecture, as well as the history of the Seattle School District and building architect.

An application to agree upon Controls and Incentives regarding proposed modifications to the structure was made to the Department of Neighborhoods on August 20, 2005. Compliance with SEPA historic preservation policies for this proposal should be considered complete. Therefore, no further conditioning is warranted.

### Environmentally Critical Areas

As noted in the site description, mapped environmentally steep slope and potential slide critical areas, are found on the site along the west and south property lines. The ECA codes of Seattle generally prohibit disturbance areas with slopes greater than 40%. However, an exemption from the critical area standards was granted under project #2502856 where a finding was made that the steep slopes were created as a result of right-of-way improvements.

The subject property is considered to be 'potential slide area' due to the on site 'steep slopes' and future developments at this parcel will be regulated as such through the Stormwater, Grading and Drainage Control Code and the Seattle Building Code. Existing development standards and BMP requirements will be sufficient to mitigate impacts and no SEPA conditioning, is deemed necessary.

### Other Impacts

Several adopted Codes and Ordinances and other agencies will appropriately mitigate the other use-related adverse impacts created by the proposal. Specifically, these are the Puget Sound Clean Air Agency (increased airborne emissions); and the Seattle Energy Code (long-term energy consumption).

The other impacts not noted here as mitigated by codes, ordinances, or conditions (increased ambient noise; increased pedestrian traffic; increased demand on public services and utilities) are not sufficiently adverse to warrant further mitigation by conditions.

**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 requirement of the State Environmental Policy Act (RCW 43.21.C), including the requirement to inform the public of agency decisions pursuant to SEPA.

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

Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030(2)(C).

**CONDITIONS – SEPA**

*Non-appealable condition*

1. Prior to Building Permit Issuance, an access easement between the subject property owner, the Urban League of Metropolitan Seattle and the abutting property owners, WSDOT and the Seattle Department of Parks and Recreation shall be secured from the driveway off of South Massachusetts Street.

Signature: (signature on file) Date: April 17, 2006

Lisa Rutzick, Land Use Planner  
Department of Planning and Development  
Land Use Services