

PUBLIC SCHOOL DEVELOPMENT STANDARD ADVISORY COMMITTEE

VIEWLANDS ELEMENTARY SCHOOL DESIGN DEPARTURE RECOMMENDATIONS

Project #3036282-SD

October 2, 2020



This report is produced pursuant to the City of Seattle Municipal Code (SMC 23.44.006 F and 23.79) (the “Code”). The intent and purpose of this report is to document public comment and make recommendations to the City for modifications to development standards in order to facilitate construction of the new Viewlands Elementary School located at 10525 3rd Ave NW, Seattle, WA 98177.

Viewlands Elementary School Development Standard Advisory Committee Report and Recommendations

1. Background

1.1 Project Description

In March of 2020, the Seattle Public Schools submitted a request for departures from six (6) Seattle Municipal Code (SMC) Development Standards to accommodate a school replacement project at Viewlands Elementary School located at 10525 3rd Ave NW, Seattle.

Viewlands Elementary School has an existing enrollment of 385 students in a one-story, 1950's school building and 9 portable structures. The replacement project will provide a capacity of 650 students in grades Pre-K through 5th to address projected growth in Northwest Seattle. The proposed project would entirely replace the existing school on the same site with a building on the south side of the school site. All of the portables would be removed. The project addresses the topographical conditions on the site using the three-story building to connect to the site's existing three terraces that slope to the west toward Carkeek Park, while minimizing building footprint to maximize play areas.

The project goals developed by the School Design Advisory Team include infusing nature, outdoor learning and natural light throughout the project and creating a big heart to the campus where the school and community partners can gather while connected to Carkeek Park. In addition to the new school building the project would provide a staff and visitor parking lot, on-site school bus drop off area, outdoor learning and play areas, a new entry plaza at the level of 3rd Ave NW to welcome students and visitors arriving on foot and by bicycle, and a service and delivery access driveway at the south end of the site from NW 105th Street. The existing school load zone for automobiles on 3rd Avenue NW would be extended for the length of the frontage on 3rd Avenue NW. The project would also improve frontages along NW 107th Street and NW 105th Street.



Exhibit 1 Proposed Site Plan

1.2 Neighborhood Characteristics

The school's 6.5 acre (283,140 sf) site is bounded by 3rd Ave NW to the east, NW 107th Street to the north, NW 105th Street to the south, and to the west by Carkeek Park. A part of the site consists of an undeveloped area just west of the main campus that is separated by an unimproved section of public right-of-way (ROW); this part of the site is utilized for outdoor environmental learning. There is currently no development on this portion of the parcel and no plans for development on this portion of the parcel.

The current attendance area is bounded by 115th St (west of Aurora) 107th St (east of Aurora), I-5, 92nd St & 6th Ave NW. Zoning for Viewlands Elementary School and the parcels to the north, east and south is SF7200. Apart from Carkeek Park, most parcels surrounding the school have single family homes. Nearby commercial zones are on the Holman Road and Greenwood Ave corridors to the east and south of the site.

Existing site topography limits sites access at each of the frontages of the District property. The property is characterized by three major plateaus that run north-south, descending to the west. The significant topographic change across the site (~39' across the main parcel with additional steep slope to the west) creates challenges for access as well as opportunities for views to the Olympic Mountains to the west.

The elevation of 3rd Ave NW is above the existing level of the site for much of its length, and on all street frontages, street grade elevation only occasionally matches existing site grade elevation.

The western edge of the site contains numerous Environmentally Critical Areas (ECAs) where special considerations are required for any development or construction impact.

Bioinfiltration swales installed by Seattle Public Utilities are common along streets in this neighborhood. These swales were constructed to help reduce stormwater runoff pollution by slowing runoff and using planting to naturally remove pollutants. The bioinfiltration swale at the southwest corner of the site (frequently referred to as the Viewlands Cascade) extends onto SPS property

1.3 Requests for Departure and Process

The City initiated the Development Standard Departure Process, pursuant to SMC 23.44.006F and 23.79. The Code requires that the Department of Neighborhoods (DON) convene a Development Standard Advisory Committee (hereinafter referred to as “the Committee”) when the School District proposes a departure from the development standards identified under the Code. These standards are popularly referred to as the “zoning code.”

The purpose of the Committee is 1) to gather public comment and evaluate the proposed departures for consistency with the objectives and intent of the City’s land use policies to ensure that the proposed facility is compatible with the character and use of its surroundings; and 2) to develop a report and recommendation to the Seattle Department of Construction and Inspections (SDCI) from DON. (SMC 23.79.008)

Due to public health mandates on social distancing and limited gatherings related to COVID-19, the Seattle City Council approved legislation on Monday, April 27, to keep key projects safely moving forward for at least 180-days by suspending public meeting requirements.

While this ordinance is in effect, in lieu of the committee holding public meetings, DON staff will accept written public comment and the Director of DON will make a recommendation to SDCI, taking into consideration the public’s comments.

Following completion of the Recommendation Report and its transmittal to SDCI, the Director of SDCI will issue a formal report and decision. The Director of SDCI will consider the recommendations and will determine the extent of departure from established development standards which may be allowed, as well as identify all mitigating measures which may be required. The Director’s decision is appealable.

2. Departures

2.1 Specific District Requests

Viewlands Elementary School is proposed to be replaced with a new building and site development to accommodate up to 650 students. In order to accommodate the education program for this project, the District requested the following (a total of six) departures from provisions of the SMC 23.79.008 C1a.

Departure #1 – Greater than Allowed Building Height

Existing Standard: SMC 23.51B.002.D

For new public school construction on existing public school sites, the maximum permitted height is 35 feet plus 15 feet for a pitched roof. All parts of the roof above the height limit must be pitched at a rate of not less than 4:12. No portion of a shed roof is permitted to extend beyond the 35 foot height limit under this provision.



Exhibit 2 Proposed Height

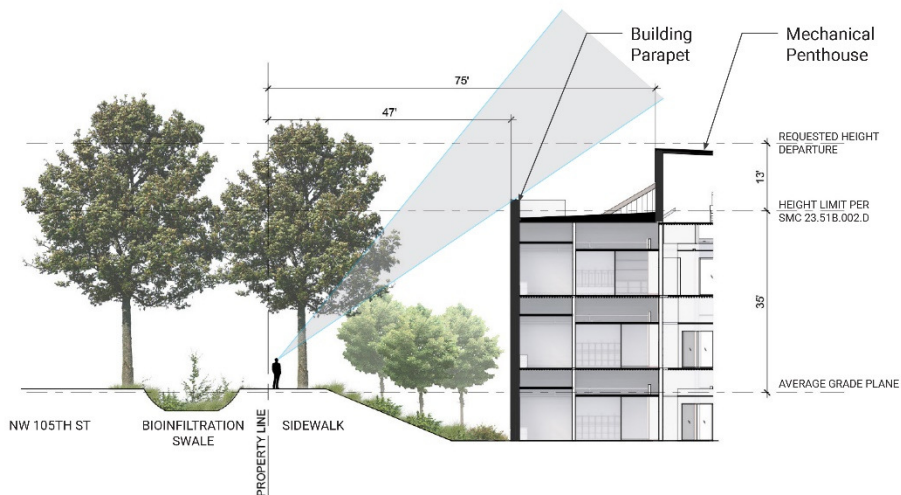


Exhibit 3 Proposed Height

Departure Requested: 13 feet above the height limit.

Departure #2 – Less than Required Off-street Parking

Existing Standard: SMC 23.54.015 (Table C – Row N)

1 space for each 80 square feet of all auditoria or public assembly rooms, or 1 space for every 8 fixed seats in auditoria or public assembly rooms containing fixed seats, for new public schools on a new or existing public school site.

Per footnote 7: When an existing public school on an existing public school site is remodeled, additional parking is required if any auditorium or other place of assembly is expanded or

additional fixed seats are added. Additional parking is required as shown on Table C for 23.54.015 for the increase in floor area or increase in number of seats only.

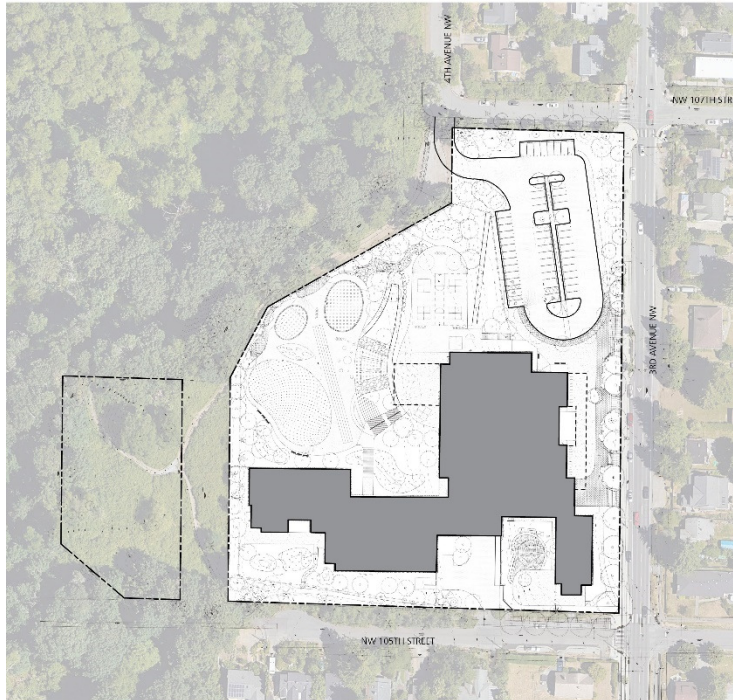


Exhibit 4 Proposed On-Site Parking

Departure Requested: to allow for 96 parking spaces less than the code required parking to be provided on-site. [146 required stalls – 50 proposed stalls = 96 stall departure requested]

Departure #3 – Bicycle Parking (Long Term) Quantity

Existing Standard: SMC 23.54.015 Table D

Long-term parking for bicycles shall be for bicycles parked four or more hours.

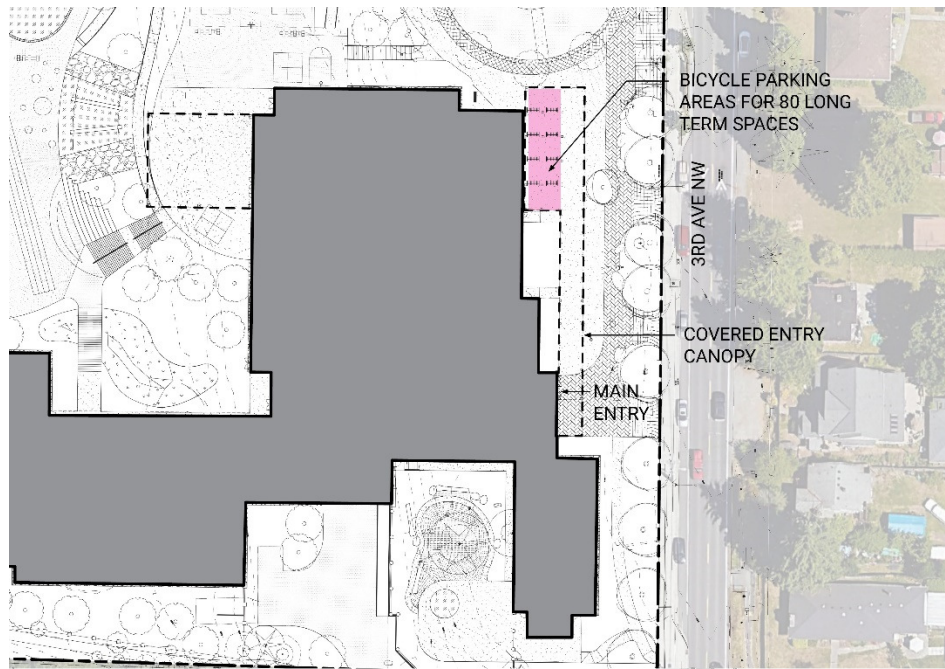


Exhibit 5 Proposed Long-Term Bicycle Parking

Departure Requested: to allow for 49 bicycle parking spaces less than the code required parking to be provided on-site. [129 required stalls – 80 proposed stalls = 49 stall departure requested]

Departure #4 – Bicycle Parking (Short Term) Quantity

Existing Standard: SMC 23.54.015 Table D

Short-term parking for bicycles shall be for bicycles parked four or fewer hours.

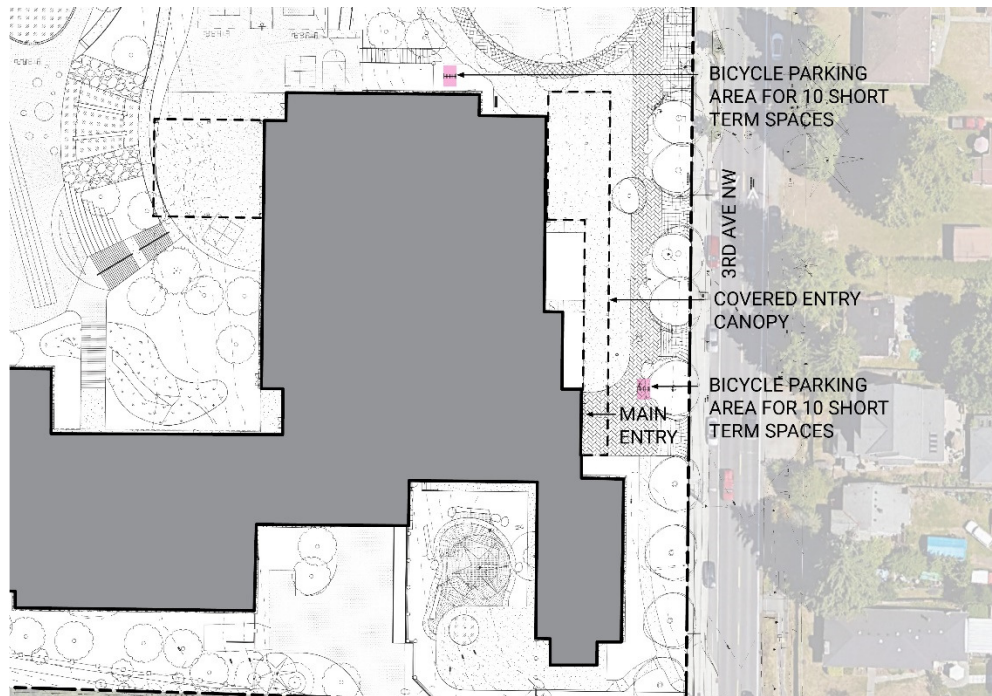


Exhibit 6 Proposed Short-Term Bicycle Parking

Departure Requested: to allow for 23 bicycle parking spaces less than the code required parking to be provided on-site. [43 required stalls – 20 proposed stalls = 23 stall departure requested]

Departure #5 – Bicycle Parking Standards

Existing Standard: SMC 23.54.015.K.2.a

2. Performance standards. Provide bicycle parking in a highly visible, safe, and convenient location, emphasizing convenience and theft deterrence, based on rules promulgated by the director of the Seattle Department of Transportation that address the considerations in this subsection 23.54.015.k.2.

2.a. Provide secure locations and arrangements of long-term bicycle parking, with features such as locked rooms or cages and bicycle lockers. The bicycle parking should be installed in a manner that avoids creating conflicts with automobile accesses and driveways.

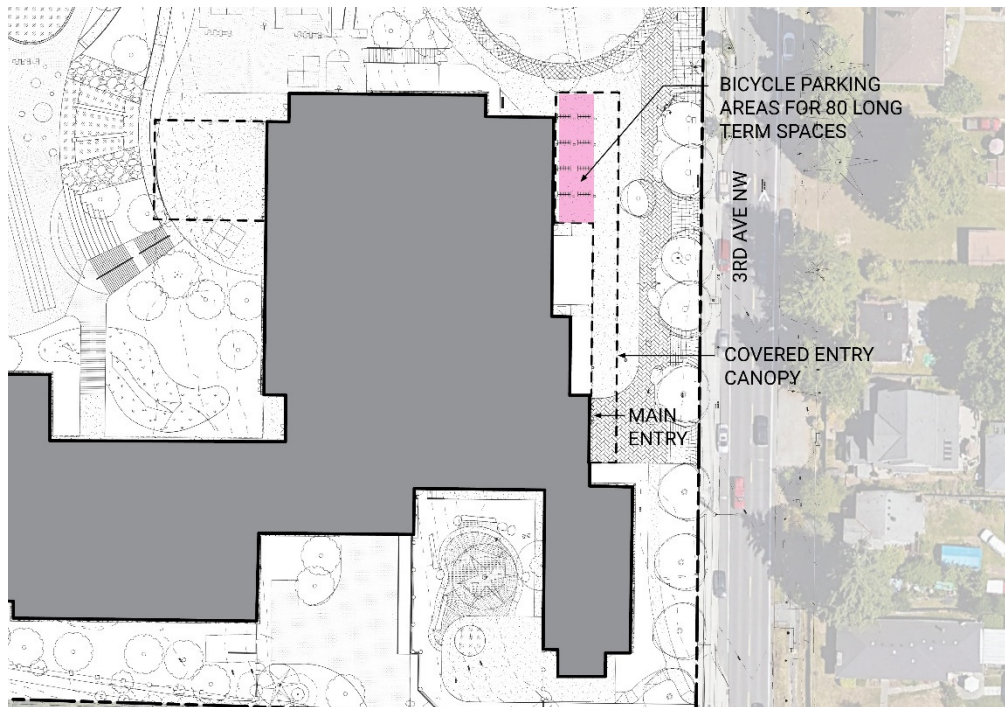


Exhibit 7 Proposed Location of Long-Term Bicycle Parking

Departure Requested: Provide open bike racks for long-term bicycle parking rather than locked rooms, cages, or lockers

Departure #6 – Double-Sided, Electronic, Changing Image Message Board

Existing Standard: SMC 23.55.020.B

- B. No flashing, changing image or message board signs shall be permitted.
- D. The following signs are permitted in all single family zones:
 - 7. For elementary or secondary schools, one electric or nonilluminated double-faced identifying sign, not to exceed 30 square feet of area per sign face on each street frontage, provided that the signs shall be located and landscaped so that light and glare impacts on surrounding properties are reduced, and so that any illumination is controlled by a timer set to turn off by 10 p.m.



Exhibit 8 Proposed Location of Message Board (3rd Ave NW)

Departure Requested: To install a double-sided, electronic, changing image message board.

2.2 DON Review and Recommendations

2.2.1 Public Comment

The public comment period was opened on August 2, 2020. A press release was sent out directly to media outlets, shared in the Viewlands newsletter and staff bulletin, and sent out to a project distribution list of approximately 37 individuals. In addition, postcards were sent to addresses within approximately 600 ft of the school. Signs were also posted at the perimeter of the school requesting public comment and shared in the Land Use Information Bulletin (LUIB).

A total of 14 public comments were received.

2.2.2 Review Criteria

Section 23.79 of the Code directs the Committee to evaluate the requested departures for consistency with the general objectives and intent of the Code, and to balance the interrelationships among the following factors:

a. Relationship to Surrounding Areas:

- (1) Appropriateness in relation to the character and scale of the surrounding area
- (2) Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale.
- (3) Location and design of structures to reduce the appearance of bulk;
- (4) Impacts on traffic, noise, circulation and parking in the area; and
- (5) Impacts on housing and open space.

b. Need for Departure: The physical requirements of the specific proposal and the project's relationship to educational needs shall be balanced with the level of impacts on the surrounding area. Greater departure may be allowed for special facilities, such as a gymnasium, which are unique and/or an integral and necessary part of the educational process; whereas, a lesser or no departure may be granted for a facility which can be accommodated within the established development standards.

2.2.3 Application of Review Criteria to Requested Departures and Committee Recommendations

The Seattle Municipal Code intent is to grant departures from the requirements of the Municipal Code to accommodate the educational needs of the programs to be located in single family zoned neighborhoods. The School District has demonstrated that it cannot accommodate the program necessary for this area without granting departures for: 1) height, 2) parking, and 3) long term bicycle parking, 4) short term bicycle parking, 5) bicycle parking standards, and 6) a double-sided, electronic, changing image message board.

Need for Departures

One community member commented that the project would harm the neighborhood, and the impacts on the neighborhood are out of balance with the need for the departures. However, overall, the community was supportive of the project and shared concerns regarding bicycle infrastructure. One commenter pointed out that due to the current pandemic, a project of this size should be reconsidered to reflect the future, changing needs of education.

DEPARTURE #1 – GREATER THAN ALLOWED BUILDING HEIGHT

- 1) **Appropriateness in relation to the character and scale of the surrounding area** were considered by the community, and they did not have concerns about the school's increased height having an impact on its relationship to the surrounding neighborhood.
- 2) **Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale** were considered by the community, and they did not have concerns about the school's increased height having an impact on the transition in scale.
- 3) **Location and design of structures to reduce the appearance of bulk** were considered by the community, and they did not have concerns about the school's increased height having an impact on the appearance of bulk.

- 4) **Impacts on traffic, noise, circulation and parking in the area** were considered by the community, and they did not have concerns about the school's increased height having an impact on traffic, circulation and parking in the neighborhood.
- 5) **Impacts on housing and open space** were considered by the community, and they did not have concerns about the school's increased height having an impact on housing and open space.

The overwhelming opinion in the comments was in support for the greater than allowed building height. The request for departure 13' additional height at the mechanical penthouses is a relatively short section of the building and has been set back far enough from 3rd Avenue NW that it will be minimally noticeable to the neighborhood.

While some commenters felt the building should be no taller than two-stories and questioned the City's methods for determining average existing grade, the design team was creative in using the steep grading of the property to hide the building. From the street, it will look like a one-story building.

After consideration of the above, the Department of Neighborhoods recommends:

Recommendation 1 – That the departure to allow greater than allowed building height be GRANTED as requested by Seattle Public Schools.

DEPARTURE #2 – LESS THAN REQUIRED OFF-STREET PARKING

- 1) **Appropriateness in relation to the character and scale of the surrounding area** were considered by the community, and they did not have concerns about less than required off-street parking having an impact on its relationship to the surrounding area.
- 2) **Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale** were considered by the community, and they did not have concerns about less than required off-street parking having an impact on the transition in scale.
- 3) **Location and design of structures to reduce the appearance of bulk** were considered by the community, and they did not have concerns about less than required off-street parking having an impact on the appearance of bulk.
- 4) **Impacts on traffic, noise, circulation and parking in the area** were considered by the community, and they did have concerns about less than required off-street parking having an impact on traffic, circulation and parking in the neighborhood, which were addressed in the recommended conditions.
- 5) **Impacts on housing and open space** were considered by the community, and they did not have concerns about less than required off-street parking having an impact on housing and open space.

The community varied in their opinions on this topic. Some wanted to see a further reduction in vehicle parking, and others felt that what is being proposed is an indication that this project is out of scale with the neighborhood. Many schools in our city have little or no on-site parking. School sites should prioritize use for learning and play, rather than parking private automobiles that

encourage single-occupancy travel. Many are thrilled to have at least 50 safe spaces for cars, including ADA spaces.

There is plentiful on-street parking around the site. The proposed parking lot allows more of the property to be devoted to outdoor classroom and play space. Most did not want to see a parking lot taking up valuable space that the neighbors and students could be enjoying as a playground.

After consideration of the above, the Department of Neighborhoods recommends:

Recommendation 2 – That the departure to allow less than required off-street parking be GRANTED as requested by the Seattle Public Schools without modification and with the following conditions:

- 1) **Transportation Management Plan (TMP):** Prior to the school reopening, the District and school Principal should establish a TMP to educate families about the access load/unload procedures for the site layout. The TMP should also encourage school bus ridership, carpooling, and supervised walking (such as walking school buses). The plan should require the school to distribute information to families about drop-off and pick-up procedures, as well as travel routes for approaching and leaving the school. It should also instruct staff and parents not to block or partially block any residential driveways with parked or stopped vehicles.
- 2) **Engage Seattle School Safety Committee:** The District should continue the ongoing engagement with the Seattle School Safety Committee (led by SDOT) to review the new access for pedestrian and bicycles and determine if any changes should be made to crosswalks, traffic control, crossing guard locations, or to help encourage pedestrian and non-motorized flows at designated crosswalk locations.
- 3) **Develop Neighborhood Communication Plan for School Events:** The District and school administration should develop a neighborhood communication plan to inform nearby neighbors of large events each year. The plan should be updated annually (or as events are scheduled) and should provide information about the dates, times, and rough magnitude of large-attendance events. The communication would be intended to allow neighbors to plan for the occasional increase in on-street parking demand that would occur with large events.
- 4) **Update right-of-way and curb-side signage:** The District should work with SDOT to confirm the locations, restrictions, and durations for curb-side parking and load/unload zones adjacent to the school.

DEPARTURE #3 – BICYCLE PARKING (LONG TERM) QUANTITY

- 1) **Appropriateness in relation to the character and scale of the surrounding area** were considered by the community, and they did not have concerns about bicycle parking (long term) quantity having an impact on the surrounding area.
- 2) **Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale** were considered by the community,

and they did not have concerns about bicycle parking (long term) quantity having an impact on the transition in scale.

- 3) **Location and design of structures to reduce the appearance of bulk** were considered by the community, and they did not have concerns about bicycle parking (long term) quantity having an impact on the appearance of bulk.
- 4) **Impacts on traffic, noise, circulation and parking in the area** were considered by the community, and they did have concerns about bicycle parking (long term) quantity having an impact on traffic, circulation and parking the neighborhood.
- 5) **Impacts on housing and open space** were considered by the community, and they did not have concerns about bicycle parking (long term) quantity having an impact on housing and open space.

Of the comments received on this departure, only one recommended it be outright denied due to its harm on the neighborhood. All other comments questioned whether the 89 bicycle parking spots offered was sufficient to meet the future demand of commuting to school by bike and allow the school community to grow into the number of bicycle parking stalls. As one commenter noted, the proposed long-term bicycle parking is a significant improvement over what is currently there.

Something the school district will need to do in order to encourage students to walk or bike to school is to ensure the sidewalk infrastructure around the school is upgraded. The hope is that more students and staff will bike to school. At this time, that is not the case, and the proposed number of stalls will hopefully begin to encourage more people to bike to school.

After consideration of the above, the Department of Neighborhoods recommends:

Recommendation 3 – That the departure to allow less than required long term bicycle parking be GRANTED as requested by the Seattle Public Schools.

DEPARTURE #4 – BICYCLE PARKING (SHORT TERM) QUANTITY

- 1) **Appropriateness in relation to the character and scale of the surrounding area** were considered by the community, and they did not have concerns about bicycle parking (short term) quantity having an impact on the surrounding area.
- 2) **Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale** were considered by the community, and they did not have concerns about bicycle parking (short term) quantity having an impact on the transition in scale.
- 3) **Location and design of structures to reduce the appearance of bulk** were considered by the community, and they did not have concerns about bicycle parking (short term) quantity having an impact on the appearance of bulk.
- 4) **Impacts on traffic, noise, circulation and parking in the area** were considered by the community, and they did have concerns about bicycle parking (short term) quantity having an impact on traffic, circulation and parking the neighborhood, which were addressed in the following modification.

- 5) **Impacts on housing and open space** were considered by the community, and they did not have concerns about bicycle parking (short term) quantity having an impact on housing and open space.

Access to safe, secure, long-term bicycle parking is something the city and community value. The community wants to encourage commuting by bicycle and having a place to park your bike during the day is believed to be essential in encouraging that.

After consideration of the above, the Department of Neighborhoods recommends:

Recommendation 4 – That the departure to allow less than required short term bicycle parking be GRANTED with the following modification:

- 1) **Seattle Public Schools provide at a minimum 50% of the code required number of short-term bike parking stalls**

DEPARTURE #5 – BICYCLE PARKING STANDARDS (ENCLOSURE)

- 1) **Appropriateness in relation to the character and scale of the surrounding area** were considered by the community, and they did not have concerns about providing open bike racks for long-term bicycle parking rather than locked rooms, cages or lockers having an impact on its relationship to the surrounding area.
- 2) **Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale** were considered by the community, and they did not have concerns about providing open bike racks for long-term bicycle parking rather than locked rooms, cages or lockers having an impact on the transition in scale.
- 3) **Location and design of structures to reduce the appearance of bulk** were considered by the community, and they did not have concerns about providing open bike racks for long-term bicycle parking rather than locked rooms, cages or lockers having an impact on the appearance of bulk.
- 4) **Impacts on traffic, noise, circulation and parking in the area** were considered by the community, and they did have concerns about providing open bike racks for long-term bicycle parking rather than locked rooms, cages or lockers having an impact on traffic, circulation and parking the neighborhood, which were addressed in the following modification.
- 5) **Impacts on housing and open space** were considered by the community, and they did not have concerns about providing open bike racks for long-term bicycle parking rather than locked rooms, cages or lockers having an impact on housing and open space.

Access to safe, secure, long-term bicycle parking is something the city and community value. The community wants to encourage bicycle parking and having a place to park your bike during the day is believed to be essential in encouraging that. This is especially important for teachers and staff who may be at the school outside normal hours and may need to additional security.

After consideration of the above, the Department of Neighborhoods recommends:

Recommendation 5 – That the departure to allow open bike racks for long-term bicycle parking rather than locked rooms, cages, or lockers be GRANTED with the following modification:

- 1) **Seattle Public Schools provide at a minimum 1 long-term bicycle parking space per classroom that meets the standards identified in SMC 23.54.015.K.2.**

DEPARTURE #6 – DOUBLE-SIDED, ELECTRONIC, CHANGING IMAGE MESSAGE BOARD

- 1) **Appropriateness in relation to the character and scale of the surrounding area** were considered by the community, and they did have concerns about a message board having an impact on the surrounding area. The community discussed a variety of mitigation measures for the sign design and use and recommended conditions listed below.
- 2) **Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale** were considered by the community, and they did not have concerns about a message board having an impact on the transition in scale.
- 3) **Location and design of structures to reduce the appearance of bulk** were considered by the community, and they did not have concerns about a message board having an impact on the appearance of bulk.
- 4) **Impacts on traffic, noise, circulation and parking in the area** were considered by the community, and they did not have concerns about a message board having an impact on traffic, circulation and parking the neighborhood.
- 5) **Impacts on housing and open space** were considered by the community, and they did not have concerns about a message board having an impact on housing and open space.

Concerns around the electronic sign were around the height and brightness of the sign. The proposed sign would be a monument sign, meaning it will be on the ground and not on a poll. Settle Public Schools has proposed conditions in order to ensure the sign is consistent with the neighborhood and is able to equitably communicate with the diverse community at Viewlands Elementary School

After consideration of the above, the Department of Neighborhoods recommends:

Recommendation 6 – That the departure to allow an electronic message board be GRANTED as requested by the Seattle Public Schools without modification and with the following conditions:

- 1) **Limited to one double-faced sign**
- 2) **Time of use is restricted to 7:00 a.m. - 9:00 p.m.**
- 3) **The sign must be lit using one color with a dark background**
- 4) **No flashing, scrolling, or moving images allowed.**

Departure #1	Building Height	Granted
Departure #2	Parking Quantity	Granted w/conditions
Departure #3	Bicycle Parking (Long Term)	Granted
Departure #4	Bicycle Parking (Short Term)	Granted with modification

Departure #5	Bicycle Parking Standards	Granted with modification
Departure #6	Message Board	Granted with conditions

Maureen Sheehan,
Department of Neighborhoods

September 2, 2020

Attn. Maureen Sheehan
P.O. Box 94649
Seattle, WA 98124-4649
Maureen.Sheehan@seattle.gov

Re: Bike Parking Departure Request for Viewlands Elementary School

Dear Ms. Sheehan,

We are deeply troubled by the continued requests by Seattle Public Schools (“SPS”) for departures from bicycle parking requirements. The latest departure requests are for Viewlands Elementary School.

Because of our concerns, we are writing this comment letter to carefully dissect what aspects of bicycle parking is reviewable by the School Development Standard Departure Advisory Committee (“School Departure Committee”), what factors the committee must evaluate in recommending departures, and what standards of review to apply.

Introduction

Providing sufficient bicycle parking in terms of both quantity and quality matters. Throughout numerous city plans and policies, the City of Seattle recognizes bicycling as an important solution to mitigating climate change, increasing affordability, increasing access to jobs and education, and encouraging a healthy lifestyle, especially among children.

That’s why the Seattle Bicycle Master Plan, adopted by Seattle City Council in 2014, calls for quadrupling bicycle ridership by 2030, which would result in approximately 12.5 percent of workers commuting by bike.

When Seattle City Council updated the bicycle parking code just two years ago in 2018, the council also had their goal to quadruple bicycle ridership in mind. Buildings last 100+ years, so it’s critical that new buildings have sufficient bicycle parking in order to accommodate bicycle ridership growth.

Without a safe place to park a bike, students are much less likely to ride to school. A recent [study](#) found that increased bike parking at schools correlated with a 5x increase in bicycle ridership. While getting kids to bike to school requires many actions, including safe streets, training, and encouragement programs, providing sufficient bicycle parking is essential.

The minimum quantity requirements in the 2018 bicycle parking code update are predicated on providing “long-term bicycle parking” for at least 10 percent of the people in non-residential

buildings, and nearly 100 percent in residential buildings. The longer a bike is parked in an unsecured location, the more likely it is to be stolen. For this reason, “long-term bicycle parking” is required to be in a locked, secure area so people can be reasonably assured their bike will not be stolen when parked for longer than 4 hours.

The 2018 bicycle parking code purposefully required new schools to provide 3 long-term and 1 short-term spaces per classroom. The updated ratio reflects that with an average class size of approximately 30 students, 3 long-term bike spaces per classroom enables 10 percent of students and teachers to bike to school. The extra short-term space is available for school visitors and as excess capacity when more than 10 percent of students bike to school. Furthermore, while school bicycle ridership may not reach a daily average of 10 percent until 2030 or later, even when Viewlands Elementary opens it will be important to provide sufficient bike parking capacity for peak ridership days, such as Bike to School Day.

When city council set the quantity requirements in the 2018 code update, schools were by no means unique in how the amount of required long-term bicycle parking was determined. Similar math was used for establishing the bicycle parking requirements for all non-residential land uses by calculating the average number of employees per square-foot and setting a bike parking ratio nearly equal to 10 percent.

Every year, the City of Seattle and SPS dedicate millions of dollars to encouraging kids to bike to school. The City and SPS improve the safety of streets around elementary schools through the Safe Routes to School Program, enforce slower traffic speeds through the School Speed Zone Program, and partner with Cascade Bicycle Club to train kids on how to safely ride to school. The City and SPS are on the right side of promoting kids to bike to school — bicycling is an important solution for the environment, affordability, equity, and health. SPS should not squander its investments by making short-sighted decisions for bike parking at new schools.

Seattle City Council and the Seattle Department of Transportation (“SDOT”) have established the codes, policies, and guidelines for bicycle parking for all new buildings, including new schools. These codes, policies, and guidelines are informed by national best practices with careful input from experts in the field. Without its own expertise in bicycle parking, the School Departure Committee should defer to the standards and guidelines established by city council and SDOT.

Applicable Standards for Review

Agency actions, including that of the School Departure Committee must be within the power given by the agency’s enabling legislation. If it is not, then the action is *ultra vires* and the agency lacks authority to make the decision.

According to SMC 23.79 and its bylaws, the School Departure Committee does not simply review SPS’s requested departures to determine if the requests are okay. The School Departure Committee considers any departures *de novo*, meaning it makes its own independent assessment of whether a departure is necessary for educational purposes, balances the educational need against factors of

neighborhood impact, and makes its own independent recommendation to the Department of Neighborhoods. The committee owes no deference to SPS.

Informed by the committee's recommendation, the Department of Neighborhoods then makes its own recommendation to the Seattle Department of Construction and Inspections ("SDCI"). However, there are certain issues which remain the domain of other departments. This includes the bicycle parking performance standards, design criteria, and allowed reduction for some land uses, which are set and reviewed by SDOT (SMC 23.54.015.K.2).

The factors by which the School Departure Committee must evaluate whether a requested departure is merited and even allowable are set forth in SMC 23.79.008.C.1:

Departures shall be evaluated for consistency with the general objectives and intent of the City's Land Use Code, including the rezone evaluation criteria in Chapter 23.34 of the Seattle Municipal Code, to ensure that the proposed facility is compatible with the character and use of its surroundings. In reaching recommendations, the advisory committee shall consider and balance the interrelationships among the following factors:

- a. Relationship to Surrounding Areas. The advisory committee shall evaluate the acceptable or necessary level of departure according to:
 - (1) Appropriateness in relation to the character and scale of the surrounding area;
 - (2) Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale;
 - (3) Location and design of structures to reduce the appearance of bulk;
 - (4) Impacts on traffic, noise, circulation and parking in the area; and
 - (5) Impacts on housing and open space. More flexibility in the development standards may be allowed if the impacts on the surrounding community are anticipated to be negligible or are reduced by mitigation; whereas, a minimal amount or no departure from development standards may be allowed if the anticipated impacts are significant and cannot be satisfactorily mitigated.
- b. Need for Departure. The physical requirements of the specific proposal and the project's relationship to educational needs shall be balanced with the level of impacts on the surrounding area. Greater departure may be allowed for special facilities, such as a gymnasium, which are unique and/or an integral and necessary part of the educational process; whereas, a lesser or no departure may be granted for a facility which can be accommodated within the established development standards.

After the consideration and balancing of the interrelationships between the above factors, the committee may make recommendations only for the departures that are allowed under SMC 23.54 (SMC 23.79.008.C.3). The city's bicycle parking requirements are under SMC 23.54.015.K, which provides very limited circumstances in which departures can be sought:

- Major institutions seeking a master permit ("MIMP") may request a bicycle parking quantity reduction based on the "topography, location, nature of the users of the institution or other reasons" (SMC 23.54.015.B). SDOT is the agency that reviews MIMPs.

- Some affordable and senior housing projects may be granted a bicycle parking quantity reduction by SDOT if the agency determines the “residents are less likely to travel by bicycle” (footnote 4 to Table D of SMC 23.54.015). Seattle City Council is currently expanding this exception to include more senior and affordable housing projects.
- Spectator sports and music venues may provide required short-term bicycle parking instead with a bike valet service, provided they have an approved transportation management plan (“TMP”) to do so. (footnote 2 to Table D of SMC 23.54.015). SDOT is the agency that reviews TMPs.
- On a “functionally interrelated campus containing more than one building,” SDOT may approve a departure of a requirement that bicycle parking must be on the lot — allowing the bicycle parking to be up to 600 feet away from the lot — if the bicycle “parking in the public place [is] sufficient in quality to effectively serve bicycle parking demand from the site” (emphasis added).

There are no other allowed departures for bicycle parking. The other requirements for bicycle parking — none of which have allowed departures — include all other quantity requirements outlined in Table D for SMC 23.54.015, and the “performance standards” and “quality” requirements as outlined in SMC 23.54.015.K.2. The SMC specifically grants SDOT the authority to further define the performance standards and design criteria, which it does through its [Seattle Bicycle Parking Guidelines](#).

Absent a specifically stated different standard of review, administrative bodies like the School Departure Committee generally must make decisions based on a “rational basis.” Under a rational basis standard, the School Departure Committee must make its own departure recommendation without deference to SPS, *constrained by its own legal limits and the above listed factors*, and the recommendation must be such that a reasonable person could come to the same conclusion.

Analysis of SPS’s Requested Departures

SPS requests three departures regarding the bicycle parking requirements:

- A reduction of long-term bike parking quantity from 123 to 80 bike parking spaces (38%).
- A reduction of short-term bike parking quantity from 43 to 20 bike parking spaces (58%).
- A change in the performance standards of the required bicycle parking, effectively converting all 80 of its proposed long-term bike parking spaces into short-term bike parking (0% long-term, 233% short-term bike parking).

These departure requests should be denied for the following five reasons.

1. The requested departures are not allowed

Pursuant to SMC 23.79.008.C.3, for the School Departure Committee to consider a requested departure, the departure must be allowable under SMC 23.54.

Elementary schools are not one of the land uses that the code allows a reduction in bicycle parking. Departures from bicycle parking quantity requirements only exist for major institutions seeking master plan approval, senior housing, and affordable housing. Viewlands Elementary School is none of these. Furthermore, SMC 23.54 does not allow for deviations from performance standards except

in allowing bike valet at spectator sports and entertainment venues. Viewlands Elementary is not a spectator sport or entertainment venue.

As such, the requested departures are not permissible.

2. The requested departures cannot be considered by the School Departure Committee

In order to act, agencies must be granted the legal authority. SMC 23.79.008.C.3 requires any departure recommended by the School Departure Committee to be authorized by SMC 23.54. Quantity and performance standards requirements are not permissible departures for elementary schools. As such, the requested departures are not to be considered by the School Departure Committee.

3. Even if reviewable, the departure requests do not meet the standards by which the School Departure Committee must evaluate requests.

The School Departure Committee must “consider and balance” several factors when evaluating departure requests. In analyzing those factors laid out in SMC 23.79.008.C.1, SPS’s attempt to reduce the required quantity and performance standards of bicycle parking:

- Has no relationship to the character or scale of the surrounding area;
- Has no relationship to the presence of edges which provide a transition in scale;
- Has no relationship to the location or design of structures to reduce the appearance of bulk;
- May, in fact, have a detrimental impact on vehicular traffic, noise, circulation, and parking in the area as fewer kids biking to school may increase parents driving their kids to school;
- Has no relationship to housing or open space; and
- Is not a “needed” departure for educational purposes.

As demonstrated, nearly all of the standards by which the School Departures Committee reviews departure requests are simply inapplicable when reviewing bicycling parking. This further reinforces the argument that bicycle parking is not a subject that is reviewable by the School Departure Committee.

In arguing for a reduction in the amount of bicycle parking to provide, SPS states that current bicycle ridership is not high and thus the full amount of bicycle parking is not needed. But this is not the standard by which the School Departure Committee is to judge “need.”

Instead, the committee must balance the physical impact that the new school will have on the surrounding area against the educational needs of the school (SMC 79.008.C.1.b). To illustrate, the code provides the example of a gymnasium that may exceed zoned square-footage or height restrictions but that is a necessary part of children’s educational experience.

SPS’s burden of argument is to demonstrate that the requested departure is necessary for the educational process. For its Viewlands Elementary School departure requests, SPS makes no such

argument. In fact, it would be ludicrous to argue that fewer bike parking spaces or a lower performance standard would be beneficial to children’s educational experience.

Numerous studies show the benefits that bicycling has on student learning and physical and mental health. That’s why SPS and Seattle City Council spend millions on improving the safety of streets around schools and partnering with Cascade Bicycle Club to train kids on how to ride to school. Reducing bicycle parking is inconsistent with promoting children’s educational experience.

SPS has not met the standards of review that is required of the School Departure Committee.

4. SPS impermissibly attempts to redefine performance standards

SPS seeks to redefine long-term bicycle parking to include an unsecure area, in direct contradiction to the Seattle Municipal Code and Seattle Bicycle Parking Guidelines. In effect, this redefinition would result in 100 percent of the school’s bicycle parking as unsecured short-term parking, leaving zero percent long-term bicycle parking.

Long-term bicycle parking is defined as “for bicycles parked four or more hours,” and short-term bicycle parking as “for bicycles parked less than four hours” (SMC 23.54.015.K). Both short-term and long-term bicycle parking must be provided “in a highly visible, safe, and convenient location, emphasizing user convenience and theft deterrence” (emphasis added). In addition, long-term bicycle parking specifically must be provided in “secure locations and arrangements . . . with features such as locked rooms or cages and bicycle lockers.”

Further defining long-term bicycling parking, SDOT’s Seattle Bicycle Parking Guidelines state that bicycle rooms, cages, and other secure parking areas, “must be secured by key, smart card, or code access and under surveillance by attendant or video camera” (page 14).

Simply having a roof over the bicycle parking does not make it long-term parking. Indeed, the Seattle Bicycle Parking Guidelines recommends providing weather protection (building awnings, overhangs, and shelters enhancements) and full time lighting as “enhancements” to short-term bicycle parking (pages 9 & 10). Although full weather protection is required for long-term bike parking, the essential difference between long-term and short-term bicycle parking is controlled access.

Seattle Public Schools, School Departure Committee, Department of Neighborhoods, and SDCI do not have the authority to change the definition of long-term bicycle parking. The Seattle Municipal Code expressly grants the authority to define long-term bicycle parking to SDOT (SMC 23.54.015.K.2 & 23.54.015.K.2.g).

The code and SDOT’s guidelines call for long-term bicycle parking to be within a closed area, whether it is a bike locker, cage, room, or other keyed access storage area. The wisdom of the requirement is not up to the Seattle Departure Committee, which is not an agency with expertise in bicycle parking.

Many Seattle schools, such as Eckstein Middle School and McDonald International School, are able to provide covered bicycle parking within a cage or other fenced-in area. There is no reason why the architects and the future administrators and teachers of Viewlands Elementary School cannot also install and manage a long-term bicycle parking area that meets the city's performance standards. Ideally, the long-term bicycle parking would be in a secure bike room inside the building, similar to many commercial buildings throughout Seattle. Alternatively, the bike parking could be in the inside entryway with a security camera and front reception attendant, school security guard, or other welcoming school staff or volunteer providing passive security with "eyes on" the bike parking area.

5. The proposed bicycle racks do not meet the performance standards

On slides 75 and 79 of its presentation, SPS states, "Bicycle racks shown are per the SDOT Bicycle Standards." Based on the illustrations in the presentation, this does not appear to be the case.

In SPS's presentation, the renderings on slides 48 and 56 and diagrams on slides 75, 79, and 83 show the bicycle racks to be installed are Cora "coathanger" bicycle racks. This style of rack is expressly not approved by SDOT.

Bicycle racks must meet "any design criteria promulgated by the Director of the Seattle Department of Transportation" (SMC 23.54.015.K.2.g). SDOT's [Seattle Bicycle Parking Guidelines](#) require racks for short-term bicycle parking to support bicycles' frames in two locations (page 18), which Cora coathanger bicycle racks do not do. Racks should also provide adequate spacing between bicycles and prevent handlebar entanglement. For these reasons, SDOT, Seattle Parks & Recreation Department, Sound Transit, and King County Metro no longer approve this style of rack. In its [Essentials to Bike Parking](#) guide, the Association of Pedestrian and Bicycle Professionals ("APBP") also explicitly states that coathanger racks are disfavored.

Other diagrams within SPS's proposal indicate that the architect has at least considered another style of bicycle rack — a "staple" or "inverted-U" rack. Using a staple or inverted-U rack is considered best practice as it supports bike frames in two locations and can provide better spacing of bikes when properly installed. SDOT and Seattle Parks have established staple and inverted-U racks as their preferred bike rack style. SPS should be instructed to install properly spaced staple racks.

Conclusion

We request the School Departure Committee not recommend any departures from the bicycle parking code. The requested departures:

- Are contrary to city policy to quadruple bicycle ridership.
- Are contrary to city policy, funding, and programmatic efforts to increase kids riding to school.
- Are not authorized by the bicycle parking code.
- Are not reviewable by the School Departure Committee.
- Are not needed for an educational purpose.

- Impermissibly redefine “long-term bicycle parking,” effectively providing zero actual long-term bike parking.

Moreover, the proposal may also state in bad faith that the proposed bike racks meet SDOT’s design criteria when the racks do not in fact meet the criteria.

In closing, we recommend Viewlands Elementary supply the required amount of bicycle parking per Seattle land use code. The provision of a safe, secure place for students, parents, staff, and visitors to lock a bicycle at school will support City objectives of quadrupling bicycle ridership; support citywide initiatives which encourage students to bicycle to school such as Safe Routes to School and trainings by Cascade Bicycle Club; and support the first two goals for Viewlands Elementary as established by the School Design Advisory Team (SDAT):

1. Viewlands will be infused with nature, outdoor learning and natural light. Viewlands welcomes ALL!
2. The design will be accessible to students, staff, community and culture.

The provision of bicycle parking is a simple, cost effective measure that provides the required infrastructure to support bicycle trips to school, and portrays a welcoming environment to students and families who travel by bicycle. Commuting by bicycle is a positive way to infuse nature and outdoor learning by supporting independent mobility, improving physical and mental health, and teaching roadway user responsibilities. We urge Viewlands to adhere to these goals and to support students, parents, and staff who choose to ride.

If the School Departure Committee or city staff have any questions about this comment letter, please do not hesitate to contact me.

Sincerely,



Brock Howell
Bicycle Security Advisors
brock@bicyclesecurityadvocates.org
206-856-4788

CC: Councilmembers Debora Juarez and Dan Strauss

Bicycle Security Advisors Board

Paul Buchanan - Vicky Clarke - Bob Edmiston - Lisa Enns -
Brock Howell - Victoria Kovaks - Larry Leveen - Carl Leighty -
Jim Loughlin - Ross Peizer - Mike Rimoin

Sheehan, Maureen

From: Cheri Hendricks <cheri.hendricks@comcast.net>
Sent: Tuesday, September 01, 2020 8:10 PM
To: Sheehan, Maureen
Subject: Viewlands Elementary School Requests for Departures

CAUTION: External Email

I am writing to comment on the departures requests for Viewlands Elementary School.

I have lived approximately 3 blocks from Viewlands Elementary for the past 35 years. Even though it has received system upgrades in the recent past, the existing school building has significant deficiencies, particularly with regard to security, as its configuration allows visitors to enter into student courtyards before approaching the school office for check-in. So I support the replacement of this 60+ year old building.

Building Height: The request for departure for 1' above the allowable height for the parapets is inconsequential in its effect on the neighborhood. The 13' additional height at the mechanical penthouses is a relatively short section of the 10700 block and has been set back far enough from 3rd Avenue NW that it will be minimally noticeable to the neighborhood. I support the approval of this departure.

Parking Quantity (Automobiles): Many schools in our city have little or no on-site parking. This is as it should be, because school sites should prioritize use for learning and play, rather than parking private automobiles that encourage single-occupancy travel.

Viewlands currently has only 4 formal spaces on site, and less than 20 informal spaces. Even if student enrollment doubles over time, the proposed 50 spaces would be adequate as it represents more than a doubling of the available on-site parking spaces. If the City is to encourage other means of transportation, as it does with neighborhood greenways and increased requirements for bicycle parking, then it must concurrently discourage the use of private automobiles by reducing requirements for onsite parking.

I would support the further reduction of automobile parking on-site, so as to allow more site area for student use. In the meantime, I encourage the City to approve this departure from 146 spaces to 50 spaces.

Bicycle Parking (Long Term) Quantity:

I have been an avid cyclist for the past 28 years, so I generally support the city's encouragement of long term, secure covered bicycle parking. I think it is important that adults model good behavior for students by bicycling to school, and it's also important for students to establish good habits when they're young. However, the location of Viewlands along a busy neighborhood arterial does not provide sufficient access via safe streets to expect any but the oldest students to bicycle to school. So the amount of bicycle parking required by the city should, in my view, be limited to that which will serve a reasonable percentage of staff plus perhaps 1/3 of the students. So I support the approval of this departure.

Bicycle Parking (Short Term) Quantity:

Staff and students who bicycle to school will use long term parking, as it will be covered. Only part time staff, parents, volunteers, and visitors would utilize short term parking.

Part time staff who work at two or more schools are most likely to arrive by automobile so they can quickly transition from one school to the next. A few parents may drop off and pick up students via bicycle at the beginning and end of the

day, and throughout the day volunteers and visitors typically number less than a dozen at a time, so 20 short term spaces is likely to be more than adequate. Therefore I support the approval of this departure.

Bicycle Parking Performance Standards:

I own four bicycles and there is not a single one that I would feel comfortable leaving in front of the new school secured only by a lock on a rack, EVEN IF it was directly outside school office windows. School office employees are charged with a lot of responsibilities for attending to the needs of students, staff and families, and it's not their responsibility to also keep an eye on bicycles. Further, the bicycle parking locations currently proposed have not been shown to be directly outside the main office, but are more likely outside of classrooms whose teachers will be focused on students.

I would feel far more comfortable parking my bike within the fenced perimeter even if a change in elevation had to be navigated.

If bike parking must be located on the east side of the school, then the design team should take up the challenge of designing an attractive, secure enclosure that can be readily accessed by students and staff without providing access to the general public. So I do not support this departure request.

Double Sided Changing Image Message Board:

While there is an example image of a sign, there is no departure condition identifying the maximum height or the maximum illumination levels. I would support this departure only with the proposed Departure Conditions a, b, c & d, and provided that the maximum height be limited to 5' above grade, and the maximum illumination levels and glare be defined by the Departure. In addition, I would ask who enforces the times in which the sign is to be turned on and off?

Respectfully,

Date 8/18/20



This FAX transmission contains 1 pages (not including this cover sheet)

To: Name MAUREEN SHEEHAN
Department SEATTLE DON
Company _____
FAX (206) 233-5742

From: Name CHRIS JACKINS
Telephone (206) 521-3288

Notes: ATTACHED: COMMENTS ON
VIEWLANDS DEPARTURES

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August 18, 2020

File Viewlands letter on departures

TO: Maureen Sheehan, analyst
Seattle Dept. of Neighborhoods (DON)
600 4th Avenue, 4th Floor
P.O. Box 94649, Seattle WA 98124-4649
206-684-0302; FAX 206-233-5142
Email: maureen.sheehan@seattle.gov

FROM: Chris Jackins, Coordinator
Seattle Committee to Save Schools
P.O. Box 84063, Seattle WA 98124
206-521-3288

REGARDING: Comments on proposed zoning departures for Viewlands Elementary School Replacement project
Seattle Department of Construction and Inspections (SDCI) project # 3038282-LU

Dear Maureen Sheehan,

1. I have concerns about the Seattle School District's request to allow the Viewlands Elementary School Replacement project to not meet City zoning code with regard to:
 - a. Higher than allowed buildings. (limit is 35 feet; 48 feet proposed) (going from current one story to three stories)
 - b. Less than required on-site parking. (146 spaces required; 50 spaces proposed; "departure" of 96 spaces)
 - c. Less than required long term bicycle parking. (129 spaces required; 80 proposed; "departure" of 49 spaces)
 - d. Less than required short term bicycle parking. (43 spaces required; 20 proposed; "departure" of 23 spaces)
 - e. No locked rooms or cages or lockers for bicycles. (locked rooms or cages or lockers are required)
 - f. A changing image electronic message board, to be located on 3rd Ave NW. (not allowed in residential neighborhoods)

Bright electronic night-time signs are not consistent with residential neighborhoods, and many school neighborhoods have successfully rejected allowing such signs.
2. I oppose granting any of the requested departures.
 - A. Bright electronic night-time signs are not consistent with residential neighborhoods, and many school neighborhoods have rejected allowing such signs.
 - B. The proposed departures from Code are too large, they would harm the neighborhood, and the impacts on the neighborhood are out of balance with the need for the departures. According to the Draft Environmental Checklist:
 - a. 26% (19 out of 73) of the significant trees (6 inches or more in diameter) would be removed, including 1 Exceptional tree.
 - b. The size of the buildings will more than double, from the current 41,100 square feet to 105,000 square feet.
 - c. The height of the school buildings will double or triple, from one-story to three stories.
 - d. A giant amount of vegetation would be removed: "an estimated 187,210 square feet of vegetation."
 - e. A giant 86.9% of the site will be excavated (5.65 acres as a percent of 6.5).
 - f. Likely Impacts on Native cultural resources. The site is classified by the state as "Very High Risk" for containing intact precontact-era cultural resources, it is "likely to have been used Indigenously for occasional resource procurement", but the District concludes that any precontact sites "were ephemeral", even though "No subsurface cultural resources assessments have been conducted". The City of Seattle is named after a Duwamish Chief, yet the District does not explicitly include the Duwamish Tribe among the tribes to be notified.
3. The departures from Code would have significant impacts on the neighborhood that are out of balance with the need for the departures. These impacts cannot be satisfactorily mitigated within the current design. By SMC 23.79.C1.a&b, no departures should be allowed.
4. The DON notices posted at the site indicate that public comment should be sent by September 2, 2020. Yet the DON website indicates that "All School Departure Committee public meetings have been suspended until late September".
5. There is no reason to cut off public comment on Wednesday September 2: please extend the public comment period.
6. Public meetings should be held regarding the requested departures. The Department of Neighborhoods Landmarks Preservation Board website says that the Landmarks Board is holding meetings remotely.
7. Please include me on the list of people to be notified and consulted about the zoning departures, including required public meetings.

Sincerely,



Sheehan, Maureen

From: altosaxc@aol.com
Sent: Wednesday, August 05, 2020 7:32 AM
To: Sheehan, Maureen
Subject: Viewlands Elementary

CAUTION: External Email

Hello Maureen,

My name is Chris Picard and I live at 123 NW 105th Street, a block east of the elementary school. I have looked over the renderings of the proposed new building/parking area and have the following two questions:

1) After a quick look I found no mention of the playground/playfield much of which seemingly will be eliminated with the new building. What is proposed to replace these amenities?

2) For residents living along NW 105th Street, on-street parking on NW 105th near the intersection with 3rd Ave. NW has become a problem. On some days vehicle parking backs up to 2nd Ave. NW making it a difficult and dangerous stretch of roadway to negotiate. There is really only room for one vehicle to get through and any turning movements at the intersection become problematical. A "no parking" designation for that section of NW 105th Street should be considered. The neighbors would appreciate it.

Thank you in advance for considering these comments.

Chris Picard
206-940-6343

Sheehan, Maureen

From: Denise Joines <Denise@wilburforce.org>
Sent: Tuesday, September 01, 2020 4:08 PM
To: Sheehan, Maureen
Subject: Comments on requests for departures for Viewlands Elementary School

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: External Email

Dear Maureen,

I am a long-term neighbor of Viewlands Elementary School in the 300 block of NW 105th Street. The proposed new construction would occur directly across the street from my home and will have significant negative impacts on my current quality of life and home value, not only in the long duration of the use of heavy equipment with its associated noise and pollution during construction, but more significantly with the construction of a building that is completely out of scale to this small-home, quiet neighborhood that is adjacent to Carkeek Park and its associated areas of critical environmental concern.

We have been extremely good neighbors to the school, reporting numerous instances of illegal activities that occur on this SPS property throughout the year to SPD and school security – we have them on speed dial -- (arson, drug use, weapons, vandalism, homeless encampments, graffiti, illegal fireworks, etc), and have and continue to remove untold amounts of trash and garbage throughout the property. We have nothing personal to gain from this assistance to the City, but feel it is our duty as good neighbors to help protect our shared property, especially since SPS does not seem to have the resources necessary to care for or monitor the property itself.

I have also served and volunteered my time on the Viewlands SDAT Team for over a year, attending meetings on my own time to attempt to be a voice for my neighborhood that will be so significantly impacted by this proposed construction. I admire and respect the design team for their creativity in designing this proposed school, but the project is clearly scaled to meet a perceived demand for students' experiences in school and a template SPS has developed, rather than attention to the impacts on the environment surrounding the school.

I remain unconvinced that the many millions of taxpayer dollars that this new construction will require is the best use of these funds. We just recently invested millions of dollars renovating the existing school building after SPS closed the school for several years as a "downsize" to the system. The whiplash from that closure through the renovation to brand new, oversized construction is intense. I question whether our tax dollars would be better spent hiring more teachers, increasing security and maintenance teams so those duties don't fall on neighbors like me, and paying ***all*** of them more than they currently earn rather than sinking a huge amount of resources into the hard costs of construction and ongoing maintenance 1) during a pandemic and 2) with a looming economic crisis as our society experiences the negative impacts associated with COVID-19.

It is for these reasons I oppose the following requested departures from established code, and request a full Environmental Impact Statement for this project. Specifically:

1. Departure for Building Height SMC 23.51B.002.D

"The code allows a maximum building height of 35' above existing average grade plane. SPS proposes a maximum building height of 48' above existing average grade plane for mechanical penthouses and building parapet for a departure of 13'."

This variance will have a significantly negative impact on and is out of scale with the neighborhood. The calculation of the departure at 13' is erroneous because it does not include the first floor of the proposed building in the calculation.

Measuring the school height against the NW 105th St grade plane is arbitrary – why is there no calculation of the departure from the eastern elevation grade plane where the height of the school will be massive and imposing, and will impact park visitors' experience of Carkeek? **The departure in height should be measured at the base of the building to the top.**

The proposal states: "At the primary frontage on 3rd Ave NW, the building is one story which is in character with the scale of the surrounding neighborhood. As the topography slopes down NW 105th Street, the building's roof line remains consistent, but will be screened from the sidewalk and street by existing and new trees." With this statement, the proposal confirms that a three-story building is not in character with the scale of the surrounding neighborhood. Additionally, only the lower portion of the school will be "screened by existing and new trees," and only for 6 months of the year. The remainder of the year, my neighbors and I will, instead of seeing the sky and trees and nature we currently enjoy, will see windows and walls and "mechanical penthouses." What is the ambient increase in noise associated with these "mechanical penthouses? Right now, it is quiet and I can hear wind and birdsong. The impact of the ongoing noise associated with the mechanical penthouses on both the neighborhood and the adjacent park is not addressed ***at all*** in the design. In addition, the impacts of such a large building – the largest construction anywhere on Carkeek Park – has not been adequately studied and needs to be included in an Environmental Impact Statement.

2. **Departure on Parking Quantity SMC 23.51B.002.G:**

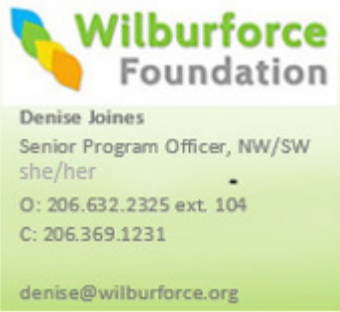
The requested departure on parking spaces is an indication of how this proposed construction is out of scale for both the site and the neighborhood. The city is simply trying to put too big of a school with too many students and too many teachers into this small residential neighborhood with street infrastructure poorly designed for the size of the proposed school. Scale it all back to fit the neighborhood's capacity *and* character.

3. **Departure for Bicycle Parking: comment only:** I support significant increases in secure bicycle parking for the school. However, the street and pedestrian infrastructure around the school is dangerous for bicycles, especially for children. There is little to no sidewalk infrastructure, and where pathways do exist, they are frequently used as parking strips for cars. Think carefully about encouraging elementary school-aged children to ride their bicycles when their options are limited to dangerous and cluttered paths or sharing the roadway with cars. Additionally, the increased traffic such a large school will bring augments the dangers to children.

Thank you for taking my comments. As demonstrated by my long-term commitment to the school and the safety of both the grounds and the students, I care deeply about Viewlands and its environment. I am a professional in the conservation field and understand the environmental risks associate with such a significant project in an ecologically sensitive area. SPS seems to be wanted to cookie-cutter a school of a certain student-population size into both a neighborhood and an environment that calls for a much smaller footprint than what is proposed.

And I really mean it when I suggest that SPS should focus on paying teachers more than spending our tax dollars on huge, fancy new buildings.

Denise Joines
341 NW 105th St
Seattle, WA 98177
206.369.1231



I would like to acknowledge that I live, work, and play on the traditional land of the first people of Seattle, the Duwamish People past and present and honor with gratitude the land itself and the Duwamish Tribe.

Sheehan, Maureen

From: Jack Tomkinson <JackT@UrbanSparks.org>
Sent: Wednesday, September 09, 2020 6:49 PM
To: Sheehan, Maureen
Cc: An, Noah; Juarez, Debora; Strauss, Dan
Subject: Re: Bike Parking Departure Request for Viewlands Elementary School

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: External Email

Dear Ms. Sheehan,

I'm writing regarding the departure request to decrease bicycle parking at the Viewlands Elementary School to below the code requirement. Please do not allow this requested departure.

- Adequate bicycle parking and safe bicycle/pedestrian facilities encourage kids to ride & walk to school, reducing the chaos of cars jockeying to get kids safely to the doors of the school. That's super important for the kids' health and for their engagement in a healthier society and planet.
- Blocking this important engagement is truly destructive and it sends the wrong message to our next generation.
- One of the terribly erosive aspects of the request is to show the citizens of Seattle that codes are worthless, even though the codes cost a fortune to develop and take forever with Seattle process. No matter; they can be thrown aside when someone with someone with a position or connection decides they'd have to think too hard and work too hard to do what the code requires. Nonsense. Aren't governments built to assure trusted standards for society? Seattle's government cannot buckle and expect respect of its citizens.

Let's toil respectfully toward a healthier, more respectful-of-options, lighter-on-the-planet city. Please insist on adequate bicycle parking as required by the code.

Thank you!

Jack Tomkinson

Cyclist to school since 1st grade, 57 years ago.
Advocate of the Burke Gilman Trail missing link for 30 years
Founder of Fremont Peak Park
Impatient citizen of Seattle

Sheehan, Maureen

From: Katey Bean <katey.bean@gmail.com>
Sent: Monday, August 17, 2020 4:20 PM
To: sepacomments@seattleschools.org; Sheehan, Maureen
Subject: Comments on Viewlands Elementary replacement project

Categories: Viewlands Elementary

CAUTION: External Email

Hello,

Thank you for preparing the SEPA for the Viewlands Elementary School replacement project. We are neighbors living across the street from the school, and we have really missed hearing the children playing since the school had to move to online classes! I have a few comments that I hope will be helpful as you continue to refine designs and respond to public comments. We are excited to see the school rebuilt!

In addition to the animals listed, we have also seen coyotes and mountain beaver in the neighborhood around the school. In the past, Viewlands erected protective "tape" around areas in the playground where ground-nesting birds had their nests. I do not know what species of bird these "tape" fences protected, but I suspect they were not listed in the biological assessment. I'm sure staff at the school would be able to tell you which birds nest there.

We are hoping you will protect as many of the native trees as you can to stabilize the soils around the construction site, retain habitat for wildlife, and screen the new school from the Viewlands Trail and Carkeek Park. In particular, we appreciate the Pacific Madrone, Douglas Fir and other conifers along the boundary of the school site. We assume you will replace any trees removed at a ratio consistent with the Seattle Municipal Code, and that the replacement trees will be native. We especially value native conifers to blend with the character of vegetation in Carkeek Park.

We are excited to read that the Seattle Bike Master Plan will include a protected bike lane on 3rd Ave NW. That is much needed! So many cyclists travel on 3rd Ave NW to get to the quieter residential streets from 101st Place, where there are bike "sharrows" today. A protected bike lane would be much safer for people of all ages to enjoy cycling to get to school or Carkeek Park.

We are very hopeful that the plans will include street trees on 3rd Ave NW. Trees would help shade the roadway and sidewalks to keep temperature cooler around the school. They also help pedestrians feel safer next to 3rd Ave NW, which is a minor arterial. I understand that trees may conflict with the desire to have pick-up/drop-off along the curb on 3rd Ave NW. In that case, could they be planted along the back side of the sidewalk instead?

We are glad to see that bike parking is included in the project; however, it does not seem like the bike parking is conveniently located relative to the protected bike lanes on 3rd Ave NW. Could you please clarify that access for cyclists? Are they supposed to turn left down NW 107th Street, and then cross the parking lot to reach the bike parking? If so, I think this poses safety concerns for the children who might want to ride bikes to school. I hope you will take a look at this, with children in mind, and locate the bike parking in a spot that can be easily accessed

without crossing the parking lot or mixing with pick-up/drop-off traffic. Perhaps a location off NW 105th St would be more suitable?

We understand that many staff will wish to drive to their jobs at the school, and we appreciate that the parking lot would be at a lower elevation relative to 3rd Ave NW to help tuck it out of view from the roadway. Will trees be included to shade the parking lot and reduce the potential for creating a heat island? We urge the school to consider using swales to detain and filter stormwater runoff from the new parking lot. The swales in the neighborhood (noted in the report) are so beautiful and appreciated, given our proximity to Piper's Creek. Please consider using natural drainage wherever possible to enhance the "green" of our community, slow water, and help it infiltrate before reaching the creek.

While we're glad to see the school is being built to accommodate future solar, we urge you to install solar by the time of opening, rather than delay it. We have solar panels on our home, and they are wonderful! In addition to generating power, they have kept our home cool during these hot summer days. It's been a wise investment for us, and we think the school would benefit from the savings in electricity costs over the long term. In addition, the district can help the younger generation learn about sustainability!

We have also reviewed the "Departures" document. In general, we do not have concerns with the requested departures, except for the digital message sign. We are concerned that the sign will be a distraction to traffic on 3rd Ave NW and a nuisance to neighbors living on the east side of the street. We think the school should stick with a sign that is not illuminated at night and does not include changing or flashing messages. It seems very out of character with the natural beauty of the park and disrespectful of the neighborhood. We urge you to reconsider this element of the design, and install a sign that is compatible with the intent of the city code.

Again, we are grateful that the district is investing in our neighborhood's elementary school! It will be so nice for the children to have a new school building in which to learn, and we look forward to hearing their voices again when it is safe for them to be there.

Best wishes,

Katey Bean

Sheehan, Maureen

From: Beers, Kristen C <kcbeers@seattleschools.org>
Sent: Friday, August 21, 2020 11:46 AM
To: Sheehan, Maureen
Subject: FW: Viewlands Elementary Departures Public Comment

Categories: Viewlands Elementary

CAUTION: External Email

I'm sorry that sent before I was finished. My mistake. I'll add to my comments below.

From: Beers, Kristen C
Sent: Friday, August 21, 2020 11:30 AM
To: Maureen.Sheehan@seattle.gov
Subject: Viewlands Elementary Departures Public Comment

Dear Ms. Sheehan,

I am writing as a neighbor, assistant teacher at Viewlands, and a member of the SDAT committee regarding the departures for the rebuilding of Viewlands Elementary.

First, there was a concern over the parking lot only holding 50 spaces. This amount of parking would be enough for our staff with our current number of students, but would increase when the school would be at full capacity at 650 students. However, currently, we have only a very small, sometimes muddy, dirt parking lot with overhanging tree limbs that have dropped in thunderstorms. We are thrilled to have at least 50 safe spaces for cars, including ADA spaces for those that need it. We did not have these special spaces before. There is plentiful on street parking if people are willing to walk a block or two. I live a couple blocks away, and there is fine, side street parking that will be available as long as people parking respect the neighbors mail boxes etc. This inclines me to feel safer in our neighborhood because with more people around, I feel we see less crime. Also, the smaller lot gives us more property devoted to outdoor classroom space, and play space. We would not want a huge parking lot taking up valuable environment that the neighbors and students could be enjoying as a playground.

Second, there is a departure for the height of the school. The architecture firm was very creative in using the steep grading of the property to hide the building. From the street, it will look like a one story building. As you enter, the building becomes deeper and will become a three story building. But the view from the front will not feel imposing. I do wonder if any of the height of the Mechanical highest story will impede any neighbor view of the Olympics though.

Third, there's a departure for bike rack what space. We did not have any spaces before so this is a huge improvement. Plus it will all be covered. It's a vast improvement to we presently have.

Fourth there was concern that the building footprint increased. It's remarkable to me that it didn't increase more. The student body will increase from approximately 350-650 but the footprint size will only increase from 40% of the property to about 56%. That seems reasonable to me. In the meetings we were very aware of our building space, every inch having a purpose so that we could maximize our time outdoors. The building plan is so thoughtfully planned so that the classrooms would all look out to trees and see light and trees. The plan having the three stories so that classrooms are placed more closely together so that specialists would be able to quickly serve the student body without wasting time. I'm impressed with the current plan, the thoughtful layout of space, the awareness of the environment around us, and the reasoning for the departures.

Thank you so much for taking this in consideration,
Kristen Beers

Sheehan, Maureen

From: Lesley Pfeifer <lrp@mixx96.com>
Sent: Monday, August 24, 2020 8:12 PM
To: SEPAcomments@seattleschools.org; Sheehan, Maureen
Subject: Comments and requests on rebuilding of Viewlands Elementary School

CAUTION: External Email

To the attention of:
Fred Podesta, Chief Operations Officer
Mauren Sheehan, Seattle Department of Neighborhoods

Dear Fred Podesta and Maureen Sheehan,

I am writing to request the following:

1. I am requesting that you extend the comment period for Viewlands Elementary School rebuilding project, and expand the “comment” process in a way that will provide the community with a forum to learn more so we can comment thoughtfully and with more knowledge.

I am alarmed and disappointed that the first notice I received about rebuilding Viewlands Elementary School came last week as a postcard in the mail. The postcard refers me to a 92-page presentation. The schematics look like this project is already far along in the planning process, but you are only now soliciting community input. I feel ambushed, and besides not having enough time to read and understand the implications of this massive project, I am dismayed that you are only soliciting written input without supplying some forums for learning and understanding this project.

To responsibly gather public input, I think you need to hold some meetings to explain your plans, answer questions and allow for informed response. I know this is challenging during the current health pandemic, but you could hold Zoom-style “Town Halls” that have question and answer capabilities.

This is a very large project which would have a tremendous impact on the neighborhood, the environment, the increase in traffic (in an area that is already congested), and the huge shift in what learning would look like for our children (an elementary school designed for 650 kids, seriously?). You need to not push this through without more info from stakeholders.

2. I am requesting that you complete a thorough Environmental Impact Statement/Review before this project moves any further.

As a layperson, it looks like a lot of the info in your 92-page presentation on the wildlife, Piper's Creek and the water drainage/flooding is skimpy and inaccurate. It's important to have a good understanding of the impact this project will have on Piper Creek and the eco-system of the ravine and Carkeek Park. For example, the wildlife I have observed in the neighborhood is far more extensive than what you mention in your planning document. Storm water runoff and drainage in this area is delicate and a lot of work has gone into protecting the ravine, creeks, and neighborhood. Given the proximity to the ravine and creeks, it's important that a project this large not destroy this.

Please conduct a proper Environmental Impact Statement and review.

Additional comments:

Not long ago, millions of dollars were invested in renovating Viewlands Elementary. I know most of the funding went toward repairs for the damage that was done during the years the school was unfortunately closed. Also,

parents, students and the community raised a great deal of money recently to upgrade the play area. With this new rebuild plan all of that would be ripped out and destroyed.

As a parent of a recent SPS graduate, I am also concerned about the learning environment of a mega (650 student) K-5 school. Yes, it would save the school district money on utilities and staffing, but studies have shown that excessively large schools (for young children) are a terrible learning environment, and that teachers have a harder time getting the support that they need. It is not worth the savings on utilities and admin staff. I understand that Viewlands needs to expand to accommodate the growing neighborhood, but does this neighborhood warrant a school of that size?

Also, thinking of size, why does the footprint need to be so big? Have you considered underground parking? Why do you need three stories instead of two? I would like more explanations, and actual height details than are in the report.

Are you rushing this project because you are worried about funding during this economic and health pandemic? If so, that is not a good reason to push through a project of this magnitude.

We are in the middle of a pandemic, and this is a very large project which will have tremendous impact on the community for years to come. This feels rushed and done in secret (again, why are we just learning about this now?).

Please take your time, and do this project carefully and correctly.

Again, extend the public comment period and expand how you reach out to all concerned parties (community, parents, teachers, Carkeek park, etc.). And two, have a complete and responsible Environmental Impact Statement and review done.

Thank you, Lesley

Lesley Pfeifer
329 NW 105th St.
Seattle, WA 98177
Phone: 206-669-3970

Sheehan, Maureen

From: Peggy Gaynor <peggy@gaynorinc.com>
Sent: Wednesday, August 26, 2020 10:49 AM
To: Comments Sepa
Cc: Sheehan, Maureen
Subject: View lands Elementary School Replacement Project - Draft SEPA Checklist comments from Peggy Gaynor
Attachments: Viewlands School SEPA_PGaynor Comments.pdf

CAUTION: External Email

To: Fred Podesta, Chief Operations Officer, Seattle Public Schools
CC: Maureen Sheehan, Seattle Department of Neighborhoods

Please find attached my comments on the Draft SEPA Checklist for Viewlands Elementary School Project. Confirmation of the successful receipt and downloading of the attached pdf comments document is requested. Thanks.

Summary re: Departures requested by SSD for Viewlands Elementary School Replacement: More detail reasons re: my recommendations below are found in the attached document commenting on the Draft SEPA Checklist.

1. Building Height - DENY departure for building height to 55 feet (3 - stories).
2. Parking Quantity - ALLOW departure for parking quantity (due to site size / constraints).
3. 4. & 5. Long Term and Short Term Bicycle Parking Quantity and Standards - ALLOW departures for bicycle parking and standards.
6. Electric Message Board - DENY departure for electric message board (incompatible with neighborhood.)

Thank you for this opportunity to provide my comments and input on this consequential school replacement project.

Peggy Gaynor, FASLA
Principal, GAYNOR, Inc.
206.782.3277 office / 206-783-2117 cell

creating environments through landscape architecture and art

**Viewlands Elementary School Project
Comments from Peggy Gaynor**

**Draft SEPA Checklist
8/26/20**

To: Fred Podesta, Chief Operations Officer,
Seattle Public Schools
P.O. Box 34165, MS 22-332
Seattle, WA 98124-1165

From: Peggy Gaynor
319 NW 105th Street
Seattle, WA 98177
206-782-3277 office / 206-783-2117 cell

After reviewing the draft SEPA Checklist for Viewlands Elementary School Replacement Project, my general comments and concerns are listed below. Specific comments on SEPA Checklist information follows the general comment section.

Because this has been the first public communication regarding this project, with no other community outreach or input during the design process, I also requested on 8/24/20 an extension to the comment period for the draft SEPA Checklist (and Departures requested) for Viewlands Elementary School Project.

Thanks for this opportunity to comment on the Viewlands School project. Please include me on all future communications related to the project, which I hope will include meaningful public outreach and input into its design.

General Comments / Concerns:

1. Proposed scope of Viewlands School replacement including size of building, amount of impervious surfaces, on-street parking/loading impacts, and concerns with environmental impacts during and after construction should result in a SEPA Checklist Determination of Significance, triggering the need for more information and assessment through an Environmental Impact Statement (EIS) for the Viewlands Elementary School Project.
2. The size and scale of the building and overall impervious surfaces proposed are too large for this site, its environmentally-sensitive environs and surrounding residential (SF 7200) neighbors. Carkeek Park, with its 216 acres of native habitat, streams and Puget Sound shoreline, effectively wraps around the north, west and south sides (park extends behind homes on NW 105th).
The neighborhood is rich in diverse native wildlife, including unique species such as short-tail weasel, mountain beaver, Pacific jumping mice and garter snakes, to name a few. The entire area around and including the school grounds (especially Viewlands Cascade natural drainage system and homes south of NW 105th) is a de facto wildlife haven and corridor.
3. Why nearly double the student population to 650 students for this school? 400 – 450 students would be a much better fit with the site and community, while providing for modest enrollment increase over time. A compromise needs to be reached that balances community and environmental concerns with SSD student enrollment projections.
The current (before Covid-19) student enrollment is stated to be approx. 385. When the school was closed 12 – 15 years ago it had a student population of 200 or so. In my limited research, typical elementary school size is recommended to be 300 – 400 students. The average

elementary school size listed in reports for Washington State is 425 – 450.

4. Consider providing safer on-site driveway with drop-off / pick up zones for parent/student use. Could be accessed from NW 4th and/or NW 3rd Avenues and be associated with proposed parking lot in NE corner of site.
Even at 385 students, adjacent on street parking near the school is maxed out on 3rd NW, NW 105th and other surrounding residential streets, during peak times of student drop-off and pick-up.
I have observed dangerous conditions. Parents with students park on both sides of 3rd NW and exit vehicles into its busy traffic lanes. They cross mid-block, not at intersections with crossing guards.
NW 105th is a residential dead-end street. During school drop-off and pick-up, cars are parked on both sides of NW 105th despite “No parking during school days” signage on the south side. Parents make dangerous U-turns in the middle of NW 105th, park in and block driveways and mailboxes, and other general chaos.
5. The proposed playground space in the NW site area is too small for any size elementary school. One of the best features of the existing school has been the size of its playground / playfield open space. In addition, the PTSA just recently completed major playground and accessible pathway improvements on the lower playfield. The school's playground/ playfield is also used extensively by the community and is a de facto neighborhood park.
Prior to portables taking over the asphalt playground after the school's re-opening, the site was approx. 2/3 playground/playfield and 1/3 school building / parking lots. The schoolchildren (and community) use every inch of this open space. Proposed school replacement would reverse that percentage coverage, with site plan showing 2/3rd or more of the site devoted to school building / parking lot and other paving, with 1/3 or less dedicated to playground. This is unacceptable.
6. Given proximity to creeks and Puget Sound, stormwater runoff from the school site should be 100% detained, treated and infiltrated on the site and not allowed to contribute to piped stormwater system and/or overflow into natural water bodies or constructed swales. Possible exception would be for the largest (100 – 500 year) storm events.
Soils in the area and on site generally have a high infiltration rate. An average 50% of storm flows are infiltrated within the adjacent Viewlands Cascade swale, with smaller storms infiltrating 100%. Drainage facilities for the school should take advantage of these favorable soil conditions and infiltration rates to mitigate site runoff on the site.
7. The proposed school replacement seems based on a pre-Covid-19 world. With Covid-19, virtual classrooms and ongoing re-imagining of how we educate children now and in future, shouldn't this current proposed design be re-examined and re-considered? Putting such a large number of little kids in one place seems out of step with public health concerns.
8. Addressing my above listed comments, efforts should be made to reduce the proposed student enrollment number and subsequently decrease / consolidate the building and parking lot footprint as much as possible. A smaller building/parking lot footprint would address many concerns regarding overall impacts to the site and surrounding environs/community, including on-street parking/loading, impervious surface coverage/runoff quantities and treatment, playground/playfield size, native wildlife habitat and other environmental and community

impacts.

Considerations for reduced school size and impacts include:

- School building should be 2-story high maximum, not 3. The proposed departure from zoning code for building height should be denied.
 - Sensitively merge the building layout into the sloping site. Take advantage of nearly 40 foot elevation change on site to create “earth-sheltered” or below-grade bottom floors that daylight on 1 or more sides, opening onto playground or other open space. This appears to be the case on the current site plan to some extent, but perhaps the concept can be pushed further to reduce the perceived scale of the building, be energy efficient and perhaps improve view corridors through the site.
 - Some if not all staff parking could be located under a 1-story portion of the school building. Although 50 parking spaces may not comply with zoning code, it is more than double what is provided on site currently. A parking lot meeting zoning code (146 spaces) would be so large as to begin to dominate the site. Thus the requested departure for on site parking quantity should be allowed, as well as departures for bicycle parking quantities and standards. (I have not observed much bicycle traffic during school days at Viewlands School.)
 - Omit proposed electronic message board. This element is not in keeping with the community's scale and character. A departure for the electronic message board should be denied.
9. Summary of Desired Design Principles: Because there has been no community outreach thus no opportunity to date for design input, I suggest the following principles guide the Viewlands Elementary School project.
- Be transparent and communicative with the community, including providing a public process for input into the design process.
 - Be respectful of and sensitive to the site and surrounding natural environment and residential neighborhood.
 - Strive for if not achieve architectural LEED Gold building and site-sensitive, sustainable site plan following landscape architectural SITES guidelines.
 - Provide solar panels on building roof, as well as passive solar design, for maximum energy independence and efficiency.
 - Provide on-site short-term parking and loading for parents to improve safety and reduce on-street parking impacts.
 - Minimize footprint of building and impervious surfaces. Be creative to reduce overall impacts, as well as improve aesthetics and views.
 - Treat 100% of site runoff on site, especially through infiltration.
 - Protect and preserve on site exceptional tree # 348 - Picea pungens (Colorado spruce). At 100 – 150 feet tall, this is the largest existing conifer within the schoolground fence, and an important habitat tree for the local population of bald eagles, hawks, owls and other birds.
 - Consider transplanting exceptional tree #301 – Arbutus unedo (strawberry tree), rather than removing it.
 - Protect and preserve all native plants outside of current schoolground fencing, including all vegetation associated with SPU swales.
 - Preserve existing layout of schoolground perimeter fence, except where it intrudes into mapped ECA buffers. Move perimeter fence out of all ECA riparian and wildlife buffer

- areas.
- Protect and preserve all Viewlands Cascade and Broadview Green Grid swale improvements, with no disturbance or changes including to street frontage. Be aware that Viewlands Cascade sidewalk is a heavily-used pedestrian access to Carkeek Park as well as an outdoor classroom for Viewlands School.
- Replant with 100% drought-tolerant native plants. (Some native-compatible plants OK.)

Specific SEPA Checklist Comments:

B.1.g. Earth: 16% increase in impervious surface coverage (from 40% to 56%) is too high. Reduce impervious surface coverage as much as possible.

B.2.a. Air: Disagree with conclusion that emissions would only increase slightly. With projected increase of 500 more vehicle trips per day due to increased school population, localized emissions around the school may significantly increase.

B.3.a.1 Surface Water: There are two perennial streams (tributaries to Piper's Creek) located within Carkeek Park ravines north – northwest of the school and south of the school (and homes along NW 105th.) Piper's Creek flows through Carkeek Park to Puget Sound. Figure 3 needs to be corrected to show the entire length of both tributary streams and where they connect to Piper's Creek. Information as shown on Figure 3 currently is incomplete and misleading. Due to proximity to natural areas and Puget Sound, it is imperative to provide correct and complete watershed information in this section.

To update SEPA Checklist information:

Viewlands Cascade Natural Drainage System (called out as Viewlands Swale in SEPA Checklist documents) was proposed by Peggy Gaynor and designed by GAYNOR, Inc. in collaboration with SPU engineers and Viewlands School administrators. Construction was completed in 2000. All native planting was done by Viewlands School students, SPU & school staff and community volunteers. Viewlands Cascade became the first prototype for SPU's cascade-style SeaStreets and was one of Mayor Schell's Four Corners Millennial Creek Projects. Prior to 2000, the swale was an asphalt-lined ditch with high velocity flows that would over-shoot the outfall slant drain and cause severe steep slope erosion and property damage in Carkeek Park.

B.3.a.6. Discharge to Surface Waters: Please confirm that no treated or untreated site runoff will discharge to SPU swale facilities - Viewlands Cascade or Broadview Green Grid.

B.3.c.1. Runoff Collection / Disposal: Where are the bioretention cells located on the current proposed site plan? Please call out, including square foot size, on plans.

Very concerned about urban runoff discharging to Piper's Creek and Puget Sound. Piper's Creek is already under stress due to urban runoff pollution and flashy flows. Ditto for Puget Sound. Discharges to SPU storm drain system should be minimal and limited to only the largest storm events. Runoff should be treated and infiltrated on site to the greatest extent possible. Soils in the area are generally sandy and have high infiltration rate. Adjacent Viewlands Cascade infiltrates 50% or more of stormwater flowing through it. Stormwater runoff piped to Viewlands Cascade is from up to 75 acres.

B.3.c.2. Waste Materials entering ground or surface waters: Very concerned about contaminated runoff during construction polluting groundwater and/or creeks. Please provide more detail regarding

specific treatment method(s) and where discharge would be directed after treatment. No discharges should go into the Viewlands Cascade or Broadview Green Grid swales that are piped directly to Piper's Creek, or into groundwater.

4.b. Vegetation removed: Consider transplanting exceptional Tree #301 - *Arbutus unedo* (strawberry tree), instead of removing it. Strawberry tree is native compatible, drought-tolerant and this large specimen is valuable. Recommend Big Trees, Inc, Snohomish, WA, 1-360-563-2700 for transplanting estimate.

4.c. Staging within wildlife habitat / corridors: This section is misleading. Staging is part of construction and is disruptive and damaging. No staging should be allowed in ECA mapped wildlife corridors and buffers. Any disruption to vegetation in wildlife buffers must be mitigated and revegetated with native species.

4.d. Proposed Landscaping: Revegetation of school site and adjacent right-of-ways should be primarily done with drought-tolerant native species and suited to site-specific upland conditions.

5.a. Animals observed on or near the site: This section is incomplete and misleading. I have observed the following species on or around Viewlands School.

Reptiles: Northwestern and/or common garter snake, including over-wintering and nesting in gravel backfill behind sidewalk seating wall associated with Viewlands Cascade swale.

Birds: Area is used extensively by raptors including local bald eagles, redtail hawk, Cooper's hawk, sharp-shinned hawk, great horned owl and barred owl. Diversity of songbirds, in addition to those already listed in SEPA Checklist, include several warbler and sparrow species, pileated woodpecker, red-bellied sapsucker, downy woodpecker, hairy woodpecker, black-headed grosbeak, cedar waxwing, purple, house and gold finch, vireo species, hermit and other thrushes, red and yellow-crowned kinglets, chestnut-backed chickadee, bushtit, Anna's and rufous hummingbirds, brown creeper, red-breasted nuthatch, spotted towhee, Oregon junco and more. Swift and/or night jar species have used existing school roof for nesting. Kildeer have used lower playfield for nesting.

Mammals: Coyote, raccoon, opossum, Townsend chipmunk, Douglas squirrel, Eastern gray squirrel, mountain beaver, short-tail weasel, white-footed deer mouse, vole species, mole, Pacific jumping mouse, little brown or other bat species, eastern cottontail rabbit, occasional rat species.

5.b. Threatened or endangered species: Although not specifically listed, Pacific jumping mouse is an uncommon species in urban areas. It is thriving in Viewlands School area due to substantial riparian habitat (including constructed swales) and other native habitat types it prefers.

5.d. Proposed Measures to preserve or enhance wildlife: Disagree with conclusion of this section. Loss of open space, including "degraded lawn" will impact wildlife use in and around the school site. Mitigation should include re-vegetation of open space areas west of the school outside schoolground fence and within the fenced schoolgrounds with diverse native species providing food, cover and nesting habitat for wildlife.

5.e. Invasive species: Raccoon and opossum are native and not considered a problem in the area. Eastern gray squirrel is a problem as it is destructive to native vegetation and bird species, particularly

while nesting. The neighborhood currently does not have a rat issue.

6.a. Energy Use: Install solar panels on proposed school building, instead of just planning for solar readiness.

6.b. Energy conservation features: Applaud all listed energy saving features, but please install solar panels on proposed building roof instead of planning for future installation.

In addition to energy conservation features, please consider “Dark Skies” concepts and compliant outdoor lighting fixtures to avoid light pollution and glare. The area is used extensively by nocturnal birds (owls) and mammals (bats, Pacific jumping mouse) that could be affected by light pollution. Neighbors have also had problems with schoolyard lighting causing glare and light “trespass” into private homes and yards.

7.a.5. Measures to reduce or control environmental health hazards: Existence of asbestos, lead, mercury and possibly other hazardous materials in current 1954 school building and its removal during demolition is of great concern to neighbors. Please share detailed site-specific pollution prevention and control plans with adjacent neighbors when available.

8.b. Land Use / Working farm: Site history additional information should be added here. Prior to 1954 Viewlands School construction, the site was pastureland for a dairy farm. We have 1940-era photos looking north from our 319 NW 105th Street address that show dairy cows grazing on the sloping site (no terraces.)

8.d. Structures demolished: Viewlands School PTSA recently completed major play area and accessible trail improvements in the lower playfield on site, funded by DON grants for the most part. Proposals for the site should consider ways to salvage and re-use as much of the play area improvements as possible.

8.h. Critical Areas: Strongly opposed to proposal to allow construction staging within ECA mapped riparian and wildlife habitat corridors and buffers. This site and its surrounding natural areas support a large, diverse wildlife population as previously listed in these comments. Construction staging is very disruptive and generally involves clearing, heavy diesel- or gas-powered equipment access, soil compaction and the like. Staging activity is thus a major impact on wildlife use and could contribute to erosion and hazardous materials flowing to nearby Piper’s Creek system (especially tributary Stream A.)

8.i. Number of People in Project: As previously stated in these comments, a facility housing 650 students and 72-83 school staff is too large for this environmentally-sensitive site and community. Strongly recommend a compromise to reduce maximum number of students in future at Viewlands School to 400 – 450.

8.j.&k. Displaced People/Mitigation: Disagree with conclusion of these sections. Current Viewlands School students and staff will be displaced during construction. Where is the SSD planning to move the current school population? How will this disruption be mitigated?

8.l. Existing Land Use Compatibility: Disagree with conclusion of this section. Although the proposal is to replace an existing school with a new school building, the existing school building

comprises 1-story buildings and portables. The proposed building varies from 1-story up to 3-stories and has nearly double the footprint on site. This is not compatible with existing land use and zoning code. A departure from building height limits for SF 7200 should NOT be allowed.

Attached Figure 2: Proposed Site Plan does not provide enough information to understand the full scope and scale of new structures. Due to the screening on the attached plan, it is very difficult to see open space, landscape and playground features. On site bioretention pond(s) may be shown but not visible and are not labelled. Conclusion: More information and detail is needed on design proposals for Viewlands School replacement, including a more complete and readable site plan, typical sections through the site, building elevations, perspective views and the like.

10. Aesthetics: As previously stated in these comments, there is incomplete information provided regarding Viewlands School replacement. As such it is disingenious to conclude that there are minimal impacts to aesthetics and views (including E-W AND N-S views) across the site, since not enough information is provided to confirm that conclusion.

Looking at the only site plan information provided (Figure 2: Proposed Site Plan), aesthetic and view impacts could be substantial, particularly for users of Carkeek Park Viewlands Trail entrances on NW 105th and NW 107th, as well as for all adjacent neighbors on 3rd NW, NW 105th and NW 107th.

11. Light and Glare: As previously stated in these comments, Dark Skies concepts and compliant exterior light fixtures should be incorporated into the lighting design for Viewlands School replacement. Light pollution would be a major impact on area wildlife and residential neighbors and should be avoided. Supportive of lights being on timers and the site being mostly dark at night.

12. Recreation: Disagree with conclusion that proposed Viewlands School replacement does not affect or displace existing recreational uses. The section is incomplete and misleading regarding existing recreation on and around the site. This section needs extensive corrections and more information.

Limiting existing recreational use to Carkeek Park-related trails ignores the fact that the existing schoolgrounds and facilities (play areas, basketball hoops, playfield, etc.) currently function as a neighborhood park and playground that is used extensively by students and the surrounding community. Due to construction and proposed reduction in size of playground / play area (contained in much smaller NW area of site), the impacts to on site recreation uses by both students and community members is high. Impacts to Carkeek Park trail users could also occur, mainly during construction.

14. Transportation: As previously stated in these comments, Viewlands School-related on street parking and loading particularly during drop-off and pick-up peaks has been a long-standing problem on surrounding residential streets (dead-end portion of NW 105th in particular.) Although SDOT has made recent improvements to 3rd NW to include curb, gutters, sidewalks and parking/loading zone, even those improvements are overwhelmed during daily school transportation peaks.

More time is needed to digest the attached Transportation Report from Heffron Transportation, Inc. More emphasis needs to be placed on solutions that reduce on street parking impacts and increase safety during peak times. With increase of up to 500 trips to day projected, transportation issues, already a problem, will exacerbate traffic impacts on the community and along with environmental impacts, should trigger a DS and EIS for the project.

Although there is some discussion of parking and loading on the north side of NW 105th, east of the current service driveway, I cannot find any discussion about the future of parking/loading in this area. Similarly the south side of NW 105th Street is currently signed for "No parking during school days" but

there is no discussion whether that signage will remain or not. Please provide additional information on whether current parking/loading on north side of NW 105th east of service driveway and “No parking on school days” signage on south side of NW 105th will remain.

Viewlands Cascade swale has wheel stops installed to allow for street runoff from NW 105th to enter the swale. Strongly recommend that no frontage changes be made on north side of NW 105th west of the service driveway. Similarly, no street edge improvements to south side of NW 105th street in front of residential homes should or need to be made.

Suggestion: Consider adding on site loading zone driveway for parent/student use that addresses peak travel trip and safety issues previously described. Access to this on site driveway could be from NW 4th and/or NW 3rd, feature one-way traffic with up to two curb cuts for entrance and exit, and could be double loaded with parking/loading on both sides of the driveway. The driveway could be associated with or added to the proposed NE corner parking lot / school bus loading zone.

Figure 1: Vicinity Map. Aerial used for Figure 1 is out of date and does not show all current existing site features, including more portables and recent PTSA playground and accessible path improvements on lowr playfield.

Figure 2: Proposed Site Plan. As previously stated in these comments, this plan is incomplete (and does not include labelling of all features). The plan is difficult to read due to screening of site and landscape features. More detail is needed to understand the full scope and scale of proposed buildings and site elements, including typical site sections, building elevations, perspective views, etc.

Figure 3: Study Area Streams, etc. As previously stated in these comments, this plan is incomplete. There are two tributaries to Piper's Creek within Carkeek Park ravines to the N-NW and S (behind existing homes on NW 105th Street) that are included within the aerial. In addition, this figure should show entire tributary stream reaches from headwaters to confluence with Piper's Creek, as well as show the outfall pipe for Viewlands Cascade Swale and its connection to Piper's Creek. The receiving natural water body for the area (and site) is Puget Sound, thus it is imperative that greater watershed information be included in all SEPA Checklist related documents.

Sheehan, Maureen

From: Ryan DiRaimo <ryan.auroralictonuv@gmail.com>
Sent: Tuesday, August 04, 2020 3:58 PM
To: Sheehan, Maureen
Subject: Viewlands Elementary School Proposed Departures

CAUTION: External Email

Maureen,

Thank you for taking comments on the departures. Overall, I am in support of the proposed design and their departures and wanted to outline my comments below:

Departure 1: Building height & zoning setbacks. Support!

I completely support departures from code. Zoning codes are full of unnecessary setbacks and modulations that only add cost & thermal exposure to buildings and constrain design teams' ability to make a compelling project.

Departure 2: Fewer car parking spaces. Support!

The city should not have a single parking minimum anywhere in the city.

Departure 3: Fewer long term bike parking spaces. Tentative Support.

If a secure space is provided, then the 89 bike spaces will likely be used. E bikes are currently flying off the shelves locally and nationally. We need to encourage alternative transportation.

Departure 4: Fewer short term bike parking spaces. Tentative Support.

I can generally support this departure if the after hours use of the long term bike parking is available for parents attending after school events or meetings. Otherwise, I feel compliance for the city's minimum should be met.

Departure 5: Bike parking standards. Oppose.

The need for long term bike parking security is necessary. Without it, the incentive is to worry your bike will be tampered with or stolen, and with more people curious about buying expensive e-bikes it could discourage their use without secure facilities.

Departure 6: Double sided sign. Support.

Overall this project looks great and I am glad the investment is being made into one of North Seattle's elementary schools. If the design review board feels compelled to make suggestions or oppose a few of the departures, I recommend making them a condition of approval and allow the project to progress to the building permit without additional Design Review meetings which only cause more expensive delay.

Thank you,
Ryan DiRaimo



Seattle

School Traffic Safety Committee

September 2, 2020

To Viewlands Elementary School Departure Committee
c/o Maureen Sheehan, Maureen.Sheehan@seattle.gov

Re: Viewlands Elementary School Departure Requests # 2, 3, 5, & 5

The Seattle School Traffic Safety Committee (STSC) is an advisory committee established by the City of Seattle with members from the Seattle Department of Transportation (SDOT), the Seattle Police Department (SPD), Seattle Public Schools (SPS) and City-appointed community representatives.

The STSC strongly supports the announced plans for the much-needed expansion and replacement of Viewlands Elementary School.

We are pleased that the plans presented in the Departure Request ¹ incorporate several important positive changes that have been made in response to our comments on earlier schematic plans, as follows.

Although we strongly believe that school entrances and their plazas should be at major intersections rather than midblock to encourage kids to cross there rather than to dangerously cross midblock (especially on major arterials) and so that more block faces are near the entrance to distribute drop-off traffic, we are very happy to see that the entry plaza has been moved closer to the corner of 3rd Avenue NW & NW 105th Street. The connections to that corner now look much more conducive to pedestrians. And we are especially gratified that the childcare and preschool entrance is at the corner. We would encourage SPS to continue to strengthen the connection between the corner and the school entrance as the design details continue to develop.

We are pleased that school bus loading has been switched to the parking lot. That eliminates the need to tear out and relocate a new and perfectly good sidewalk on 3rd Ave. More importantly, it allows for a much more dispersed and more easily encouraged drop-off pattern along 3rd and will reduce its associated traffic on NW 107th Street.

We have several specific comments and suggestions about several of the departure requests, as follows.

¹ Viewlands Elementary School Departures Presentation, August 2020, by Mahlum Architects, accessed at https://www.seattle.gov/Documents/Departments/Neighborhoods/MajorInstitutions/Viewlands%20Elementary/20200729_Viewlands_Departures.pdf

Underlying most of these comments is our understanding of the benefits of, and importance of encouraging, active transportation to school (walking, biking, and rolling).

Benefits of Active Transportation

Walking, biking, and rolling to schools by students, teachers, staff, and parents decreases the traffic and parking concerns near schools and helps reduce the cost of school busing. It lowers their impacts on both the immediate neighborhood and the City and its transportation infrastructure in general.

More importantly, walking, biking, and rolling to schools helps students learn and has life-long effects on them. School is where kids learn many skills and habits that will stay with them over their entire life. There is a large volume of literature about the benefits of kids walking or biking to school both during school and later throughout their lives. Some typical excerpts:

*“There is a growing body of evidence showing a positive relationship between physical activity and measures of academic achievement, including grade point average (Kontomaa et al, 2013), rate of learning (Hillman et al., 2009), and classroom behavior (Davis and Cooper, 2011), as well as cognitive, social, and motor skill development and ability (Active Living Research, 2015)”*²

*“The trip to school is a crucial opportunity for children and youth to get regular physical activity by walking or bicycling. Walking and bicycling not only create healthier students, but also support focused learning and academic performance. In order to achieve these benefits, walking and biking to school need to be convenient, comfortable, and safe.”*³

*“... kids who cycled or walked to school, rather than traveling by car or public transportation, performed measurably better on tasks demanding concentration, such as solving puzzles, and that the effects lasted for up to four hours after they got to school”*⁴

The availability and convenience of bicycle parking influences the choice of whether or not to bike to school. It makes an implicit impact on the students’ psyches to see the prominence that it is given and to see peers using it.

A recent study of bicycle use in 15 schools concluded as follows:

*“Factors that contribute to student cycling at the individual school level are varied and complex. In this study, **the size of bike parking, cycling promotive school policies, and participation in grant-funded promotional programming emerged as clear distinctions between [schools that had higher rates of bicycling] and control schools.**”*⁵

² Safe Routes Partnership, *Research: Academic Performance and Attendance* [online here](#).

³ “Making Strides 2020; State Report Cards on Support for Walking, Bicycling, and Active Kids and Communities”, p. 14, by the Safe Routes Partnership website [introduction here](#) and the [full report here](#).

⁴ “The Link Between Kids Who Walk or Bike to School and Concentration”, an article in City Lab [online here](#)

⁵ *What Makes a “Biking” School? How Some Schools Have Pulled Ahead in Cycling Rates*, an info brief by the Pedestrian and Bicycle Information Center, p. 7, [online here](#).

The University of Washington produces an annual Transportation Report surveying the campus about the use of all modes of transport. One of the questions lists 7 potential bicycle facility improvements and asked if they would encourage more bicycle commuting.

In 2014, 46% answered that more secure parking would provide more encouragement (ranked # 4 in the choices for improvements – more bike paths & lanes was # 1,), 44% answered that covered parking would be an encouragement, (ranked # 5 in the list), and 31% answered that more bike racks would be an encouragement (ranked # 7 in the list).⁶

After providing more parking, the 2019 survey results changed to 15% answered that more secure parking would provide more encouragement (ranked # 2 in the choices for improvements – more bike paths & lanes was # 1,), over 12% answered that covered parking would be an encouragement, (ranked # 5 in the list), and over 10% answered that more bike racks would be an encouragement (ranked # 7 in the list).⁷

It's not just kids' bikes

In increasing amounts many teachers, staff, and parents are commuting by bike, including using large cargo or family bikes, special bikes more easily damaged, and electric bikes. Some cost towards \$10,000. Because teachers and staff are often at school for longer hours than the students, including during periods of darkness, both inadvertent damage and security are of heightened concern. Provisions must be made for them.

Departures in General

See the Attachment A - "Bicycle Racks for Seattle Public Schools" – it underlies many of the following comments for Departures # 3, 4, & 5.

Prior to deciding whether to recommend any departure, the Departure Request Committee must determine if there's an "educational need" to students in SPS reducing the code. This is a key requirement in the committee's mandated review standards.

SMC 23.79.008.C.1.b:

"Need for Departure. The physical requirements of the specific proposal and the project's relationship to educational needs shall be balanced with the level of impacts on the surrounding area. Greater departure may be allowed for special facilities, such as a gymnasium, which are unique and/or an integral and necessary part of the educational process; whereas, a lesser or no departure may be granted for a facility which can be accommodated within the established development standards."

⁶ University of Washington 2014 Transportation Survey Final Report, March 2015, p. 42, [online here](#).

⁷ University of Washington 2019 Transportation Survey Final Report, March 2020, p. 40. [online here](#).

Departure #2 for Parking Quantity (Automobile)

The code requires 146 automobile parking spaces. SPS proposes 50 automobile parking spaces for a departure of 96 spaces. According to the Departure Presentation the school currently has 21 parking spaces.⁸

We would encourage the parking area to be reduced to nearer the existing number of 21. We would suggest omitting the 8 stalls at the north end of the parking lot and the 10 standard parking stalls at its west side (leaving the 3 accessible stalls). That would leave a total of 32 stalls, which would still be a 35% increase over the existing number.

We recommend and encourage this for several reasons:

1. It would respond to an educational need by allowing more space for play, more space for school programs such as recess and physical education, more green space which is psychologically beneficial to kids and educators, and more space for programs about the natural environment.
2. It would reduce the amount of required drainage and the amount of paving, thereby helping the city meet its environments goals while allowing Seattle Public Schools to concentrate its financial resources on benefiting its students.
3. It would help reduce the amount of auto trips impacting NW 107th Street, a neighborhood residential street.
4. It would align with city policies to encourage alternative forms of transportation and to reduce the amount of single-occupancy vehicle traffic.

Departure #3 for Bicycle Parking (Long Term) Quantity

The code requires 129 long term bicycle parking spaces. SPS proposes 80 long-term bicycle parking spaces for a departure of 49 spaces.⁹

The Seattle Municipal Code's recent revision requiring the amount of bike parking described above was carefully considered. It recognized that it requires more bike parking than is currently used. It recognized that the amount of bike commuting, by both students, teachers and staff, parents, and the public in general is quickly increasing. It recognized that the shift from older style bikes to electric bikes, family and cargo bikes, and many other styles is rapidly increasing the use of bikes and is changing the parking provisions needed for them. And it recognized that it is both city and state policy to encourage alternative means of transportation and discourage the use of private cars.

New schools have a lifespan of many decades. The amount of bike parking should be planned to meet future needs, not the past. If for some reason the amount of bike parking cannot meet

⁸ Op cit, Viewlands Elementary School Departures Presentation, p. 62

⁹ Ibid., pp. 74-77

code, then at the very least space should be planned, delineated, and reserved for its future expansion.

It is not clear what types of bike racks are being proposed. The types of racks should be spelled out. That makes a difference in the number of bikes they accommodate. A note in the Departures Presentation on p. 75 says “Bicycle racks shown are per the SDOT Bicycle Standards”¹⁰, but those standards are in flux, so it’s not clear which standards are represented. “Staple” or “inverted U” type racks should be required.

Depending on the types of racks, it is not clear that the space provided is adequate for the number of bikes proposed, nor is it clear how many non-standard bikes such as family, cargo, or recumbent bikes can be accommodated. Just like requirements for showing parking spaces, the adequacy of the area for the number of bikes and adequate provision for non-standard bikes should be shown.

Departure # 4 for Bicycle Parking (Short Term) Quantity

The code requires 43 short term bicycle parking spaces SPS proposes 20 short-term bicycle parking spaces for a departure of 23 spaces.¹¹

For the same reasons enunciated above in our comments for Departure # 3, we suggest (1) if for some reason the amount of bike parking cannot meet code, then at the very least space should be planned, delineated, and reserved for its future expansion, (2) the types of bike racks be spelled out and that they be “staple” or “inverted U” type racks, and (3) the provision of adequacy of the area for the number of bikes and provision for larger non-standard bikes should be shown.

Departure # 5 for Bicycle Parking Standards

The code requires security features such as locked rooms or cages or bicycle lockers. SPS proposes covered, open bike racks as a departure.¹²

Security of bikes is always a concern, especially for teacher’s and staff bikes which are likely there for longer periods, including during hours of darkness. The location of long term storage is shown exposed to the public, without security fencing, and against a blank wall with few or no windows positioned to provide “eyes on.” This is unacceptable. Either relocate the long term storage to a secured area, or relocate the bikes to in front of the adjacent windows by slightly revising the overhead canopy.

For security the types of bikes racks can also make a difference. The types of racks should be required to the “staple” or “inverted U” racks. See Attachment A - “Bicycle Racks for Seattle Public Schools”

¹⁰ Ibid. p. 75

¹¹ Ibid., pp.79-81

¹² Ibid, pp. 82-85

Sincerely,
On behalf of the School Traffic Safety Committee

A handwritten signature in black ink, appearing to read "Lee Bruch". The signature is fluid and cursive, with a large initial "L" and "B".

Lee Bruch
Member

Website: <https://www.seattle.gov/school-traffic-safety-committee>

Email: stsc@seattle.gov

Attachment A - Bicycle Racks for Seattle Public Schools

Seattle School Traffic Safety Committee - September 2, 2020

Summary

Seattle Public Schools has been using the “coat-hanger” types of bike racks. It appears to be continuing to do so. That style fails many of the needs for a good bicycle rack. It is no longer recommended nor accepted by the Seattle Department of Transportation (SDOT) nor many jurisdictions or users such as Sound Transit, Metro, Seattle Parks and Recreation, and others. Its use is discouraged by the Association of Pedestrian and Bicycle Professionals and others.

Bike racks at schools do not serve just kids. Increasingly many teachers, staff, and parents are commuting by bike, including large cargo or family bikes, special bikes more easily damaged, and electric bikes. Some cost towards \$10,000. Because teachers and staff are often at school for longer hours than the students, including during periods of darkness, both inadvertent damage and security are of heightened concern.

Bicycle use is expected to increase substantially, likely exponentially. It has been City of Seattle and State Policy to increasingly encourage forms of commuting alternative to single family cars, including bicycles. The requirements for trip reduction by large employers are growing. The necessity of spending constraints on both public and private budgets is resulting in rethinking expenditures for transportation, moving away from the costs that private cars (and school buses) impose, and moving towards active transportation, including bicycles. The evidence of the important role that active transportation plays in improving student performance and in forming life-long well-being is well-known and forward-looking districts are capitalizing on it.

New schools will be serving the community for decades. It is important the schools be built to serve the future, not the past.

Seattle Public Schools should begin to use the “staple” or “inverted U form of rack as quickly as possible, and those should be the only style of racks used in new installations for many reasons enunciated below.



Hanger racks can be difficult to use when crowded; bikes tangle with each other



Problems are created when adequate storage for a variety of bikes is not available



New “staple” racks at UW Sound Transit station accommodate many styles of bikes, from small to large

The preferred solution

The best and preferred solution for long-term bike parking is in a fully enclosed space. The next-best solution is in a secured fenced area. Wherever possible one of those solutions should be used.

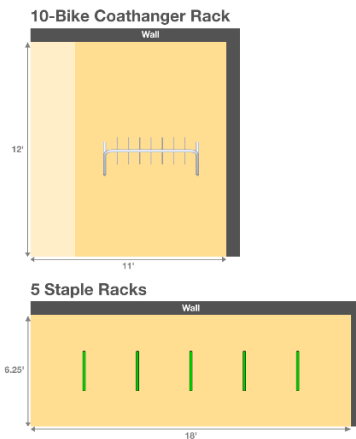
Only where the above is not possible should exposed bike racks be used for long-term storage (defined by the Seattle Municipal Code 23.54.015K as more than 4 hours). In such situation it is important to provide additional security and use the most appropriate and secure type of racks.

Summary of the failures of hanger-style racks

One of the best detailed summaries of the failures of hanger-type racks can be found the online article “Bad Bike Racks: Coathangers” at <https://bicyclesecurityadvisors.com/2017/06/06/bad-bike-racks-coathangers/>.¹

The failures include:

- They do not accommodate many styles of bikes, including electric, family, and cargo bikes
- Poor lockability for many bike configurations
- Poor security in unsupervised locations
- They provide bad stability for the bikes; often the bikes entangle with and lean on others
- It is often difficult to put a bike in, or take it out, of a crowded hanger-style rack.
- The user experience of hanger-style racks is poor and uncondusive to the use of them and of bikes
- Space efficiency: counterintuitively, when including access space and depending on the configuration, hanger-style racks can often use as much space or more than staple racks



The design details of much better alternative (staple or inverted “U” style) racks is summarized in an online article “Optimal Rack” at <https://bicyclesecurityadvisors.com/best-practice-guides/parking/optimal-rack/>.²

City of Seattle Requirements

The Seattle Municipal Code (SMC), in a recent revision, outlines bike parking requirements, including:

¹ Bicycle Security Advisors article “Bad Bike Racks: Coathangers” at <https://bicyclesecurityadvisors.com/2017/06/06/bad-bike-racks-coathangers/>

² Bicycle Security Advisors article “Optimal Rack” at <https://bicyclesecurityadvisors.com/best-practice-guides/parking/optimal-rack/>

*“23.54.015K.2 Performance Standards. Provide bicycle parking in a highly visible, safe, and convenient location, emphasizing **user convenience and theft deterrence**, based on **rules promulgated by the Director of the Seattle Department of Transportation** that address the considerations in this subsection 23.54.015.K. [emphasis added]”*³

In response to that requirement, the Directors of the Seattle Department of Construction and Inspections (SDCI) and the Seattle Department of Transportation (SDOT) have proposed⁴ a joint directors rule, “SDCI Director’s Rule ___-2020 & SDOT Director’s Rule 1-2020”⁵ which should be enacted in the near future.

The Director’s Rule, on its pp. 3-7 specify and diagram required bicycle parking dimensions and clearances from obstructions and on its p. 7 it addresses security:

“4. Security

*Each required bicycle parking space must provide an associated rack or bicycle-parking fixture to which the bicycle can be locked. **Each rack or fixture must allow locking of bicycle frames and one wheel with a U-lock....** [emphasis added]”*⁶

A hanger-style rack violates this; it does not allow for use or locking by U-Lock for many styles of bike.

The Directors Rule refers to Seattle Bicycle Parking Guidelines for many of the details for proper bicycle parking and racks design:

*“SDOT’s Seattle Bicycle Parking Guidelines are used to locate and design short-term bicycle parking in the right-of-way and provide additional guidance on bike parking design and installation.”*⁷

The Seattle Bicycle Parking Guidelines March 2018 Draft⁸ describes many details of bicycle parking facilities, including:

Bicycle Parking Classification Chart, p. 3

Good and Bad Examples of Short Term Bicycle Parking Installations, p. 11

Chapter 4 – Bicycle Rack Examples and Specifications pp. 17-19

Appendix D – Short-Term Parking Layout, p. 30

Appendix E – Long-Term Parking Layout Examples, pp. 31-33

Among its guidelines there are specific guidelines for bike racks for long-term parking.

“Racks

- *Racks should be mounted with secure theft resistant anchoring*
- *All racks must **support a bicycle in two places and a bicycle should be able to lock a front wheel with a U style lock** without having to remove the wheel of the bicycle*
- *Provide a minimum 50% of racks which do not require lifting and allow bicycles to sit horizontally on ground”*⁹ [Emphasis added]

³ Seattle Municipal Code, 23.54.015K, found at https://library.municode.com/wa/seattle/codes/municipal_code/281112

⁴ Announcement of proposed directors rule at <http://www.seattle.gov/transportation/document-library/directors-rules-and-ordinances>

⁵ Draft Directors rule at <http://web6.seattle.gov/dpd/edms/GetDocument.aspx?id=5322845>

⁶ Ibid, p. 7

⁷ Ibid, p. 2

⁸ The Seattle Bicycle Parking Guidelines May 2018 Draft, at

https://www.seattle.gov/Documents/Departments/SDOT/BikeProgram/SDOT%20Bicycle%20Parking%20Guidelines_6.11_WORKING_DRAFT.pdf

⁹ Ibi , p. 15

Coat-hanger racks do not meet the above guideline; they do not provide two points of support for a bike, and do not provide for the ability to lock many frames plus wheel to the rack using many U-style locks.

Other jurisdictions and references:

SDOT, Seattle Parks, Metro, and Sound Transit have ended (or are in the process of ending) procurement of coat-hanger style racks. Both SDOT and Seattle Parks removed coat-hanger racks on their list of pre-approved racks. SDOT's street use permit team no longer approve of coat-hangers racks installed on public sidewalks as part of review of new buildings. Sound Transit was formerly installing coat-hanger racks at all its light rail stations, but and now uses Sportworks Tofino racks exclusively (a staple style rack).

The Association of Pedestrian and Bicycle Professionals has produced a guide “Essentials of Bike Parking” at https://www.apbp.org/assets/docs/EssentialsofBikeParking_FINAL.pdf.

Its page 6 diagrams recommended racks, and its page 7 diagrams racks to avoid (which includes hanger-style racks.) – both copied below ¹⁰

RACK STYLES

The majority of manufactured bike racks fall into one of the categories on pages 6-8. Within a given style, there is wide variation among specific racks, resulting in inconsistent usability and durability. APBP recommends testing a rack before committing broadly to it.

RACKS FOR ALL APPLICATIONS

When properly designed and installed, these rack styles typically meet all performance criteria and are appropriate for use in nearly any application.

INVERTED U
also called sub U, loop



Common style appropriate for many uses: two points of ground contact. Can be installed in series on rails to create a free-standing parking area in variable quantities. Available in many variations.

POST & RING



Common style appropriate for many uses: one point of ground contact. Compared to inverted-U racks, these are less prone to unintended perpendicular parking. Products exist for converting unused parking meter posts.

WHEELWELL-SECURE



Includes an element that cradles one wheel. Design and performance vary by manufacturer; typically contains bikes well, which is desirable for long-term parking and in large-scale installations (e.g. campus); accommodates fewer bicycle types and attachments than the two styles above.

RACKS TO AVOID

Because of performance concerns, APBP recommends selecting other racks instead of these.

WAVE
also called undulating or serpentine



Not intuitive or user-friendly; real-world use of this style often falls short of expectations; supports bike frame at only one location when used as intended.

SCHOOLYARD
also called comb, grid



Does not allow locking of frame and can lead to wheel damage. Inappropriate for most public uses, but useful for temporary attended bike storage at events and in locations with no theft concerns. Sometimes preferred by recreational riders, who may travel without locks and tend to monitor their bikes while parked.

COATHANGER



This style has a top bar that limits the types of bikes it can accommodate.

WHEELWELL



Racks that cradle bicycles with only a wheelwell do not provide suitable security, pose a tripping hazard, and can lead to wheel damage.

BOLLARD



This style typically does not appropriately support a bike's frame at two separate locations.

SPIRAL



Despite possible aesthetic appeal, spiral racks have functional downsides related to access, real-world use, and the need to lift a wheel to park.

SWING ARM SECURED



These racks are intended to capture a bike's frame and both wheels with a pivoting arm. In practice, they accommodate only limited bike types and have moving parts that create unneeded complications.

¹⁰ The Association of Pedestrian and Bicycle Professionals, “Essentials of Bike Parking” at https://www.apbp.org/assets/docs/EssentialsofBikeParking_FINAL.pdf.

Sheehan, Maureen

From: Sebastian 360 <sebastianwilson360@gmail.com>
Sent: Friday, August 14, 2020 5:50 PM
To: Sheehan, Maureen
Subject: Viewlands Departures

Categories: Viewlands Elementary

CAUTION: External Email

Hi Maureen,

I am a parent of a Viewlands student and long term resident of the neighborhood. I am writing in support of each of the departures listed.

Thank you for your work on this project!
Sebastian



Virus-free. www.avast.com

Sheehan, Maureen

From: Steve Durrant <stevedurrant@altaplanning.com>
Sent: Thursday, August 20, 2020 10:53 AM
To: Sheehan, Maureen
Cc: brfabella@seattleschools.org
Subject: Requested departures for Viewlands Elementary School

Categories: Viewlands Elementary

CAUTION: External Email

Regarding the requested departures for bicycle parking delivered in the architect's presentation found here http://www.seattle.gov/Documents/Departments/Neighborhoods/MajorInstitutions/Viewlands%20Elementary/20200729_Viewlands_Departures.pdf

The proposed reduction is an unmitigated dismissal of the community's need and desire for safe and secure human powered access to public facilities, and more importantly, a denial of the benefits that can accrue to children, families, staff, and the community as a whole by improving access to and participation in active transportation.

For an elementary school in particular, the design should strive to exceed the already conservative minimum standards, not reduce them by half for daily users and more than a third for long term users. The proposal completely dismisses the need for secure bicycle parking, a feature known to encourage faculty, staff and volunteers to ride more often.

This constrained site also proposes a 2/3 reduction in auto parking. Each person choosing to ride a bicycle is a person not needing parking. Up to 10 bicycles can be parked in one auto parking space. 20 bicycles if you include parking lot circulation.

In addition to the well documented and well known health benefits for children and adults, research shows a dramatic improvement in academic achievement for children that ride bicycles.

The Department of Neighborhoods should deny these departures from these reasonable development expectations. The proponent should withdraw these proposed departures and in fact reverse course, for the benefit of the District, the school and the surrounding community.

Background: Steve Durrant, FASLA, is a principal at Alta Planning + Design, the leading international consulting firm specializing in bicycle and pedestrian infrastructure design. He has more than 40 years of experience in transportation planning, landscape architecture and bicycle and pedestrian infrastructure planning and design. Steve leads Alta's practice in Seattle.

Steve Durrant, FASLA
Principal
stevedurrant@altaplanning.com
503.984.1995
Seattle