



City of Seattle

---

Gregory J. Nickels, Mayor  
**Department of Planning and Development**  
Diane M. Sugimura, Director

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

**Application Number:** 2401480  
**Applicant Name:** Seattle School District Number One  
**Address of Proposal:** 400 23<sup>rd</sup> Ave.; Garfield High School

**SUMMARY OF PROPOSED ACTION**

Master Use Permit for future renovation of and addition to Garfield High School. The project includes selective internal demolition of the historic school and salvage of landmark exterior elements. The scope of the future construction includes rebuilding interior areas of the saved building, outdoor athletic buildings, technology upgrades, a new gymnasium, performing arts center and teen life enter building and a new plaza area, on-site bus loop and parking lots. The proposal would include 29,700 cu. yards of grading.

**NOTE:** This decision has been modified to correct the total number of parking stalls on site and adjust the language regarding the new student enrollment.

The following approvals are required:

**SEPA - To approve, condition or deny pursuant to Seattle’s SEPA policies.** Chapter 25.05, Seattle Municipal Code. (EIS prepared by Seattle School District)

**Development Standard Departures - to approve or condition the following departures:**

- To continue to allow on-street bus loading - SMC 23.44.017G
- To allow less than required on-site parking spaces - SMC 23.44.017E
- To allow new addition within required side yard and setback on north side of site - SMC 23.44.008, SMC 23.45.014
- To allow an additional 25 feet of height for a new addition – SMC 23.44.014, 23.45.112

**SEPA DETERMINATION:**     Exempt     DNS     MDNS     EIS\*  
   DNS with conditions  
   DNS involving non-exempt grading, or demolition, or another agency with jurisdiction.

\*Draft and Final Supplemental EISs completed by Seattle School District Number One.

## **BACKGROUND DATA**

### Site and Vicinity Description

The Garfield High School campus is approximately 8.9 acres in size. It is bounded on the north by the Garfield Park, on the east by 25<sup>th</sup> Avenue, on the west by 23<sup>rd</sup> Avenue and on the south by East Alder Street. Located in the Central Area of Seattle, the school is adjacent to the Garfield Community Center, Medgar Evers Pool and the Garfield Park Playfields to the north and single family residential houses on the east and south. 23<sup>rd</sup> Avenue is a main arterial street located to the west. To the north, across E. Cherry St. from the park area is the Horace Mann School, a public elementary school with approximately 20 spaces of on-site parking capacity.

The school site is terraced and slopes down toward the north and west. The 1923 building and 1929 addition are situated on an upper terrace in the southwest portion of the site. The gym is detached and located on a lower terrace in the northwest portion of the site, and the parking lot, playfield, and track occupy the eastern half of the site on an intermediate terrace. Both of the double portable units and one single unit are located between the track and field and the 1923 building, the other four single units are located on the northwest side of the 1923 structure.

The streets surrounding Garfield are developed with sidewalks and curbs. The main arterial through the neighborhood is 23<sup>rd</sup> Avenue. Parking is allowed on all streets surrounding the school with the exception of 23<sup>rd</sup> Avenue. A school bus loading zone on E. Alder extends from 23<sup>rd</sup> Avenue to 25<sup>th</sup> Avenue and limits parking between the hours of 7am – 9am and 1pm – 3pm. School related and resident parking occurs in these areas when they are not restricted to bus loading.

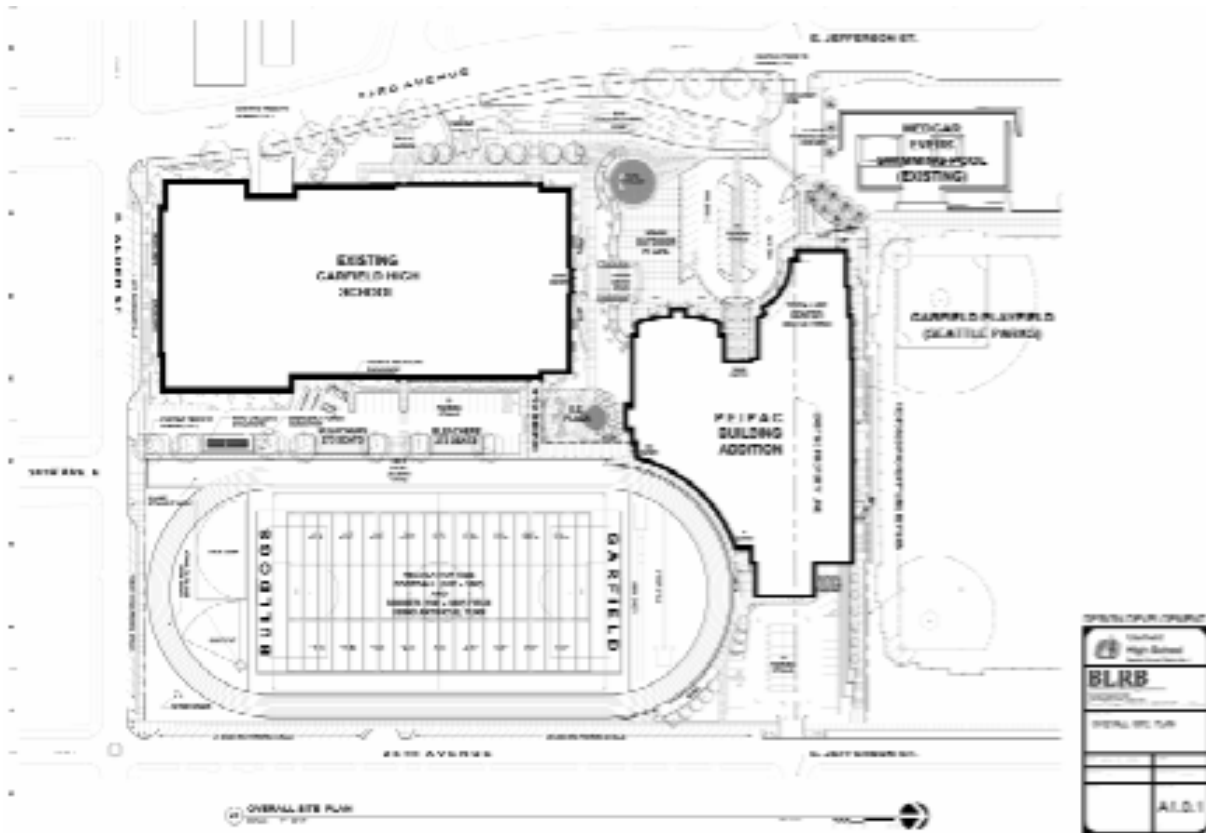
### Proposal Description

The proposed project will include the following:

- Demolition of the 1962 gymnasium and teen life center
- Historic renovation of the 1923 and 1929 buildings
- A new 74,000 sf addition located in the northeast corner of the site in approximately the same location as the existing 1962 gymnasium.
- An outdoor plaza will be located north of the main entrance to the 1923 school building between the main entrance and the parking area.
- All onsite modular buildings will be removed.

The new 74,000 sf addition will house a new state of the art performing arts center, a three court gymnasium, a new Seattle Parks Department Teen Life Center and accessory spaces. The seating capacity of the performing arts center is approximately 600 and the gym will seat approximately 1800.

In the historic 1923 and 1929 buildings, the landmarked exterior and areas of the interior will be salvaged and restored. The remaining areas will be demolished and reconfigured to house educational program space. The planned enrollment for the new facility is 1600 students.



Improvements to the site include the following:

- Regulation size track and field will be constructed on the southeastern portion of the site.
- The three onsite parking lots will be reconfigured and expanded to accommodate a total of 109 on-site parking stalls (99 on site, 10 on Parks site).
- A new on-site bus lane will be located parallel to 23<sup>rd</sup> avenue and will accommodate 18 buses.
- Some sidewalks and street trees on the east side will be retained.
- The WWII memorial rhododendron garden will be culled and relocated.
- The “Peace Garden” located on the south and west sides of the 1929 addition will be relocated.
- Most of the mature trees on the west side of the track and field are expected to be retained.
- Four to five mature trees in the parking strip along 23<sup>rd</sup> Avenue are to be retained.

The new addition will be located slightly to the north of the existing property line to accommodate the full size track and field. The District has received approval from the Parks Department to swap the 0.82 acre property at Garfield for another parcel in the City. The District and the Parks Department are currently working to complete the property swap proposal.

Public Comments

The SEPA comment period ran from March 4, 2004 to March 17, 2004. No written SEPA comments were received.

Two public meetings of the Development Standard Departure Advisory Committee (“Departure Committee”) were held on May 27, 2004 and June 8, 2004. Public comments at the meetings focused on whether the surrounding neighborhood could absorb school event parking and security in the parking lot and along walkways during evening events.

### **ANALYSIS - DEVELOPMENT STANDARD DEPARTURE**

This Development Standard Departure process is being conducted pursuant to the provisions of the Seattle Municipal Code (SMC) sections 23.79.002.012. An Advisory Committee was convened, public comments were received, and a written recommendation to the Director of the Department of Planning and Development (DPD, formerly DCLU) was prepared. This analysis and decision is made pursuant to the requirements of SMC Section 23.79.010 (i.e., that the Director determine the amount of departure to be allowed as well as mitigation measures to be imposed). Criteria set forth in the applicable code sections are to be used for both the Departure Committee’s recommendation and the Director’s decision.

#### **Specific Departure Requests**

The Seattle School District (the District) on behalf of the Garfield High School Historic Renovation, Demolition and New Construction project requests the following departures:

**Bus Loading:** The School District requests a departure to continue on-street bus loading on the east side of the school on 25th Avenue for overflow and athletic busses.

**Increased Height:** The School District requested a departure of 25 feet above the height limit of 35 feet in a single family zone for the new addition.

**Setbacks:** The School District requested a departure to setback 12 and a half feet instead of the required 15 to 25 feet from the northern property line. (Emergency exit stairs will protrude an additional 6 feet 8 inches further into these setback areas.)

**Parking:** The School District requested a departure to waive up to 340 on-site parking spaces as required to serve the new gymnasium, performing arts auditorium, the cafeteria/commons, and the Teen Life Center.

#### **Criteria for Reviewing Departure Requests**

According to Section SMC 23.79.008, 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 SMC, 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:

**Relationship to Surrounding Areas:** The Advisory Committee shall evaluate the acceptable or necessary level of departure according to:

- Appropriateness in relation to the character and scale of the surrounding area;

- Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale;
- Location and design of structures to reduce appearance of bulk;
- Impacts on traffic, noise, circulation and parking in the area, and
- 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.

**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 departures 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 that can be accommodated within the established development standards.

### ***Departure #1: Setback***

#### **A. Relationship to Surrounding Areas**

##### ***1) Appropriateness in relationship to the character and scale of the surrounding area.***

The proposed building would be part of the high school campus with another, larger building. The setting is institutional. The block is shared by the school with the Seattle Parks Department where the improvements include an indoor pool, a community center and athletic fields. The area of setback reduction along the north property line contains proposed improvements designed to join the park areas and the school areas in an integrated way. A plaza would cross the property line. A teen center, incorporated into the proposed new building, will function as part of the Parks site as much as it would part of the high school. Similarly, the new gymnasium and locker room facilities will function to a large extent in conjunction with the athletic fields to the north. Given the interconnectedness of the proposed new improvements with the existing park amenities and the existing large building character of the block, the proposed setback from the north property line is thought to be appropriate.

##### ***2) Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale.***

The north property line along which this reduced setback is proposed is the south property line of the Garfield Park play fields. Along the north side of the proposed new school building would be a paved walkway. Beyond the new walkway would be the open fields of the public park. This relationship to the park means that the park itself provides a buffer and area for a transition in scale to take place; lessening the need to do so on the proposal site with a setback from the north property line. It would be appropriate to allow the requested setback reduction.

##### ***3) Location and design of structures to reduce appearance of bulk.***

Along the north façade the proposed structure will be a wall without windows. This configuration is necessitated by the gym and theatre uses within the building. Little can be done to ameliorate this given

the site constraints of this proposal. The fact that this portion of the structure faces the park athletic fields mitigates the appearance of bulk.

***4) Impacts on traffic, noise, circulation and parking in the area.***

No such impacts are expected from this setback reduction.

***5) Impacts on housing and open space.***

No such impacts are expected from this setback reduction.

***B. Need for Departure***

The constraints of the very small Garfield High School site with the need to put a full size track around the football/soccer field, to put as much parking and bus loading on the site as possible and to fully preserve the historic building combine to require this modest amount of relief.

***Departure #2: Allow continued on-street bus loading***

***Relationship to Surrounding Areas***

***1) Appropriateness in relationship to the character and scale of the surrounding area.*** On-street bus loading and unloading occurs on 25<sup>th</sup> Avenue and would represent no real change from the current situation. Total enrollment at Garfield High School is not anticipated to increase significantly in the near future. The current enrollment at Garfield School (2004) is 1630 students and the existing capacity of the school is 1,600 students. Upon completion of the proposed project the planned enrollment of the school will be 1,600 students. The departure to allow continued on-street bus loading on 25<sup>th</sup> Avenue would only be used for overflow busses that are above and beyond the 18 bus limit in the on-site bus lane and for after school activity busses.

***2) Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale.*** Since this request is for bus loading and unloading only and does not involve the development of any structures for this use, this criterion does not directly apply.

***3) Location and design of structures to reduce appearance of bulk.*** Since this request is for bus loading and unloading only and does not involve the development of any structures for this use, this criterion does not directly apply.

***4) Impacts on traffic, noise, circulation and parking in the area.*** The overall number of drop-off/pick-up trips is not expected to increase noticeably. Street bus loading and unloading would represent a decrease from the current situation due to the new on-site bus lane which will accommodate 18 out of the current 21 busses.

***5) Impacts on housing and open space.*** There would be no impact of granting this departure request on open space. The departure would allow existing impacts from bus loading on 25<sup>th</sup> Avenue to continue.

***A. Need for Departure***

Currently buses are staged on 25th Avenue. There will be a continued need for transportation to the school and for bus loading and unloading. In light of the small size of the project site for its long-standing use as an urban public high school, accommodating all 21 busses on-site is not feasible without severe compromises to other program needs.

***Departure #3: Increase the permitted heights for the new addition***

***A. Relationship to Surrounding Areas***

***1) Appropriateness in relationship to the character and scale of the surrounding area.*** The existing 1923 landmark building is approximately 64 feet high at the stage loft and 52' high for the remainder of the facility. The zoning boundary splits the building 15 feet west of the building centerline; an L-1 zone abuts Single Family which extends about 25 feet east of the building centerline. The new adjacent building will also exceed the zoning height limit, but will remain below the height of the existing stage loft. The new building heights will not exceed 60 feet. The School District requests a departure of 25 feet above the single family and L-1 zoning height limits of 35 feet. The height extension would be needed to meet the programmatic needs of the school.

Currently, the existing gymnasium building obstructs the views of neighbors. The landmark study revealed that the new building would not add to the view obstruction already posed by the existing tress and building. Demolition of the flanking building would create more open space on the project site, thereby reducing the mass and scale of the school's campus and improving views from the neighborhood to the north and east.

***2) Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale.*** No significant adverse impacts would result from the requested height departures for the new building. The proposed project site is bounded on the east by 25th Avenue and the north by Garfield Park owned by the City of Seattle Parks Department. The current school design does not allow many views of the school from vehicles or pedestrians along 23<sup>rd</sup> Avenue. or E. Cherry Street, and therefore decreases the sense of cohesion between the neighborhood and the school. The proposed project would include removal of the existing gymnasium building and all onsite portables. The areas where the existing gymnasium is located will be the approximate location of the new gymnasium building. Stairways would provide pedestrian access to elevated courtyards that would be built adjacent to the renovated landmark building on the north side. These features would open up and join the campus to the community.

***3) Location and design of structures to reduce appearance of bulk.*** The request for an increase in permitted height limits for the new gymnasium building will not result in increased height and bulk for the campus beyond current conditions. The proposed new building would not stand higher than the existing 1923 landmark building. The area currently occupied by the portable buildings on the north side of the 1923 building will be replaced by open gathering spaces connected to 23<sup>rd</sup> Avenue via terraced gardens. The area currently occupied by the portable buildings on the east side of the 1923 building will be replaced with open gathering spaces, a covered connection between the historic building

and the new addition, and additional parking spaces in the center lot. This feature will open the campus up for community gathering areas and provide better visibility of the historic landmark from 23<sup>rd</sup> Avenue.

**4) Impacts on traffic, noise, circulation and parking in the area.** This request does not generate impacts related to traffic, noise, circulation or parking; this criterion does not directly apply to this request.

**5) Impacts on housing and open space.** This request for an increase in permitted height limits for the new gymnasium and classroom building does not generate impacts related to housing and open space; therefore, this criterion does not directly apply to this request.

### **B. Need for Departure**

At 8.9 acres, the school site is substantially undersized for a modern high school. Modern high school sites are typically in the range of 40 acres. Given the constraints of the existing 8.9 acre site, the height departure for the new gymnasium/performing arts building is needed to maintain sufficient space for classrooms, school events and, community events while increasing the open space and interface with the neighborhood. The need for this structure is essential to the design and operation of the facility.

***Departure #4: To allow less than required on-site parking (382 required by the Land Use Code; 82 proposed)***

#### **A. Relationship to Surrounding Areas**

##### ***1) Appropriateness in relationship to the character and scale of the surrounding area.***

Parking on the Garfield High School site and in the vicinity of the site has been thoroughly studied. In total, the current site has 88 striped parking spaces. Parking on the existing site reaches 110 vehicles by “jamming” vehicles into parking locations which are not conforming to Seattle Land Use Code requirements. The new design would provide a total of 109 parking stalls. Of these spaces, 99 are proposed to be entirely on the District’s site. The remainder are located, in whole or in part, across the property line between the subject site and the park to the north. Those spaces on park property function as a part of the parking lots on the District’s site. Negotiations are under way between the District and the Parks Department to either adjust the boundary between the two sites or to otherwise work out an arrangement to allow mutual use of this parking. Information contained in the Garfield High School Supplemental EIS indicates that all remaining parking demand generated by the school is currently served by on-street parking on surrounding roadways.

The scale of the area surrounding Garfield High School is primarily single-family residential with some retail, mixed use and multi-family development interspersed. The high school has contributed to the scale and character of the surrounding community since its construction in 1923. The parking departure request does not affect the scale of the surrounding area.

Granting the requested departure would not result in a change in character for the surrounding area. The proposal would improve parking conditions compared to existing conditions, by providing an additional 21 code-conforming spaces (24 percent more parking) on the school site. Concerns about



parking lot safety during evening events would be mitigated through the installation of appropriate lighting in the parking lot and along pathways.

**2) Presence of edges (significant setbacks, major arterials, topographic breaks, and similar features) which provide a transition in scale.** This request for a reduction in the number of on-site parking spaces does not involve the development of any structures for this use; therefore, this criterion does not directly apply to this request.

**3) Location and design of structures to reduce appearance of bulk.** This request for a parking departure does not include a proposal to develop any structures; this criterion does not directly apply to the request.

**4) Impacts on traffic, noise, circulation and parking in the area.** Traffic analysis completed for the project indicates that there are currently 88 parking spaces provided on the school property. The District's proposal would increase the number of on-site (District and Parks property) parking spaces from the current 88 spaces to 109 spaces.

Moving bus loading to the west side of the school, with access from 23<sup>rd</sup> Ave., will result in a major lessening of traffic impacts on the residential streets to the east and north of the campus. There would continue to be automobile traffic on these residential streets, E. Alder St. and 25<sup>th</sup> Ave. This traffic is expected to be similar in amount and impact to the current condition.

Currently, students and some faculty and staff park in adjacent neighborhoods while they are at Garfield High School. This condition would be lessened slightly under the proposed plan as off-street parking would be increased. Where the Seattle Land Use Code required amount of parking to be provided parking impacts in the surrounding neighborhood would be greatly reduced. Unfortunately, the Garfield site is very small for a public high school. In the current proposed plan parking, buildings, bus loading, and an athletic field are squeezed onto the site without wasted space. It is in many ways an optimal compromise between providing needed services, architectural attractiveness and parking.

The minimum number of spaces required by the Seattle Land Use Code for the projects as designed is 382 spaces, based on the number of assembly seats if the Performing Arts Center, Gymnasium, Student Commons and Teen Life Center are used simultaneously. The code-required parking for the gym is 227 stalls; the theater would require about 77 stalls, the cafeteria would require another 74 stalls and the Teen Life Center would require another 6 stalls.

It is estimated that the 109 on-site spaces that are proposed would be adequate to meet the parking demand for employees and day use of the school. On street parking in the surrounding neighborhood is expected to remain at existing utilization levels. (Adolfson 2004)

Redevelopment of Garfield High School and changes related to parking are not expected to result in an increase in traffic along roadways adjacent to the site. Current enrollment at the school is 1630 students. The renovated school would have similar capacity for students and staff. Based on the facility

capacity, the level of service (LOS) is anticipated to remain at LOS B during the a.m. peak period (7:00 a.m. to 9:00 a.m.) and LOS C during the p.m. peak period (2:00 p.m. to 3:00 p.m.), which is within the acceptable range for the City of Seattle (LOS D).

Noise generated by continued parking in surrounding neighborhoods is expected to remain similar in amount and time to the current condition. Noise associated with pedestrians talking as they travel to and from parked cars and the sounds generated by the cars themselves would continue to be experiences in nearby residential areas in similar amounts and at similar times to the current conditions.

**5) Impacts on housing and open space.** There would be no impact of granting this departure request on open space. Because the school site abuts single-family homes, there are existing impacts on those homes adjacent to the site related to off-site parking. These impacts would continue.

### **B. Need for Departure**

A departure from the code requirement of 382 spaces is needed for several reasons. The topography and size (8.9-acre site) of the site make it too small to accommodate 382 spaces on-site in surface lots without compromising other necessary facilities at the school.

The Hearing Examiner's ruling on the Appeal of the Garfield High School Supplemental EIS (November 24, 2004) resulted in a condition requiring an increase in the number of on-site parking stalls being provided (from 82 to 99 stalls).

As discussed below, the Departure Committee recommended approval of the departures to parking provided that:

1. The School District will improve the pathway (from the main building) to the north of the site to connect to the crosswalk (across Cherry Street) to the Horace Mann site and that the Horace Mann site will be striped for the maximum amount of parking; and that
2. The School District, the City, and the district community councils will work in concert to develop a master plan for the Garfield campus (bounded on the north by Cherry Street, the south by Alder Street, the east by 25<sup>th</sup> Avenue, and the west by 23<sup>rd</sup> Avenue) to include but not be limited to improving the streetscaping, lighting, and landscaping; and that,
3. In mitigating the construction impacts, the School District will undertake a survey of the nearby neighbors on the perimeter of the Garfield campus to determine the conditions that need to be addressed; and that
4. The School District will work with the district community councils to bring about parking on both sides of 25<sup>th</sup> Avenue between Jefferson and Cherry Streets.

The conditions listed have been met and have been accepted in the School Development Standards Departure Advisory Committee's Final Report and Recommendations issued by the Department of Neighborhoods (August, 2004).

### **Departure Committee Recommendation**

The Garfield High School Development Standards Departure Advisory Committee recommends approval of the following departures with conditions:

**Setback.** It was moved and seconded that the committee recommends approval of the setback for the new addition of 12 feet along the north property line, which is less than the 15 to 25 feet required by the Seattle Municipal Code. The motion passed 8 to 0.

**Bus Loading.** It was moved and seconded that the committee recommends approval of the departure for bus loading on 25<sup>th</sup> Street as currently signed. The vote was 6 to 2.

**Building Height.** It was moved and seconded that the committee recommends the approval of the building height departure up to 60 feet for the new addition. The motion passed 8 to 0.

**Parking.** The Garfield citizens advisory committee on departures recommends approval of the parking departure of 340 on-site spaces in that 82 on-site parking spaces will be provided along with the following conditions:

1. The School District will improve the pathway (from the main building) to the north of the site to connect to the crosswalk (across Cherry Street) to the Horace Mann site and that the Horace Mann site will be stripped for the maximum amount of parking; And that
2. The School District, the City, and the district community councils will work in concert to develop a master plan for the Garfield campus (bounded on the north by Cherry Street, the south by Alder Street, the east by 25<sup>th</sup> Avenue, and the west by 23<sup>rd</sup> Avenue) to include by not be limited to improving the streetscaping, lighting, and landscaping; And that,
3. In mitigating the construction impacts, the School District will undertake a survey of the nearby neighbors on the perimeter of the Garfield campus to determine the conditions that need to be addressed; And that
4. The School District will work with the district community councils to bring about parking on both sides of 25<sup>th</sup> Avenue between Jefferson and Cherry Streets.

The motion passed 4 to 1.

In response to the conditions indicated above, a consultant was hired to develop a master plan for the Garfield campus. The first public meeting was held on October 16, 2004 to, to discuss issues input and suggestions for the master plan. The report was then drafted and was re-reviewed with the community during a meeting on March 10, 2005. The report includes improvements to be made to the pathway connecting the school site to Horace Mann. In addition, the design team has met with the Seattle Department of Transportation to sign 25<sup>th</sup> Avenue to allow parking on both sides of the street. As construction of the project gets underway, community meetings will be held and a survey will be issued to nearby residents to address construction concerns.

#### **Decision - Development Standard Departure**

1. **To allow a setback of 12 and a half feet at the north side of the building. (Emergency exit stairs will protrude an additional 6 feet 8 inches further into these setback areas.): GRANTED.**
2. **To allow continued on-street bus loading: GRANTED.**
3. **To increase the permitted heights for the new building: GRANTED.**

4. **To allow less than required on-site parking (from approximately 382 to 82):**  
**GRANTED.**

**Analysis – SEPA**

Environmental impacts of the proposal have been analyzed in environmental documents prepared by the Seattle School District. These include a Draft and Final Supplemental Environmental Impact Statement with project level information on the Garfield High School Historic Renovation, Demolition and New Construction project (May 24, 2004 and September 10, 2004 respectively); the 1992 EIS on the District's Facilities Master Plan, and the 2000 Supplemental EIS on Phase II of the Building Excellence program.

On September 26 and 27, 2004, appeals were filed on the adequacy of the Final Supplemental EIS for historic renovation, demolition and new construction at Garfield High School. The hearing on the appeals was held on November 4, 2004, and the Hearing Examiner issued a recommendation on November 24, 2004. The Hearing Examiner recommended that the Superintendent and School Board adopt the Examiner's findings of fact and conclude:

- That the FEIS contains a reasonably thorough discussion of the significant aspects of the environmental consequences of redeveloping Garfield High School, using the preferred alternative;
- That the "no action" alternative, considered in the previous programmatic EIS, need not be repeated in the FEIS and
- That the level of detail in the FSEIS was commensurate with the importance of the impacts and the plausibility of the alternative.
- That the changes in the proposal with occurred after the FSEIS was issued do not justify issuance of a supplemental EIS.
- That the FSEIS issued on September 10, 2004 is adequate for the purposes intended.

In December of 2004 District Superintendent Raj Manhas adopted the recommendations of the Hearing Examiner, and denied the appeals, pursuant to Seattle School Board Resolution No. 87-17, which establishes the District's policies and procedures for compliance with the State Environmental Policy Act.

Seattle Municipal Code (SMC) Section 25.05.660 provides that proposals can be conditioned or denied in order to mitigate environmental impacts. All conditions must be related to impacts identified in the environmental documents, must be based on adopted policies, and must be reasonable and capable of being accomplished. This proposal is reviewed under that substantive SEPA authority.

Disclosure of the potential environmental impacts from this project was made in the environmental documents listed above. This information, supplemental information provided by the applicant (plans, written descriptions of the project, traffic report), and the experience of this agency with review of similar projects form the basis for this analysis and conditioning.

The SEPA Overview Policy (SMC 25.05.665) establishes the relationship between codes, policies, and environmental review. Specific policies for specific elements of the environment, certain neighborhood plans, and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority.

The overview policy states in part:

“where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation (subject to some limitations).”

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

### Short-Term Impacts

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

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

### Construction Noise

There will be site grading to prepare the building site, as well as other noise generating construction activities. Noise associated with the construction of the building could adversely affect the residential areas in the vicinity of the proposal site, particularly those directly across from the construction area on E. Alder St. and 25<sup>th</sup> Avenue. Due to the proximity of residentially zoned areas in relation to the proposal site, the limitations of the Noise Ordinance appear to be inadequate to protect the residential neighborhood. To minimize construction noise impacts to residential neighborhoods, DPD has conditioned projects of a similar scale to limit hours of construction to 7:00 A.M. to 6:00 P.M. on weekdays and to 8:00 AM to 5:00 P.M. on Saturdays. This condition has been successfully applied in the past and will be imposed here.

The Department recognizes there may be occasions when critical construction activities of an emergency nature, related to safety or traffic issues, or that could substantially shorten the total construction time frame, may need to be completed after regular construction hours as conditioned herein. Therefore, the Department reserves the right to approve waivers of this restriction on construction hours. Such waivers must be approved by the Department on a case-by-case basis prior to such work.

It is also recognized that there are quiet non-construction activities that can be done at any time, such as, but not limited to: site security, surveillance, monitoring for weather protection, checking tarps, surveying, landscaping, painting, and walking on and around the site and structure. These types of activities are not considered construction and will not be limited by the conditions imposed on this Master Use Permit.

In addition, after the building is fully enclosed, interior work may be done at any time in compliance with the Noise Ordinance with no pre-approval from the Department.

### Construction Traffic

The proposed project would likely generate a noticeable amount of construction traffic on surrounding roadways. Construction-related traffic impacts of the proposed action would vary throughout the construction process. Some activities will require use of the local roadways and intersections surrounding the site. The greatest activity will be related to demolition of existing buildings on site and site grading. Deliveries of other construction materials are also to be expected during the course of construction. Approximately 15,000 to 20,000 cubic yards (cy) of dirt would be excavated during project activities. The most noticeable traffic activity would be related to demolition of existing buildings on site and re-grading portions of the site (e.g. the athletic fields). The exporting effort is expected to occur over approximately three months beginning in year 2006 (approximately 63 working days). The export of both demolition debris and excavated material would require approximately 31 truckloads per day and estimate eight truck trips per hour (4 inbound, 4 outbound).(Adolfson, 2004).

Trucks carrying material from the site would be most noticeable and would likely use 23<sup>rd</sup> Avenue, 25<sup>th</sup> Avenue, E Alder Street, and/or E Cherry Street. Although the truck traffic would be noticeable; the increase would represent 1% or less of overall midday traffic. (Adolfson, 2004)

Since the school population would not be on site during construction, this disruption is not anticipated to be significant. DPD-approved Truck Trip Plan that regulates the routes of trucks carrying project-related materials is required, in order to limit area impacts as much as possible and the times during which they may travel sufficiently to avoid causing an unacceptable deterioration of intersection levels of service. A further condition will require that this Truck Trip Plan be followed at all times. As so conditioned, the adverse impacts of construction traffic are adequately mitigated.

### Parking

Construction workers are expected to arrive at the site in private vehicles. Construction-related vehicles will also be driven to the site and left for periods of time. Construction employee parking is anticipated to occur along the adjacent on-street parking areas on the west side of 25<sup>th</sup> Avenue and the north side of E Alder Street and on-site when available. Site staging would be located at the south end of the site, approximately where the play field is now located.

In general terms, the number of construction workers on the project site will be at a medium level during demolition, low during grading activities, and the highest during the construction phase.

The addition of construction worker vehicles to area streets would be offset by the absence of student and faculty parking at the site during construction. No SEPA policy based conditioning of short term parking impacts is warranted.

### Air Quality

Demolition, grading and construction activities each may create adverse air quality impacts in the surrounding area. The Puget Sound Clean Air Agency (PSCAA) regulations require control of fugitive dust to protect air quality. A PSCAA permit is required for the removal of hazardous materials such as asbestos. The Seattle Stormwater, Grading and Pollution Control Ordinance regulates on-site grading activities and requires that soil erosion control techniques be initiated for the duration of the work.

Existing regulation is sufficient to control short-term air quality impacts. In order to insure that PSCAA reviews the proposed demolition, it is necessary to file a Notice of Intent to demolish with that agency. A condition of this MUP will be to file a PSCAA notice prior to issuance of a demolition permit.

### Long-Term Impacts

Long-term or use-related impacts are also anticipated from the proposal. These include: possible increase in light and glare; increased bulk and scale of the building; increased ambient noise due to increased human activity; and increased energy consumption. These long-term impacts are not considered significant.

### Traffic and Parking

Redevelopment of Garfield High School and changes related to parking are not expected to result in an increase in traffic along roadways adjacent to the site. Garfield High School has a current enrollment of 1630 students. The new school is being designed for a planned enrollment of 1,600 students.

Based on the capacity of the redeveloped school, the level of service (LOS) is anticipated to remain at LOS B during the a.m. peak period (7:00 a.m. to 9:00 a.m.) and LOS C during the p.m. peak period (2:00 p.m. to 3:00 p.m.), which is within the acceptable range for the City of Seattle (LOS D).

The redeveloped site will provide 109 on-site parking spaces (an additional 21 spaces from existing conditions). The additional on-site parking stalls will help reduce the demand for off-site parking impacts from the school use. Bus loading is proposed to move on-site in a bus lane adjacent to 23<sup>rd</sup> Avenue, reducing the impact on E. Alder St.

The traffic analysis prepared for the Garfield High School Historic Renovation, Demolition and New Construction Supplemental Environmental Impact Statement indicates that parking in the vicinity of the school would be adequate to accommodate overflow parking from the school during evening events such as basketball games, concerts, and theater events. There are about 324 parking spaces available on the street that are near the school.

The Director finds that the provision of 109 on-site parking stalls (an increase of 21 stalls over current conditions) will help reduce the potential parking impacts of evening events. The traffic analysis completed for the project indicates that the existing supply of on-street parking, in addition to a new supply of 21 stalls on site, are sufficient to mitigate the parking impacts of events scheduled at the school.

### Historic

In 2003, the City of Seattle designated Garfield High School as a Seattle Landmark. The designation identified the following features of the building and site for preservation: the exterior of the 1923 building and 1929 addition. The following features of the interior of the 1923 building: the main entrance hall, the former art room (currently room 312), the murals in the former mechanical drawing room (currently room 310), the interior of the former library (currently Room 229); the four interior bay stair towers, the master clock in the administrative area, and the boys' and girls' gyms. In addition the site was also landmarked, excluding the 1962 gymnasium and Parks Department fieldhouse, the breezeways, the portables, the two north parking lots, and the playfield and running track area. A Certificate of Approval is required for changes to the landmarked properties.

On December 15, 2004, the Seattle Landmarks Board approved the preliminary design of the proposal as consistent with its landmark designation. Pursuant to the City's SEPA policy for Historic and Cultural Resources (Section 25.05.675), the determinations of the Landmarks Preservation Board are deemed to offer sufficient mitigation for impacts to historic landmarks. Pursuant to the City's SEPA policy for Historic and Cultural Resources (Section 25.05.675), the determinations of the Landmarks Preservation Board are deemed to offer sufficient mitigation for impacts to historic landmarks.

### Other Impacts

Several adopted codes, ordinances and agencies will appropriately mitigate the other use-related adverse impacts created by the proposal. Specifically, these are the Puget Sound Clean Air Agency (increased airborne emissions); the Seattle Land Use Code (increased light and glare from the new lighting of the parking lot), and the Seattle Energy Code (long-term energy consumption).



## **CONDITIONS – SEPA**

### **Prior To Construction Or Grading Permit Issuance**

1. File a Notice of Intent to Demolish with PSCAA.
2. Develop and obtain DPD approval of a Construction Truck Trip Plan.

### **During Construction**

The following condition(s) to be enforced during construction shall be posted at the site in a location on the property line that is visible and accessible to the public and to construction personnel from the street right-of-way. These conditions shall be posted along 23<sup>rd</sup> Avenue, E. Alder St and 25<sup>th</sup> Avenue. The conditions will be affixed to placards prepared by DPD. The placards will be issued along with the building permit set of plans. The Placards shall be laminated with clear plastic or other weather proofing material and shall remain in place for the duration of construction.

3. Construction activities, other than those taking place within the enclosed building, are limited to the hours of 7:00 A.M. to 6:00 P.M. on non-holiday weekdays and 8:00 A.M. to 5:00 P.M. on Saturdays. It is recognized that there may be occasions when critical construction activities of an emergency nature, related to safety or traffic issues may need to be completed after regular construction hours as conditioned herein. Therefore the Department reserves the right to approve waivers of this construction hours restriction. Such waivers must be requested at least three business days in advance, and approved by the Department on a case-by-case basis prior to such work. After the building is fully enclosed, on a floor-by-floor basis, interior work may be done at any time in compliance with the Noise Ordinance with no pre-approval from the Department.
4. Follow the DPD approved Truck Trip Plan.

Signature: (signature on file) Date: August 15, 2005  
Scott Kemp, Senior Land Use Planner  
Department of Planning and Development