



City of Seattle

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**

Project Number: 3003527, 3003528

Applicant Name: Terry McCann, Huckell/Weinman Associates, Inc.
For Seattle Steam Company

Address of Proposal: 1319 and 1318 Western Ave

SUMMARY OF PROPOSED ACTIONS

3003527 – 1319 Western Ave:

Master Use Permit for future construction of a 1,260 sq.ft. addition to utility service structure, including a 200' smokestack, installation of new boiler and interior remodel (Seattle Steam Company). One existing smokestack and boiler to be removed.

3003528 – 1318 Western Ave

Master Use Permit for future construction of a 13,450 sq.ft., two-story utility service structure. Existing underground tank to be altered. Parking for one vehicle will be provided.

The following approvals are required:

- **SEPA – Environmental Determination**, SMC Chapter [25.05](#);
- **Administrative Conditional Use (ACU)** for rooftop features higher than 50' above the structure roof, SMC [23.49.008 C4](#) (project #3003527)
- **Variances** to exceed the max. curbcut and driveway width, SMC [23.54.030 D2a & F2b](#). (project 3003528).

SEPA DETERMINATION:

Exempt DNS¹ MDNS EIS

DNS with conditions

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

¹ Early DNS published December 8, 2005.

BACKGROUND DATA

Project Description

Seattle Steam proposes replacement of an existing boiler and stack on the steam plant site (1319 Western Ave), removal of an existing underground fuel storage tank and construction of a new fuel handling and storage building, with vehicle ingress and egress from Western Ave (1318 Western Ave).

The development program would facilitate the delivery and handling of reclaimed waste wood for steam production. The wood fuel would partially replace the utility's current use of fossil fuels.

As proposed, the fuel handling station requires variance review for wider curbcuts and driveways, and the replaced smokestack requires Administrative Conditional Use review for increased height.

Vicinity and Site

The project is located on two sites, on both sides of Western Ave, in an area of downtown called “West Edge”. 1319 Western Ave is located on the southwest side of Western, midblock between Union and University Streets. 1318 Western Ave is located on the eastern corner of Western and Union.

1319 Western is bounded by Western Ave to the northeast and the Alaskan Way Viaduct to the southwest. 1318 Western is bounded by Western to the southwest and Union St to the northwest. Western is a minor arterial at the site, the Viaduct is an elevated state highway, and Union is a nonarterial. The sites and vicinity slope down to the southwest (see Figure 1).

Both sites are zoned Downtown Mixed Commercial with a 160-foot base height limit (DMC-160, see Figure 2). The property directly northeast of the 1318 site, as well as vicinity properties to the south of Union Street, to the west of Western Ave, and to the east of Alaskan Way are also zoned DMC 160. Across Post alley to the northeast, the height limit for the DMC zone increases to 240 feet. To the southeast of the sites, the Harbor

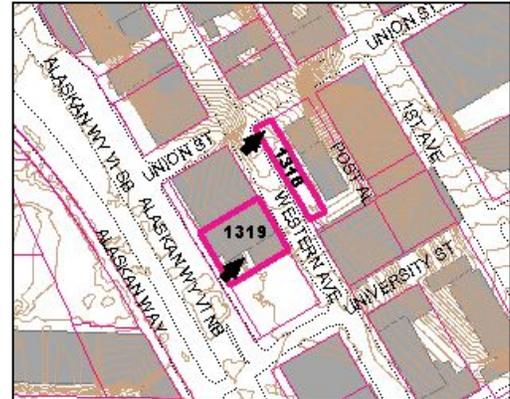


Figure 1. Local topography

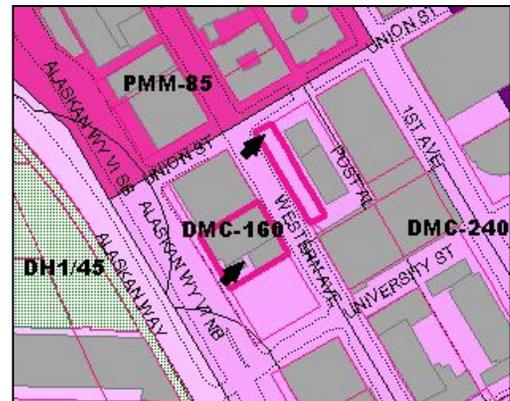


Figure 2. Vicinity zoning



Figure 3. Aerial View

Steps development is also zoned DMC 240, subject to a contract rezone adopted by ordinance [111623](#). To the north of Union St, land is zoned Pike Market Mixed with an 85-foot base height limit (PMM-85). The sites are located in the Commercial Core Urban Center Village, and neither proposal is located in a shoreline environment.

Development in the vicinity includes highrise mixed use residential buildings, office buildings, a self-storage warehouse, retail, restaurants, a youth hostel, the Viaduct, and surface and structured parking. Adjacent to the 1318 site to the northeast, Seattle City Light operates an electrical substation. Further uphill across Post Alley, a new [hotel/condominium tower](#) by Four Seasons (MUP #[2407081](#)) is proposed, which includes a stairway along Union, connecting First Avenue to Western. Across Union St from the 1318 site is the historic [US Immigration Building](#), designated as a City, state, and [national landmark](#). The site is located within a 200' "meander line buffer" in proximity to the original shoreline.

1319 Western is a rectangular site, approximately 120' wide by 134' deep, or about 16,100 square feet, with its shorter dimension along Western Ave. The site is entirely developed and occupied by the steam plant, which has operated since 1902. Seattle Steam currently provides steam to approximately 175 buildings downtown, including hotels and office buildings, as well as Swedish, Harborview, and Virginia Mason Medical Centers on First Hill. The existing steam plant contains about 19,660 sq.ft. of floor area, and four natural gas and oil-fired boilers with supporting equipment. The entire site is designated as an Environmentally Critical Area (ECA) due to potential earthquake liquefaction.

1318 Western has a longer frontage and is relatively shallow (approximately 210' by 34', or 7,200 sq.ft). The site is developed with a small shed and a 252,000-gallon below-grade fuel oil storage tank. The site slopes down to the southeast, about 14' in all (See Figure 1), and is adjacent to a larger steep slope system that meets City criteria as an ECA, subject to exemption from ECA steep slope standards, per SMC [25.09.180 D1](#).

The two sites are connected by an existing utility tunnel beneath Western Ave, authorized for use by Seattle Steam by ordinance [121067](#).

There is no substantial vegetation on either site. There are no required dedications to adjacent streets. According to SMC [23.49.022](#), finished sidewalks must be at least 12' wide, which accommodates full improvements including street trees.

The sites are served by public transit.

PUBLIC COMMENT

DPD received two messages from one neighbor and two letters from the legal representative of a neighboring business. Comments related to cumulative impacts of construction in the vicinity on pedestrian access, light and glare, noise levels, and air quality. Comments also related to the projects' possible long-term effects on air quality, noise, view blockage, soil contamination, and earthquake safety. DPD received a request for interpretation, concerning whether the proposed fuel distribution building is appropriately categorized as a utility service use.

ANALYSIS -- VARIANCES

The proposed fuel handling facility (MUP #3003528) is subject to two variances, to exceed the standard width for driveways and curbcuts, per SMC [23.54.030 D2a & F2b](#).

Variances may be authorized only when all of the variance criteria set forth at SMC Section [23.40.020](#) and quoted below are met.

- 1. Because of unusual conditions applicable to the subject property, including size, shape, topography, location or surroundings, which were not created by the owner or applicant, the strict application of this Land Use Code would deprive the property of rights and privileges enjoyed by other properties in the same zone or vicinity;**

The site at 1318 Western Ave is part of a larger development devoted to the production of steam for various buildings in Downtown and First Hill. Updated heating technologies allow for use of alternative fuels, such as wood chips. Delivery of the wood chips must necessarily be by truck, and delivery trucks must be of a scale to satisfy the programmatic demands of the steam plant. In the context of the surrounding vicinity, DPD considers such access by large trucks to be a privilege enjoyed by other properties in the vicinity.

The site is unusually small and narrow in comparison to other lots in the zone and vicinity: 210' x 34.5'. Sidewalk width standards serve to narrow the developable area further, as the proposed structure must step back two feet (2') in order to provide for a wider sidewalk on Western. The vicinity to the east of the site is steeply sloped, such that the Union Street roadway is interrupted between Post Alley and First Avenue. A public stairway is proposed on the south side of Union Street as part of the Four Seasons Hotel project. The stairway's bottom landing is located midway along the site's north lot line on Union Street. The site is therefore not accessible from the north, and trucks can access the site from Western Ave only.

The owners and applicants have not created the described unusual conditions.

Strict application of development standards would require that the development provide no more than two one-way driveways and two associated curbcuts, each with a maximum width of 15'. Strict adherence to these standards would preclude access to the site by large trucks.

For both variances, the application satisfies the first criterion.

- 2. The requested variance does not go beyond the minimum necessary to afford relief and does not constitute a grant of special privilege inconsistent with the limitations upon other properties in the vicinity and zone in which the subject property is located;**

The applicant has submitted diagrams of alternative access configurations, considering trucks of varying sizes measured according to their wheel base. The described program accounts for several parameters, including required daily fuel volumes, projected delivery intervals, and Seattle Department of Transportation (SDoT) limits on downtown peak-hour truck traffic. Based on this analysis, trucks with a 62' wheel base are required for effective fuelling of the wood-fired boiler.

Further, the applicant concludes that truck length is not the primary factor driving the need for wider accesses on this site. Truck width – paired with the site’s unusual conditions – is the primary determining factor. Truck widths are relatively standard, regardless of their wheel base. The proposed driveway and curbcut widths are the minimum necessary to facilitate safe and effective truck access to the site, as documented in the application materials.

Truck access to the site does not constitute a grant of special privilege, as truck loading is a common feature of many downtown developments.

For both variances, the application satisfies the second criterion.

3. The granting of the variance will not be materially detrimental to the public welfare or injurious to the property or improvements in the zone or vicinity in which the subject property is located;

Driveway and curbcut widths are generally limited in order to minimize potential for pedestrian-vehicle conflicts. This project’s proposed wider driveways and curbcuts are intended to serve a limited number of trucks, which will access the site during nighttime hours when pedestrian activity is generally low. The proposed accesses are designed to facilitate one-way traffic, south to north, with all maneuvering to occur inside the enclosed structure.

Considering the low traffic volume generated by the site, the timing of truck trips, and that maneuvering is to occur entirely on site, DPD determines that the requested variances are unlikely to result in detriment or injury.

The wider curbcuts would modify on-street parking and would displace roughly two more cars than would otherwise be eliminated by conforming curbcuts. While on-street parking is in demand, DPD determines the reduction to be minor in consideration of the number of nearby metered public parking spaces and ample private parking lots in the vicinity.

For both variances, the application satisfies the third criterion.

4. The literal interpretation and strict application of the applicable provisions or requirements of this Land Use Code would cause undue hardship or practical difficulties;

The literal interpretation and strict application of applicable mixed use standards would cause practical difficulties for the property owners. Standard curbcuts would severely limit the scale of delivery vehicles to the site, effectively preventing the proposed fuel conversion from occurring.

For both variances, the application satisfies the fourth criterion.

5. The requested variance would be consistent with the spirit and purpose of the Land Use Code regulations for the area.

The requested curbcuts and driveways are consistent with the spirit and purpose of the regulations for the DMC zone and with the character of the neighborhood, which contains a variety of commercial, retail, and office uses and structures in addition to the long-established Seattle Steam facility. Considering that most of the proposed deliveries would occur at night, the proposed variances have a marginal effect on the pedestrian environment while allowing effective delivery of an appropriate fuel to the site, in support of the overall utility services provided by Seattle Steam Company.

For both variances, the application satisfies the fifth criterion.

DECISION – VARIANCES

DPD **APPROVES** the requested variance to allow two curbcuts wider than 15'.

DPD **APPROVES** the requested variance to allow two driveways wider than 15'.

ANALYSIS – ADMINISTRATIVE CONDITIONAL USE

In downtown zones, rooftop features that extend higher than 50' above the structure's roof may be permitted as a conditional use, per SMC [23.49.008 C4](#). The proposal includes the replacement of an existing smokestack with a new stack (MUP #3003527). The new stack would be approximately 25' taller than the existing stack, and would extend about 140' above the roof of the existing steam plant. While the proposed stack would be lower than the maximum height of the zone, it nevertheless is higher than the allowed 50' above the existing steam plant's rooftop.

General criteria for conditional use in DMC zones, SMC 23.49.122 A:

- 1. The use shall be determined not to be materially detrimental to the public welfare or injurious to property in the zone or vicinity in which the property is located.*
- 2. In authorizing a conditional use, adverse negative impacts may be mitigated by imposing requirements of conditions deemed necessary for the protection of other properties in the zone or vicinity and the public interest. The Director or Council shall deny the conditional use, if it is determined that the negative impacts cannot be mitigated satisfactorily.*

The utility use has existed continuously on the site for roughly a century, supplying steam to various downtown clients. The proposed new stack represents a transition to a new fuel source and does not constitute a change in the principal use of the site. Application materials document results of air quality models, which show that the proposed higher stack is appropriate for burning of the new fuel (recovered woodchips). This conclusion is subject to approval by the Puget Sound Clean Air Agency (PSCAA) as part of its Notice of Construction review. DPD staff has discussed the project with PSCAA staff, who appeared to be confident that dispersion modeling conducted by Geomatrix (an environmental science consultant) should demonstrate that a 200'-high stack is appropriate for the defined task. Since the proposed fuel conversion is allowed subject to such approval, DPD considers that Seattle Steam's proposed stack does not constitute an adverse air quality impact affecting the public welfare or nearby properties.

The proposed stack is about 8.5' in diameter, compared to the existing stack diameter of about 10'. While the proposed stack will be about 25' taller, it would result in a narrower profile. Seen in profile and without accounting for perspective, the new stack represents a marginal overall increase in bulk of about 32 sq.ft.

Based on the analyses and the experience of the Department, the proposed new stack will not be materially detrimental to the public welfare, nor will it be injurious to the property or vicinity. The project represents a continuation of an existing and long-established use, it must comply with air quality standards administered by the PSCAA, and it does not result in a substantial increase in building bulk.

Criteria specific to rooftop features higher than 50' above the rooftop, SMC [23.49.008 C4](#):

The request for additional height shall be evaluated on the basis of public benefits provided, the possible impacts of the additional height, consistency with the City's land use policies, and the following specific criteria:

- a. The feature shall be compatible with and not adversely affect the downtown skyline.*
- b. The feature shall not have a substantial adverse effect upon the light, air, solar and visual access of properties within a three hundred (300) foot radius.*
- c. The feature, supporting structure and structure below shall be compatible in design elements such as bulk, profile, color and materials.*
- d. The increased size is necessary for the successful physical function of the feature, except for religious symbols.*

According to application documents, Seattle Steam's intent is a 50% reduction in natural gas consumption by converting to recovered wood fuel. Examples of recovered wood include wood from pallets and crate materials, shredded wood from land clearing, and trimmings from cabinet shops and sawmills. Anticipated public benefits include:

- A more effective use of a renewable resource,
- A reduction in the amount of wood debris sent to landfills,
- An estimated annual reduction in greenhouse emissions by 52,700 metric tonnes of carbon dioxide, assuming zero net emissions from combustion of wood waste,
- Installation of Best Available Technology associated with the new boiler and stack to ensure compliance with air quality standards,
- Lower energy costs to Seattle Steam customers.

The additional height would not itself cause any adverse air impacts, but would more likely facilitate improved dispersion of emissions. While the new 25'-high increment would occupy about 1,400 cubic feet, the entire replacement stack would represent an overall volumetric *decrease* of about 1,200 cubic feet.

With regard to Downtown land use policies, Seattle's Comprehensive Plan refers to the [Downtown Urban Center Neighborhood Plan](#). Downtown Policy LU-2 specifically addresses questions of structure height: "*The height of new development shall be regulated to: 1) communicate the intensity and character of development in different parts of downtown; 2) protect the light, air and human scale qualities of the street environment in areas of distinctive physical and/or historic character; and 3) provide transition to the edges of downtown to complement the physical form, features and landmarks of the areas surrounding downtown.*" The proposed stack does not contravene the identified land use policy.

The proposed stack would replace an existing stack, which is a recognizable and well-established feature of the downtown skyline. The proposed stack would be located in approximately the same location as the existing stack. Another historic stack also owned by Seattle Steam is located seven blocks to the southeast in Pioneer Square, at 619 Post Ave. Downtown Mixed Commercial zoning allows for building heights that exceed the height of the proposed stack – seen in this light, it is the relatively low position of the existing rooftop that occasions ACU review. Considering these factors, the proposed stack would be compatible with and would not adversely affect the downtown skyline.

The proposed increase in stack height is 25', an increase in about 14% measured from ground level. Seen in profile and without accounting for perspective, the new stack represents a marginal overall increase in bulk of about 32 sq.ft., a difference of 3% over the existing stack. The applicant submitted images of a three-dimensional model inserted into site and vicinity photos. The montage demonstrates that the replacement stack would have no adverse impact on views toward Elliott Bay, Puget Sound, or the Olympic Mountains. As such, it would not constitute an adverse impact on nearby properties for any of the concerns specified: light, air, solar and visual access.

The proposed replacement stack would be compatible with the existing Seattle Steam Plant building in terms of design elements. It is anticipated that the replacement stack would be made of carbon steel and the color of the replacement stack would be black or silver.

As documented by the applicant, the replacement stack is necessary for the conversion to the plant's proposed new fuel, and the proposed height is considered through air quality analysis to be the minimum necessary to achieve an appropriate level of dispersion.

DPD determines that the proposed smokestack is permissible as proposed, and no further mitigation is warranted.

DECISION - ADMINISTRATIVE CONDITIONAL USE

DPD **APPROVES** the request for an Administrative Conditional Use Permit for increased height of a rooftop feature.

ANALYSIS – SEPA

DPD requires a State Environmental Policy Act (SEPA) analysis for a nonresidential development of more than 4,000 square feet in a downtown zone, according to Director’s Rule [23-2000](#) and SMC [25.05.800 A2c\(ii\)](#). The applicant provided the initial disclosure of this development’s potential impacts in an environmental checklist signed and dated November 8, 2005. Several supplementary documents accompanied the checklist. DPD received four letters, from a neighbor and from legal counsel of a neighboring business. Letters identified concerns related to construction and development impacts on pedestrian circulation and safety, air quality, noise, view blockage, soil contamination, and earthquake safety. The applicant responded to these concerns in a letter to DPD dated January 23, 2006. DPD has consulted with staff at the Puget Sound Clean Air Agency (PSCAA), Seattle Department of Transportation (SDoT), and Seattle City Light (SCL). This information and the experience of the lead agency in similar situations form the basis for this analysis and decision. This report anticipates short- and long-term adverse impacts from the proposal.

Short-term Impacts

The following temporary or construction-related impacts are expected: decreased air quality due to increased dust and other suspended air particulates during construction; potential soil erosion during excavation and general site work; increased runoff; tracking of mud onto adjacent streets by construction vehicles; increased demand on traffic and parking from construction equipment and personnel; conflict with normal pedestrian and vehicular movement adjacent to the sites; 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 Section [25.05.794](#)). Although not significant, these impacts are adverse.

The SEPA Overview Policy (SMC [25.05.665 D](#)) states, “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 limitations. Several adopted City codes and/or ordinances provide mitigation for some of the identified impacts. Specifically these are: the Stormwater, Grading and Drainage Control Code, SMC [22.800](#) (grading, site excavation and soil erosion); Street Use Ordinance (watering streets to suppress dust, obstruction of the rights-of-way during construction, construction along the street right-of-way, and sidewalk repair); Building Code (construction standards); and Noise Ordinance (construction noise). Compliance with these codes and ordinances will be adequate to achieve sufficient mitigation of most potential adverse impacts. Mitigation pursuant to SEPA is therefore generally not necessary for these impacts. However, more detailed discussion of some of these impacts is appropriate.

Air and environmental health. The applicant has noted that the existing stack to be replaced contains asbestos, which could be released into the air during demolition. The [Puget Sound Clean Air Agency](#), the Washington Department of Labor and Industry, and EPA regulations provide for the safe removal and disposal of asbestos. In addition, federal law requires the filing of a demolition permit with PSCAA prior to demolition. Pursuant to SMC Sections [25.05.675 A](#) and [E](#), to mitigate potential adverse air quality and environmental health impacts, project approval will be conditioned upon submission of a copy of the PSCAA “notice of intent to

demolish” prior to issuance of a DPD demolition permit (condition #1). So conditioned, the project’s anticipated adverse air and environmental health impacts will be adequately mitigated.

The applicant has stated that environmental analysis of the site appears to indicate the presence of hydrocarbon contaminants in soils on the 1318 Western site, likely the result of relatively viscous bunker C fuel oil leaking from the existing underground oil tank. State law provides for the cleanup and appropriate disposal of hazardous substances. The Model Toxics Control Act (WAC [173-340](#)) is administered by the Washington Department of Ecology (DoE) and establishes processes and standards to identify, investigate, and clean up facilities where hazardous substances have come to be located. DPD has alerted the applicant to this law and provided a contact.

Discharge of contaminated groundwater to the sewage system is regulated by the King County Department of Natural Resources under Public Rule [PUT 8-14](#). A [factsheet](#) and permit application is available online or by calling (206) 263-3000.

Disposal of contaminated fill is regulated by the City/County Health Department.

Existing regulations adequately address potential impacts to environmental health. No further conditioning of site cleanup or hazardous waste treatment is warranted pursuant to SEPA policies.

Construction noise. Noise associated with construction of the fuel storage and handling structure, and installation of the replacement boiler and stack are not likely to adversely affect surrounding uses in the area, which include residential uses. The project sites are close to the Alaskan Way Viaduct, which is itself a source of considerable background noise. Relative to other downtown construction projects, this proposal is low and is necessarily of short duration. DPD finds the limitations of the Noise Ordinance to be adequate mitigation of potential noise impacts.

Parking. The sites abut both sides of Western Ave, and the 1319 site abuts surface parking located underneath the Alaskan Way Viaduct. SMC [25.05.675 M2b\(i\)](#) specifies, “No SEPA authority is provided to mitigate the impact of development on parking availability in the downtown zones”. DPD has identified no short-term parking impacts related to construction.

Construction vehicles. Existing City code (SMC [11.62](#)) requires truck activities to use arterial streets to every extent possible. The subject sites abut Western Ave, and traffic impacts resulting from the truck traffic associated with grading and construction will be of short duration and mitigated in part by enforcement of SMC [11.62](#). This immediate area is subject to traffic congestion during the PM peak hours, and large trucks turning onto arterial streets would further exacerbate the flow of traffic. Pursuant to SMC [25.05.675 B](#) (Construction Impacts Policy) and SMC [25.05.675 R](#) (Traffic and Transportation) additional mitigation is warranted.

The construction activities will require the removal of material from the 1318 Western site and can be expected to generate truck trips to and from the site. In addition, delivery of building materials to the sites will generate truck trips. As a result of these truck trips,

an adverse impact to existing traffic will be introduced to the surrounding street system, which is unmitigated by existing codes and regulations.

For the duration of the grading activity, the applicant(s) and/or responsible party(ies) shall cause grading truck trips to cease during the hours between 4 PM and 6 PM on weekdays. This condition will assure that truck trips do not interfere with daily PM peak traffic in the vicinity (Condition #3). As conditioned, this impact is sufficiently mitigated in conjunction with enforcement of the provisions of SMC [11.62](#).

City code (SMC [11.74](#)) provides that material hauled in trucks not be spilled during transport. The City requires that a minimum of one foot of “freeboard” (area from level of material to the top of the truck container) be provided in loaded uncovered trucks which minimize the amount of spilled material and dust from the truck bed en route to or from a site. No further conditioning of the grading/excavation element of the project is warranted pursuant to SEPA policies.

Other short-term impacts not noted here as mitigated by codes, ordinances or conditions (e.g. increased use of energy and natural resources) are not sufficiently adverse to warrant further mitigation.

Long-term Impacts

Long-term or use-related impacts are also anticipated from the proposal: increased bulk and scale on the sites; increased truck traffic and decreased on-street parking supply; changes in the quantity and nature of airborne emissions, ambient noise resulting from additional traffic and on-site mechanical systems; and increased demand on public services.

The likely long-term impacts are typical of this scale of downtown development, and DPD expects them to be mitigated by the City’s adopted codes and/or ordinances (together with fulfillment of Seattle Department of Transportation requirements). Specifically these are: the Land Use Code (aesthetic impacts, height, bulk & scale) the Seattle Energy Code (long-term energy consumption), and the street use ordinance. However, more detailed discussion of some of these impacts is appropriate.

Air quality. The submitted environmental checklist discusses the replaced boiler and smokestack and the partial conversion from petroleum-based fuels to recovered wood fuels. The applicant also submitted a brief analysis of stack emissions conducted by Ken Richmond of Geomatrix and dated January 20, 2006. DPD staff has also discussed the project with PSCAA officials, who have communicated a level of confidence in the quality of the applicant’s models, and a general assurance that the proposed boiler and stack can achieve appropriate air emissions levels through PSCAA’s Notice of Construction review. DPD therefore conditions its approval on PSCAA approval through the Notice of Construction process (condition #2). So conditioned, DPD concludes that Seattle Steam’s proposed stack does not constitute an adverse air quality impact.

Parking. SMC [25.05.675 M2b\(i\)](#) specifies, “No SEPA authority is provided to mitigate the impact of development on parking availability in the downtown zones” The project provides its

Code-required minimum parking, and DPD has identified no long-term parking impacts generated by the project.

Traffic. The applicant submitted on November 8, 2005, information related to truck traffic and vehicle maneuvering. The traffic analysis anticipates the overall traffic generated by the project, considered in the context of development in the vicinity and development currently occupying the sites. The study is supplemented with discussion and diagrams of alternatives for vehicle maneuvering and appropriate routing of wood delivery trucks.

The proposal involves roughly twenty deliveries of wood fuel per day. DPD determines that the net increase in vehicle trips is small and does not constitute an impact warranting further mitigation. Proposed maneuvering is efficient and safe, and no conditioning of the traffic element of the project is therefore warranted pursuant to SEPA policies.

Historic and cultural preservation. The applicant submitted to the Department of Neighborhoods (DoN) a historic analysis of the existing Seattle Steam facility and of surrounding structures, focused primarily on the US Immigration Building, a designated landmark located across Union St from the proposed fuel handling facility. DoN staffs have indicated that the project is appropriately designed to address this adjacency.

Submitted research also indicates it is improbable that significant archeological resources would be discovered during proposed excavations. However, the site is close to the original shoreline, there is a possibility that unknown resources could be discovered during excavation. Therefore, consistent with DPD Director's Rule [2-98](#) on SEPA Environmental Review and Archaeological Resources, and in order to ensure no adverse impact would occur to an inadvertently discovered archaeological significant resource, DPD conditions the project in accordance with the Director's Rule (condition #4).

Noise. Submitted documents discuss potential noise sources associated with the operation of the proposed fuel handling facility. Likely noise generators include fuel-wood delivery trucks (accelerating, idling, braking, and maneuvering) and mechanical systems (ventilation and cooling).

Application materials demonstrate that the proposed design facilitates truck maneuvering entirely within the structure, allowing Seattle Steam to contain most vehicle noise within an enclosed space. The application further demonstrates that the proposed facility would be able to import its daily fuel supply through a defined – relatively low – number of truck deliveries, which are to be distributed evenly over the course of a typical evening and night. Judging from the figures presented, it appears that prolonged periods of truck idling on City streets are unlikely. DPD therefore determines that no conditioning of vehicle noise is warranted. The project includes installation of rooftop cooling towers accessory to the Four Seasons Hotel, currently under construction. DPD considers rooftop mechanical systems to be common appurtenances to downtown development. DPD has reviewed a noise analysis conducted by Geomatrix and dated November 7, 2008, and concludes that no further noise mitigation is necessary.

The other impacts not noted here as mitigated by codes, ordinances, or conditions (increased demand on public services and utilities, loss of vegetation) are not sufficiently adverse to warrant conditioning.

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 [43.21C](#)), including the requirement to inform the public of 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\(2\)\(C\)](#).

CONDITIONS – SEPA

Prior to Issuance of any Permit to Construct or Demolish

1. The owner(s) and/or responsible party(ies) shall submit to DPD a copy of the PSCAA “notice of intent to demolish” prior to issuance of a demolition permit.
2. The owner(s) and/or responsible party(ies) shall submit to DPD evidence of PSCAA review and approval of the project’s proposed air emissions prior to issuance of a construction permit.

During Construction

The following conditions to be enforced during construction shall be posted at both sites in a location on the property line that is visible and accessible to the public and to construction personnel from the street right-of-way. The conditions will be affixed to placards prepared by DPD. The placards will be issued along with the building permit set of plans. The placards shall be laminated with clear plastic or other weatherproofing material and shall remain in place for the duration of construction.

3. For the duration of grading activity, the owner(s) and/or responsible party(ies) shall cause grading truck trips to cease during the hours between 4 PM and 6 PM on weekdays.
4. If resources of potential archaeological significance are encountered during construction or excavation, the owner and/or responsible parties shall stop work immediately and notify DPD (Scott Ringgold, 206-233-3856) and the Washington State Archaeologist at the State

[Office of Archaeology and Historic Preservation](#), Robert Whitlam, (360) 586-3080, or the current person in the position. The procedures outlined in Appendix A of Director's Rule [2-98](#) for Assessment and/or protection of potentially significant archeological resources shall be followed. The applicant(s) and/or responsible party(ies) shall abide by all regulations pertaining to discovery and excavation of archaeological resources, including but not limited to Chapters [27.34](#), [27.53](#), [27.44](#) RCW and Chapter [25.48](#) WAC, as applicable.

CONDITIONS – VARIANCES

None.

CONDITIONS – ADMINSTRATIVE CONDITIONAL USE

None.

Signature: (signature on file)
Scott A. Ringgold, Land Use Planner
Department of Planning and Development

Date: February 20, 2006