

## CITY OF SEATTLE

### ANALYSIS AND DECISION OF THE DIRECTOR OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT

#### SEPA Threshold Determination for the Pioneer Square Building Addition Height Amendments

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

**Location of Proposal:** The affected area is the Pioneer Square neighborhood within the Downtown Urban Center

#### BACKGROUND

##### Proposal Description

The proposal is prompted by a request to clarify rules for building additions that would extend above maximum structure height limits for existing buildings that already exceed those height limits. The original proposal submitted on December 4, 2006 to the City of Seattle Department of Planning and Development requests regulatory changes that would provide an exception to maximum structure height for “*infill additions*” to existing buildings, when such additions are “*adjacent to an alley on a non-street facing façade that is enclosed on at least two sides by walls of the same existing building.*”

The proposal, as amended by the Department of Planning and Development (DPD), supports the rationale for accommodating building additions in existing buildings above height limits in Pioneer Square, but adjusts the construction of the code amendments to maintain the relationship of maximum height limits to the Official Land Use Map. The DPD proposal amends the Land Use Code with a new subsection that would accomplish the same objectives as the original proposal.

The primary element of the proposed amendment in SMC 23.66.140 would indicate that in situations where an existing building already exceeds the maximum structure height of the zone, an infill addition may extend to the height of the existing structure. Other descriptive text clarifies that such an addition may occur only within an area bounded by an alley and at least two non-street-facing facades of the existing structure.

#### ANALYSIS - OVERVIEW

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

- *the proposal*, as described above and in memoranda;
- 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 proposed amendments would result in no immediate adverse short-term impacts because the adoption would be a non-project action. The discussion below generally evaluates the potential long-term impacts that might conceivably result from differences in future development patterns due to the proposed amendments.

### **Natural Environment**

#### **Earth, Air, Water, Plants/Animals/Fisheries, et al**

Minimal potential exists for significant adverse impacts to the natural environment with this proposal.

### **Built Environment**

#### **Relationship to Plans & Policies, Land Use, Height/Bulk/Scale, Aesthetics, Historic Preservation**

The proposal's potential for adverse impacts relates to the topics of land use, relationship to plans and policies, historic preservation, height/bulk/scale and aesthetics within the Pioneer Square historic district.

Pioneer Square's land use, plan/policy and historic preservation context derives from its key role as the city's original growth center, its well-preserved historic district consisting of numerous buildings with distinctive historical architectural character, and the zoning and special review district processes that define its distinct regulatory setting. The historic preservation mechanisms of this district work hand-in-hand with the land use and zoning codes, requiring review of most proposals for changes in the district by a Pioneer Square Preservation Board consisting of a variety of citizen representatives, with staff support by the Department of Neighborhoods. The Board makes recommendations to the Director of the Department of Neighborhoods. The intent is to maintain compatible land use and development patterns, of which much depends on maintaining the essential visual qualities and architectural character that contribute to the historic character.

Since 1985, the entire neighborhood has been zoned Pioneer Square Mixed (PSM), a zone distinct from other Downtown zones with its own prescriptions for height, bulk, uses and development standards. Within the neighborhood are three zoned height limit designations also set in 1985: 100-feet in central Pioneer Square, and two other designations with maximums of 120 feet in other areas, within which the 120 feet is attainable if the building is predominantly (75%) in residential uses. Building bulk is primarily defined by the encouragement of buildings to extend from lot-line to lot-line with no setbacks, meaning 100% coverage of the property for the full height of the building, reflective of the predominant height/bulk/scale character within the district. There are occasional variations in building bulk, meaning that certain buildings may have light wells or building modulation or less-than-100% coverage, but the prevailing pattern

mostly pushes building facades along public streets all the way to the sidewalk's edge. There are also variations in the typical heights of buildings in Pioneer Square. Some neighborhood vicinities have average building heights that are less than the zoned maximum, ranging from roughly 10-40 feet to approximately 60-80 feet.

A few of the existing historic structures in the neighborhood are taller than the zoned maximum structure height limits of 100 or 120 feet, including notable structures such as the Smith Tower and King Street Station Clock Tower, as well as the Frye Hotel, Alaska Building and the newer Olympic Building. Other large structures such as the King County Courthouse are located just outside the boundaries of the PSM zone. Heights of relevant buildings are shown below:

- Alaska Building (2<sup>nd</sup>/Cherry) 177 feet
- Frye Hotel (3<sup>rd</sup>/Yesler) 130 feet
- Smith Tower (2<sup>nd</sup>/Yesler) 467 feet
- Olympic Building (1<sup>st</sup>/Yesler) 112 feet
- King Street Station clock tower (near 2<sup>nd</sup>/King) 247 feet

The current proposal is narrowly drawn to address only the existing buildings that exceed the maximum structure height limits, and due to the proposed language, only the Frye Hotel and Alaska Building are considered potentially affected. The Smith Tower was the subject of a past contract rezone and would not be affected by this proposal. The King Street Station Clock Tower and the Olympic Building are considered not affected by this proposal due to the configuration of their building bulk. Review indicates that the proposal is likely only to create potential impacts on the Frye Hotel and Alaska Buildings, thus narrowing the potential impact area and magnitude of impacts.

The proposal further limits the potential for building additions to areas not along street-facing facades within areas enclosed on at least two sides by walls of the same building. This confines the potential for height/bulk/scale and aesthetic impacts to rear portions of buildings that are less visible from surrounding vicinities—only from angles of view west or east of the affected buildings.

The nature of the possible building additions includes infill of a 3-sided light well or gap created by building modulation on the west side of the Frye Hotel Building adjacent to an alley. Given topography and street network configuration, there is some potential that the infilled area would be visible from some vantage points, likely creating a smoother and slightly bulkier appearance to the Frye Hotel on that wall. This is considered an adverse impact but not a significant adverse impact of the proposal. The extent of impact would depend somewhat on the architectural features of the proposed addition and to what degree it would blend with the existing building's architecture.

In a similar vein, the Alaska Building could accommodate a building addition that would be visible from some vantage points to the east (such as Fourth Avenue/Cherry Street and Fifth Avenue/James Street), due to topography and low-height intervening buildings. Because the Alaska Building upper story bulk is L-shaped, the area potentially affected by an addition is larger than that of the Frye Hotel. An addition could appear as an additional rectangular building component, with visual compatibility depending upon the compatibility between the architectural

features of the proposed addition and the existing building's architecture. The current view toward that part of the Alaska Building includes brick walls, windows and fire escapes. A painted "Alaska Building" sign is located on an east-facing wall not likely affected by an addition. In terms of the potential aesthetic and height/bulk/scale impact, there is somewhat greater potential for adverse impacts at the Alaska Building than at the Frye Hotel. However, the impact potential at the Alaska Building is not judged to be a significant adverse impact as a result of this proposed zoning amendment, because the addition's height and bulk would approximately match the existing building height, and the design of the addition could help avoid most potential for significant adverse aesthetic visual impacts.

The evaluation of height/bulk and aesthetic visual impacts above is pertinent to the evaluation of land use and historic preservation impacts because the degree of visual compatibility is an important factor in retaining the overall character of the historic district. If there was potential for glaringly poor design, inappropriate materials, inordinate amounts of building bulk or disparities in building scale, there would be cause for concern about significant adverse height/bulk and aesthetic impacts. However, due to the protections afforded by land use and zoning codes and the Pioneer Square Preservation Board form of review, this impact potential is largely avoided. The impact potential is also significantly reduced by the low number of affected sites and the rearward location of potential additions. Given the limited extent of these impacts and their lack of conflict with the overall land use planning and policy intentions for the Pioneer Square neighborhood, no significant adverse land use and historic preservation impacts are identified for this proposal.

### **Other Elements of the Built Environment**

Minimal potential exists for significant adverse impacts to other elements of the built environment with this proposal.

### **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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