



City of Seattle

Department of Planning and Development

Diane M. Sugimura, Director

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

DPD Application Number: 3014772

Clerk's File Number: CF 314305

Applicant Name: Greg Stamatiou for Seattle City Light (SCL)

Address of Proposal: 1250 Denny Way

SUMMARY OF PROPOSED ACTION

Council Land Use Action to establish a city facility (Denny Substation) on two of three City Light-owned parcels at a site on the edge of the Cascade Neighborhood. Project includes installation of a screen wall, control building, maintenance building, transformer units and other electrical and mechanical equipment. The vehicle access for the facility is to be located on John Street, across from the intersection of Pontius Avenue North and John Street. Project also includes street vacation for the portion of Pontius Avenue North to the west of the site (between Denny Way and John Street). Draft and Final Environmental Impact Statements (dated March 27, 2014 and January 22, 2015) have been prepared by Seattle City Light.

Although the land use approval is related only to the substation, the proposal addressed by the project's EIS includes all interconnected project components and actions. Accordingly, the EIS evaluates construction and operation of:

- a new electrical substation
- a new underground electrical network distribution system to serve the South Lake Union area
- a new, primarily underground high-voltage transmission line to connect the new Denny Substation to the existing Massachusetts Substation in the South of Downtown (SODO) neighborhood and
- related electrical equipment (inductor) at the Broad Street Substation.

All of these project components would be constructed in stages between late 2015 and approximately 2020.

Substation construction (the first phase - needed to build the screen wall and preliminarily serve the new distribution network) would likely begin in early 2016 and take approximately 24 months to complete.

The following Land Use approvals are required:

- **COUNCIL CONCEPT APPROVAL OF A CITY FACILITY**
To change/establish use of Electrical Transmission/Distribution Substation in Seattle Mixed Use zone [Chapter 23.76.064](#)
- **COUNCIL ACTION:**
 - **Council Action** to allow a greater setback than permitted in a SM zone.
 - **Council Action** to allow a waiver or modification to the facade transparency requirements in a SM zone.
 - **Council Action** to allow a waiver or modification to blank facade limits in a SM zone.
 - **Council Action** to allow a waiver or modification to green factor requirements in a SM zone.
 - **Council Action** to allow a waiver or modification to the minimum facade height in a SM zone.
 - **Council Action** to allow a waiver to the accessory surface parking requirements in a SM zone.
 - **Council Action** to allow a waiver or modification to the parking and loading access requirements in a SM zone.
- **STATE ENVIRONMENTAL POLICY ACT (SEPA) [Chapter 25.05](#)** (substantive conditioning)¹

SEPA DETERMINATION

☐ Exempt ☐ DNS ☐ MDNS ☒ EIS

☐ DNS with conditions

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

BACKGROUND AND PROPOSAL

The Seattle City Light 2013–2018 Strategic Plan establishes a course for how City Light will best meet its customers’ current and future needs for the next six years. The Denny Substation (identified in the Plan as North Downtown Substation) is listed as a strategic investment consistent with one or more of the plan’s objectives. The Denny Substation project is proposed in order to provide reliable electrical service for the fast-growing South Lake Union and Denny Triangle areas, and to enable the City to meet the land use planning goals established for the area by the *South Lake Union Urban Center Neighborhood Plan*.

The project would extend electrical network distribution system service in and around the South Lake Union area, and provide added capacity to serve existing distribution systems in the Denny Triangle and First Hill areas, while creating options for meeting existing and future system capacity needs. The project would also install equipment to help regulate regional power flows.

The project site shown in Figure 1 is bounded by Denny Way to the south, a public alley to the east (with a Plymouth Housing facility and a commercial property directly adjacent), John Street to the north, and Minor Avenue and the Brewster Apartment Building to the west. The Brewster Apartments, owned and operated by Capitol Hill Housing, abuts the Pontius Avenue North right-of-way that City Light proposes to vacate.

Figure 1 Proposed Substation – Location and General Layout



The substation concept is an open-air facility (enclosed by a screen wall on four sides and not roofed), designed by NBBJ Architects. The substation would contain transformers and associated equipment (e.g., switchgear, grounding bank, and inductors) and would be developed in phases. As electrical loads expand over time, equipment would be added to the substation to maintain reliable electrical service, but the outer footprint of the substation would be constructed during the first phase and would not be expanded. Dates for future phases are not currently known and will depend on electrical load growth. All electrical lines entering and exiting the substation (both transmission and distribution) would be underground. The substation site would also incorporate public open spaces with an off-leash dog area, and public seating and walking areas, along with views into the substation and other amenities.

It is anticipated that construction staging for the substation itself would occur almost completely on-site. Some construction work would occur in adjacent roadways to install the distribution ductbanks that would convey electrical power away from the site and the transmission lines that would feed the substation.

Seattle Design Commission

As a City facility, the proposal was subject to review by the Seattle Design Commission (SDC) in their role to advise project proponents and help foster well-designed civic projects. The SDC reviewed

several iterations of the design over the past year and provided input and approved the design with recommendations on February 19th 2015. For complete SDC actions and comments, the approved minutes from the meetings are available on the City of Seattle website located at

<http://www.seattle.gov/dpd/cityplanning/designcommission/projectreviews/currentprojects/dennysubstation/whats happening/default.htm>

ANALYSIS – COUNCIL LAND USE ACTION

Recommendation criteria to Council are outlined in [SMC 23.76.050-A](#) and require the Director to write an evaluation of the proposal based on the standards and criteria for the approval sought and consistency with the applicable City policies. The following analysis and information is provided by the DPD Director as required for this Type V application.

1. The written recommendations or comments of any affected City departments and other governmental agencies having an interest in the application;

City Light instituted an Interdepartmental Team (IDT) to facilitate and streamline review of the project design and EIS by other city departments. Along with regular project updates, City Light provided iterations of design plans and specifications for review by these departments: DPD, FAS, Parks, SDOT, and SPU. All of the design review and SEPA comments by these agencies were considered and addressed through the design process to the satisfaction of the agencies. These city departments did not submit any comments to DPD during the MUP comment period. These agencies did not submit any comments on the published DEIS.

City Light has coordinated with two external governmental agencies in particular regarding the substation: King County Metro and King County Wastewater Treatment Division. In addition, the government agencies with jurisdiction received all MUP and SEPA notices. Only King County Metro (as noted below) submitted comments about the substation project itself.

Comment 1 – King County Metro

The commenter expressed concerns with the construction-phases of the proposal. They requested that mitigation should address impacts to transit service

Response to Comment

City staff acknowledged the comments by email. Construction activities will be managed to minimize potential disruptions to transit service.

2. Responses to written comments submitted by interested citizens;

Public Comment

The DPD comment period for this proposal was from April 24 through May 7, 2014 and the five public comments received are summarized as follows:

Comment 1

The commenter expressed concern regarding the vacation of Pontius Avenue North (between John Street and Denny Way) and how this would increase traffic for the intersection of John St and Minor

Ave. How Yale Avenue N and Thomas St are already a ‘bottleneck’ from I-5 and nearby streets. How the street vacation removed 40 to 45 vehicles spaces from the street supply.

City staff requested traffic and parking information during their review. The review of the proposal determined that these impacts can be addressed by the design of the proposal. Traffic patterns will adjust over time to the proposal. Improvements to the abutting pedestrian crosswalks will result in better use of vehicle parking near the proposal.

Comment 2

The commenter expressed concern regarding pedestrian safety on the abutting and adjacent streets. They also commented on how the ‘screening wall’ should be setback from the sidewalks.

The Design Commission and City staff reviewed the proposal during their reviews; and determined that these impacts can be addressed by the design of the proposal. All abutting walkways will be maintained or be improved for pedestrian safety. The ‘screening wall’ has been design with pedestrian safety in mind. Improvements to the abutting pedestrian crosswalks will result in better pedestrian circulation on the streets.

Comment 3

The commenter expressed concern regarding increase noise and light for their occupants.

The Design Commission and City staff reviewed the proposal during their reviews. City staff requested proposed noise mitigation measure to minimize the impacts and determined that these impacts can be addressed by the proposal. Construction impacts from noise and light can be mitigated and will be monitored and enforced during all phases of construction. Operational impacts from noise and light will be code compliant.

Comments 4 and 5

The commenters requested an extended comment period. The comment period was extended.

Public Comment Response

City staff acknowledged the comments by email and addressed the comments in the review of the proposal.

Each commenter has been added to the notice list for the proposal.

3. *An evaluation of the proposal based on the standards and criteria for the approval sought and consistency with applicable City policies;*

The following is a summary of the applicable standards and their evaluation based on City Policies:

- Analysis under Seattle’s Comprehensive Plan
- Analysis under Seattle’s South Lake Union Neighborhood Plan
- Analysis under applicable development standards

Seattle Comprehensive Plan and South Lake Union Urban Center Neighborhood Plan

The project is consistent with all applicable policies of these plans. Table 1 provides the details of planning policy analysis.

Table 1 Evaluation of Planning Policy Consistency

Planning Document		Substation Consistency Analysis
Seattle Comprehensive Plan	<p><u>Urban Village Goals and Policies:</u></p> <ul style="list-style-type: none"> • (UVG10) Maximize the benefit of public investment in infrastructure and services, and deliver those services more equitably by focusing new infrastructure and services, as well as maintenance and improvements to existing infrastructure and services, in areas expecting to see additional growth, and by focusing growth in areas with sufficient infrastructure and services to support that growth. • (UV7.5) Coordinate public and private activities to address transportation, utilities, open space and other public services to accommodate the new growth associated with subarea rezones (e.g., in transit station areas) that result in significant increases in density • (UV55) Seek to provide public open space in conjunction with major public projects such as utility and transportation projects, with the amount of open space based on the size of the project, open space needs of the adjacent areas, and the opportunities provided by the particular project. 	<p><u>Urban Village:</u></p> <ul style="list-style-type: none"> • Consistent with UVG10: The north-central area of downtown Seattle, particularly South Lake Union, Belltown, Denny Triangle, and the north end of the Central Business District, has been experiencing rapid redevelopment over the past 15 years, consistent with the City's vision to create jobs and add retail services and housing in the Center City. The substation would provide the necessary reliability of service to serve expected and desired redevelopment in South Lake Union and Denny Triangle areas. • Consistent with UV7.5: The zoning in South Lake Union was recently changed to allow for increased building heights and residential densities. The substation would provide the necessary reliability of service to serve the potential increase in growth as allowed per the rezone. • Consistent with UV55: The substation would be the most consistent with UV55 because public open space would be incorporated on-site along John Street, Minor Avenue North, and the elevated pathway along Denny Way and the alley. Open space uses could include an off-leash area and community gardens
	<p><u>Transportation Goals and Policies:</u></p> <ul style="list-style-type: none"> • (TG17) Manage the parking supply to achieve vitality of urban centers and villages, auto trip reduction, and improved air quality. • (T37) Consider establishing parking districts that allow for neighborhood based on- and off-street parking management regulations to help meet urban center mode split goals. • (T38) Use low-cost parking management strategies such as curb space management, shared parking, pricing, parking information and marketing and similar tools to encourage more efficient use of existing parking supply before pursuing more expensive off-street parking facility options. • (T39) Restrict on-street parking when necessary to address safety, operational or mobility problems. In urban centers and urban villages where such restriction is being considered, the pedestrian environment and transit operations are of primary concern, but decisions should also balance the use of the street by high-occupancy vehicles, bicycles and motor vehicles; access to 	<p><u>Transportation:</u></p> <ul style="list-style-type: none"> • Consistent with TG17: On-street and off-street parking eliminated as a result of the project would not be replaced. As a result, this project could contribute to auto trip reduction since it is located in an area served by public transit and improvements will be made for pedestrian movement around the substation site. • Consistent with T37: The project would not affect the ability to establish parking districts. • Consistent with T38: The project would reduce parking supply and does not propose to add off-street parking. • Consistent with T39: The project would eliminate on-street parking on Pontius Avenue North. John Street will be narrowed consistent with Green Street standards which will improve conditions for pedestrians and bicyclists. • Consistent with T40: The project is prioritizing curb space surrounding the substation site consistent with this policy. • Consistent with T42: The project is not a

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	<p>local businesses; control of parking spillover into residential areas; and truck access and loading.</p> <ul style="list-style-type: none"> • (T40) In commercial districts prioritize curb space in the following order: <ol style="list-style-type: none"> 1. transit stops and layover, 2. passenger and commercial vehicle loading, 3. short-term parking (time limit signs and paid parking); 4. parking for shared vehicles; and 5. vehicular capacity. • (T42) During construction or implementation of new transportation projects, consider replacing short-term parking only when the project results in a concentrated and substantial amount of on-street parking loss. 	<p>transportation project but would vacate a street. On-street parking would be reduced as a result of the project. Since the project is located in an area served by public transit and improvements will be made for pedestrian movement around the substation site, the substation is considered to be consistent with on-street parking policies.</p>
	<p><u>Economic Development Policies</u></p> <ul style="list-style-type: none"> • (EDG7) Foster a positive business climate in Seattle by ensuring adequate public services, infrastructure, and high-quality customer service. • (ED12) Seek ways to create a local business environment that promotes the establishment, retention, and expansion of high-technology industries in the city. Where possible, look for opportunities to link these businesses to existing research institutions, hospitals, educational institutions and other technology businesses. • (ED41) Seek to coordinate, where appropriate, City investment in utilities, transportation and other public facilities with business, employment and economic development opportunities. 	<p><u>Economic Development:</u></p> <ul style="list-style-type: none"> • Consistent with EDG7: The substation would create a reliable source of electricity for the business community. It would serve expected development in South Lake Union and Denny Triangle. • Consistent with ED12: High-technology industries have a higher reliance on continuous electricity service than other industries. A new substation and distribution system may help attract such industries to South Lake Union and the Denny Triangle. • Consistent with ED41: Several large customers are anticipated to come on-line during the fourth quarter of 2016 and early 2017. Broad Street Substation is reaching its distribution load capacity limit, and many of the anticipated large loads are too far to serve effectively from Broad Street Substation. The Denny Substation Project would provide reliable service to meet these new electrical load needs.
	<p><u>Utility Goals and Policies</u></p> <ul style="list-style-type: none"> • (UG1) Provide reliable service at lowest cost consistent with the City's aims of environmental stewardship, social equity, economic development, and the protection of public health. • (UG2) Maintain the service reliability of the City's utility infrastructure. • (UG5) Operate City utilities consistent with regional growth plans. • (U3) Maintain the reliability of the City's utility infrastructure as the first priority for utility capital expenditures. • (U5) Coordinate City utility capital expenditure planning with capital investment planning by other City departments. • (U18) Work with neighborhood and community representatives in siting utility facilities. 	<p><u>Utility:</u></p> <ul style="list-style-type: none"> • Consistent with UG1, UG2, UG5, and U3: The Denny Substation would provide the most viable, safe, reliable, and cost-effective way to meet emerging electrical load in the north downtown Seattle area. A new substation would provide the needed capacity and flexibility to manage load growth in other nearby urban centers and also alleviate the electrical system congestion between the Broad Street, Canal, University, and East Pine substations. • Consistent with U5: City Light is coordinating required water main relocations with planned upgrades by SPU. • Consistent with U18: City Light considered several sites for locating substation • Consistent with U19: The Denny Substation is undergoing review by the Seattle Design

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	<ul style="list-style-type: none"> (U19) Continue to subject all above-grade City utility capital improvement projects to review by the Seattle Design Commission. (U20) Consider opportunities for incorporating accessible open space in the siting and design of City utility facilities. 	<p>Commission (Design Commission) for consistency with Seattle Land Use Code, the Seattle Comprehensive Plan, the South Lake Union Urban Design Framework, the South Lake Union Neighborhood Plan, and the Denny Way Streetscape Concept Plan.</p> <ul style="list-style-type: none"> Consistent with U20 since public open space would be provided.
<p>South Lake Union Urban Center Neighborhood Plan</p>	<p><u>Seattle City Light: Anticipated Future Facilities (Utilities Appendix A)</u></p> <ul style="list-style-type: none"> Within the Comprehensive Plan's 20 year timeframe a new principal substation will be necessary downtown, with an underground transmission line connection to the South substation. New substations also may be built in the next five to twenty years at Interbay, in the SODO area and in South Lake Union, depending on load growth projections and emerging real construction. <p><u>Neighborhood Character Goals, Policies and Strategies:</u></p> <ul style="list-style-type: none"> (Policy 3) Encourage public and private developers to consider existing neighborhood character when designing projects adjacent to parks and historical sites. <ul style="list-style-type: none"> Use the South Lake Union Design Guidelines to support development that reflects existing and desired neighborhood character (Strategy 3c). (Policy 5) Encourage designs of public spaces and private buildings that can accommodate the needs of people across a range of ages and abilities, allowing residents to age in place. <ul style="list-style-type: none"> Consider accessibility in reviewing public projects (Strategy 5c). (Policy 9) Support the growth of innovative industries in South Lake Union including biotechnology, information technology, environmental sciences and technology, and sustainable building. <i>Note: There is disagreement about this policy. Some of the residents of Cascade neighborhood object to providing support to and attracting the biotechnology industry to the South Lake Union neighborhood and would prefer that the policy state "Support the growth of innovative industries in South Lake Union" without preference given to particular industries.</i> <ul style="list-style-type: none"> Create reliable power and telecommunications networks to attract innovative industries and businesses (Strategy 9d). Innovative industries sometimes have higher demand for power or telecommunications networks than traditional industries. As the neighborhood develops, utilities should work with the neighborhood to provide networks that will meet the neighborhood's needs. (Policy 13) Seek to incorporate the arts into the design of public projects and the use of public spaces. <ul style="list-style-type: none"> Maximize the potential for public art in public capital improvement projects by developing a public art plan 	<p><u>Seattle City Light: Anticipated Future Facilities</u></p> <ul style="list-style-type: none"> Consistent with identified future facility for downtown. <p><u>Neighborhood Character:</u></p> <ul style="list-style-type: none"> Consistent with Policy 3: The Denny Substation is undergoing review by the Design Commission. Consistent with Policy 5: The open space areas could provide a range of activities, from passive-seating areas to more active like off-leash dog areas. The areas would be accessible from Denny Way, Minor Avenue North, and John Street sidewalks. Consistent with Policy 9: Innovative industries and businesses have a higher reliance on continuous electricity service than other industries. A new substation and network system might help attract such industries to South Lake Union and the Denny Triangle. Consistent with Policy 13: The upper section of the exterior of the proposed substation structure would be composed of a ventilated-screen, translucent glass assembly with an opportunity to incorporate art. A City Light artist would be engaged at the 30 percent design phase to incorporate art work into the project.

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	<p>(Strategy 13a).</p> <ul style="list-style-type: none"> ○ Use a Public Art Advisory Committee process to expedite review of art components of public/private projects (Strategy 13b). ○ Collaborate with community arts organizations on programming public spaces (Strategy 13c). 	
	<p><u>Transportation Goals, Policies and Strategies</u></p> <ul style="list-style-type: none"> ● (Policy 18) Promote a system of safe pedestrian and bicycle connections linking key activity areas and destinations, such as open spaces, schools and arts facilities. <ul style="list-style-type: none"> ○ Design streetscapes to increase pedestrian interest, accessibility and safety (Strategy 18a). Wider sidewalks, landscaping, street trees, public art, curb bulbs and pedestrian signals can all help to create a more attractive and safe pedestrian environment. Key pedestrian routes that warrant additional attention include Denny Way. ○ Strategy 18d: Encourage sidewalk enhancements along designated “green streets.” ● (Policy 22) Explore transportation improvements to link South Lake Union with its surrounding neighborhoods. <ul style="list-style-type: none"> ○ Provide safe pedestrian crossings in the Denny Way corridor (Strategy 22c). Pedestrian improvements in the Denny Way corridor that could increase pedestrian safety and accessibility include: intersection improvements, including curb bulbs and pedestrian countdown signals. 	<p><u>Transportation:</u></p> <ul style="list-style-type: none"> ● Consistent with Policy 18: The project’s frontage along Denny Way would be improved from existing conditions consistent with SDOT’s right-of-way manual and include a wider concrete sidewalk, curb, gutter and street trees. An elevated pedestrian pathway would be constructed along Denny Way and continue north along the alley. Buffer planting between the sidewalk and the pedestrian ramp would be provided to add visual interest. Curb bulbs would be incorporated at the Denny Way and Minor Avenue North intersection and the Minor Avenue North and John Street intersections. The open space along John Street could consist of seating, bicycle racks, shade trees, accent planting, and special paving. A narrower street section for John Street would be constructed consistent with Green Streets. ● Consistent with Policy 18: Street trees would be included on the street frontages of Denny Way and John Street. Street trees along Minor Avenue North would be limited due to conflicts with proposed underground duct banks. Curb bulbs would be incorporated at the Denny Way and Minor Avenue North intersection and the Minor Avenue North and John Street intersections. No pedestrian signals are proposed. Vine plantings along the substation structure wall might also be used to help screen the substation from pedestrians. A narrower street section for John Street would be constructed consistent with Green Streets. ● Consistent with Policy 22: Curb bulbs and other pedestrian enhancements are proposed at two locations crossing Denny Way (at Minor Avenue North and at Stewart Street) to facilitate pedestrian crossings between the South Lake Union and Denny Triangle neighborhoods.

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	<p><u>Parking Goals, Policies and Strategies</u></p> <ul style="list-style-type: none"> • (Policy 20) Develop flexible off -street parking requirements that provide parking adequate to a building’s occupants, and encourage the use of transit, walking, bicycling and other non-automotive modes. <ul style="list-style-type: none"> ○ Reduce or eliminate minimum off -street parking requirements (Strategy 20A). ○ Allow flexibility for shared use of off -street parking (Strategy 20b). ○ Support efforts to share parking between businesses, residential buildings and public amenities (Strategy 20c). ○ Use Transportation Demand Management activities to balance parking demand and supply (Strategy 20D). ○ Consider maximum parking requirements for high-commuter uses (Strategy 20E). • (Policy 21) Encourage the efficient use of on-street parking for neighborhood businesses, residents and attractions through innovative parking management and pricing strategies. <ul style="list-style-type: none"> ○ Implement a flexible on-street parking meter program throughout the neighborhood that is able to adapt quickly and efficiently to changes in parking demand resulting from new businesses, offices and residences (Strategy 21a). ○ Eliminate time limits for most on-street parking spaces and charge hourly market rates (Strategy 21B). ○ Establish a “pilot” residential parking zone to provide a minimum amount of exclusive parking for residents of existing Cascade buildings that have no onsite parking (Strategy 21d). 	<p><u>Parking:</u></p> <ul style="list-style-type: none"> • Consistent with Policy 20: Substation would not provide additional off-street parking since only one vehicle would be used to access the substation per day. Although the substation could have a learning center and/or community or retail space, it is expected that the majority of visitors to the site would come from within the local neighborhood and walk to the site. The project would permanently eliminate the existing surface parking lot on Parcel 1. During the property surplus process, Parcel 3 would revert back to an off-street parking lot. The off-street public parking lots located in the site vicinity would likely accommodate some of the parking demand that was using Parcel 1. Since the project is located in an area served by public transit and improvements will be made for pedestrian movement around the substation site, the facility is considered to be consistent with off-street parking policies. • Consistent with Policy 21: The substation would permanently remove on-street parking spaces on Pontius Avenue North, but would not hinder innovative parking management and pricing strategies. Since the project is located in an area served by public transit and improvements will be made for pedestrian movement around the substation site, the facility is considered to be consistent with off-street parking policies.
	<p><u>Parks and Open Space Goals, Policies and Strategies</u></p> <ul style="list-style-type: none"> • (Policy 29) Consider a variety of tools, including regulatory measures and joint projects with public agencies and private organizations, to provide for new open spaces to support the growth of the neighborhood. <ul style="list-style-type: none"> ○ Explore park and recreational opportunities associated with potential substation improvements (Strategy 29b). Seattle City Light is planning to develop a substation site to accommodate projected growth in the planning area. Once City Light has selected a site, the two departments should evaluate the feasibility of co-locating recreational facilities with the substation. If recreation space is not feasible, consider other public facilities as potential co-locators with the substation. ○ Partner with public agencies and private organizations to develop open spaces (Strategy 29d). ○ Consider open space and other community facilities identified by this plan as the only public benefits when granting right-of-way vacations (Strategy 29e). Streets and alleys play a number of roles, including that of providing spaces between buildings. If the 	<p><u>Parks and Open Space:</u></p> <ul style="list-style-type: none"> • Consistent with Policy 29: Open space is proposed along John Street and Minor Avenue North to mitigate the impacts of vacating Pontius Avenue North. The elevated pathway would be accessible to the public. • Consistent with Policy 31: Open space would be provided along John Street, and along Minor Avenue North, which would receive sunlight at noon during the winter and summer and in the mornings during the summer, and the elevated pathway would receive sunlight year-round except during winter mornings. Landscaping in public areas on-site and along adjacent street frontages would be consistent with Crime Prevention through Environmental Design (CPTED) principles to maximize the safety and security of the facility, as well as the general public, around the edges of the facility or within open space areas. • Consistent with Policy 32: The site creates a

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	<p>City vacates streets or alleys, mitigate the impacts of the vacation by requiring the creation of open space, or, if open space isn't appropriate for the site, by providing a community facility that is called for by this plan.</p> <ul style="list-style-type: none"> • (Policy 31) Use visual and physical connections between open spaces, adjacent streets and surrounding activities to stimulate positive social interactions. <ul style="list-style-type: none"> ○ Try to site and design open spaces to receive as much direct, year round sunlight as possible (Strategy 31a). ○ Promote Crime Prevention Through Environmental Design (CPTED) principles in the design of facilities (Strategy 31b). ○ Design facilities to be physically and visually accessible from the adjacent street (Strategy 31c). ○ Plan for parks and open spaces to be adjacent to active uses such as shops, restaurants and community organizations (Strategy 31d). • (Policy 32) Identify opportunities for alternatives to traditional open space, including green streets and recognition and use of Lake Union as recreation and open space. <ul style="list-style-type: none"> ○ Explore integrating art features and spaces for performances into existing and future open spaces (Strategy 32d). 	<p>unique open space with its off-leash area, exercise loop, green street features, and proposed incorporated artwork (Ned Kahn and Lead Pencil Studios pieces). The site is effectively an entryway into the cascade Neighborhood, and enhances connectivity through this area to and between other open spaces.</p>
	<p><u>Sustainable Development Goals, Policies and Strategies</u></p> <ul style="list-style-type: none"> • (Policy 43) Provide for a stable and reliable supply of electrical power to South Lake Union as a growing urban center. <i>Note: Some members of the community feel that this policy and its strategies should be a basic responsibility of the electrical utility and are not appropriate to the neighborhood plan. Others felt that issues with the current quality of service in the neighborhood or that the significant growth planned for the community resulted in special electrical service needs that warranted the inclusion of these issues in the neighborhood plan.</i> <ul style="list-style-type: none"> ○ Develop a utility infrastructure plan to address projected growth in load that: <ul style="list-style-type: none"> ▪ identifies essential infrastructure, including a substation; and ▪ evaluates a plan and financing for an underground network system that provide stability to the system (Strategy 43b). 	<p><u>Sustainable Development:</u></p> <ul style="list-style-type: none"> • Consistent with Policy 43: The substation would be part of a project to convert the existing overhead radial distribution system to an underground network distribution system to provide more reliable electrical service.

Seattle Development Standards

Substation Area Zoning

The Denny Substation site is currently zoned Seattle Mixed (SM 240/125-400). A substation is a permitted use in this zone (SMC 23.48.004). Table 2 below provides an analysis of applicable development standards.

Code Waivers

City Light seeks seven waivers of development standards in order to allow an electrical substation at the proposed location. Table 3 below provides detail and analysis of the requested waivers.

Green Streets (SMC 23.49.013)

John Street, adjacent and to the north of the substation site, is a designated Green Street. The purpose of a Green Street is to expand public open space and to reinforce desired land use and transportation patterns on appropriate City street rights-of-way. Green streets give priority to pedestrian circulation and open space over other transportation uses through a variety of design and operational treatments. Implementation of Green Street features is intended to allow waivers of other development standards (SMC 23.49.013). This project incorporates wider sidewalks (1,005 square feet more concrete sidewalk area) and 1,630 square feet of planter area and is consistent with Green Streets standards.

Table 2 Development Regulation Analysis Matrix

SMC Code Reference	Development Standards	Analysis/Relevant Scope	Compliant/Waiver for Development Standard	Justification/Requested Action
Title 23 Chapter 23.48 - Subtitle III Land Use Regulations				
SMC 23.32.006; SMC Zoning Map	SM-240/125-400; South Lake Union Urban Center	The project will comply with SM-240/125-400 zoning requirements as changed under Ordinance 124172. Note that the project site is not a designated environmental critical area.	Compliant, with requested waivers discussed below.	---
SMC 23.48.004	All uses are permitted outright, either as principal or accessory uses, except those specifically prohibited by Section 23.48.006 and those permitted only as conditional uses by Section 23.48.008	Utility Service Use (SMC 23.84A. Definitions)	Compliant.	Project consists of an open-air substation structure with a control building, maintenance building and shell spaces.
SMC 23.48.010-A	General structure height	Maximum Height 240'.	Compliant.	---
SMC 23.48.012	Upper-level setback requirements.	Structure height will not exceed the 75' height at which setback is required.	Compliant.	Structure is less than 75' high as measured along Denny Way. Regarding 23.86.006-B and Director's Rule 4-2012 measurement requirements - General Rule Formula 2 (Enclosing Rectangle) will be utilized for height measurements.

SMC Code Reference	Development Standards	Analysis/Relevant Scope	Compliant/Waiver for Development Standard	Justification/Requested Action
SMC 23.48.014-A.1	Primary Pedestrian Entrance - a primary building entrance shall be required from the street or street-oriented courtyards and shall be no more than three (3) feet above or below the sidewalk grade.	The Primary Pedestrian Entrances at the SW Shell Space (adjacent to the public benefit open space) and at the SE Shell Space (at Denny Way and adjacent alley) will comply.	Compliant.	The Substation is exempt from this requirement, since it is unoccupied and inaccessible to the public.
SMC 23.48.014-A.2	Minimum Façade Height	On Class 2 Pedestrian Streets, all facades shall have a minimum height of twenty-five (25) feet. On all other streets, all facades shall have a minimum height of fifteen (15) feet. The screen wall height along Denny Way is less than the required 25'. The intent of the code is for developments to maintain a continuity and contribute to the quality of public realm at the street edge.	Waiver for Development Standard <i>Southwest corner of screen wall is less than 25' high.</i>	A Council Waiver for Development Standard is requested for a segment of the facade along Denny Way that is below 25' due to the unique geometry of the project. See Table 2 for additional information.
SMC 23.48.014-A.3	Permitted Setbacks	Street-level Setback. Except on Class 1 Pedestrian Streets, structures may be set back up to twelve (12) feet from the property line subject to Exhibit 23.48.014 B. The setback along John Street exceeds 12', with a minimum setback of 11'-0" and an average setback of 22'-0". The setback along Minor Avenue exceeds 12', with a minimum setback of 16'-0" and an average setback of 84'-5".	Waiver for Development Standard <i>Screen wall structure is set back more than 12' from John Street and Minor Avenue due to substation program requirements and public open space provision.</i>	A Council Waiver for Development Standards requested for this City facility based on a Seattle Design Commission approved architectural design which has been a response to public benefit and urban merit features and SCL program requirements. See Table 2 for additional information.

SMC Code Reference	Development Standards	Analysis/Relevant Scope	Compliant/Waiver for Development Standard	Justification/Requested Action
MC 23.48.014-D.1	Façade Transparency Requirements	<p>Transparency requirements apply to all street-facing, street level facades, except for portions of structures in residential use, as follows:</p> <ul style="list-style-type: none"> a. For Class 1 and Class 2 Pedestrian Streets and Neighborhood Green Streets, ..., a minimum of 60 percent of the street facing facade must be transparent. b. For all other streets not specified in subsection 23.48.014.D.1.a, a minimum of 30 percent of the street facing facade must be transparent. c. If the slope of the street frontage of the facade exceeds 7.5 percent, the required amount of transparency shall be reduced to 45 percent of the street facing facade on Class 1 and Class 2 Pedestrian Streets and Neighborhood Green Streets, ..., and 22 percent of the street facing facade on all other streets. d. Only clear or lightly tinted glass in windows, doors, and display windows are considered transparent. Transparent areas shall allow views into the structure or into display windows from the outside. <p>Minor Ave. transparency is 44%, which complies with the 30% requirement. (Alley transparency, which has no requirement, is 36%.) Denny Way transparency is 54%, which does not comply with the 60% Class 2 Pedestrian Street requirement. John Street transparency is 18%, which does not comply with the 60% Green Street facade transparency requirement.</p>	<p>Waiver for Development Standard <i>Denny Way and John Street</i></p>	<p>The intent of the requirement is to provide a sense of activity, variety and interest along the streetscape. A Council Waiver for Development Standard is requested for the Transparency requirements. See Table 2 for additional information.</p>

SMC Code Reference	Development Standards	Analysis/Relevant Scope	Compliant/Waiver for Development Standard	Justification/Requested Action
SMC 23.48.014-D.2 SMC 23.48.014-D.3	Blank Façade Requirements	<p>2. Blank Facade Limits for Class 1 and 2 Pedestrian Streets.</p> <p>a. Blank facades shall be limited to segments fifteen (15) feet wide, except for garage doors which may be wider than fifteen (15) feet. Blank facade width may be increased to thirty (30) feet if the Director determines that the facade is enhanced by architectural detailing, artwork, landscaping, or other similar features that have visual interest. The width of garage doors shall be limited to the width of the driveway plus five (5) feet.</p> <p>3. Blank Facade Limits for all other streets.</p> <p>a. Blank facades shall be limited to segments thirty (30) feet wide, except for garage doors which may be wider than thirty (30) feet. Blank facade width may be increased to sixty (60) feet if the Director determines that the facade is enhanced by architectural detailing, artwork, landscaping, or other similar features that have visual interest. The width of garage doors shall be limited to the width of the driveway plus five (5) feet.</p> <p>Minor Ave. total blank façade length is 47% of street façade, which complies with the 70% maximum requirement. Minor Ave. has two segments which exceed the 30' blank façade limit. Denny Way total blank façade length is 37% of street façade, which complies with the 40% maximum requirement. Denny Way has 2 segments which exceed the 15' blank facade limit. John Street total blank facade length is 85% of street facade, which does not comply with the 40% maximum requirement. John Street has 3 segments which exceed the 15' blank facade limit.</p>	<p>Waiver for Development Standard <i>Denny Way, Minor Avenue, and John Street</i></p>	<p>A Council Waiver is requested for the Transparency requirements. See Table 2 for additional information.</p>

SMC Code Reference	Development Standards	Analysis/Relevant Scope	Compliant/Waiver for Development Standard	Justification/Requested Action
SMC 23.48.014-H.1	Through-block pedestrian connections for large lot developments	<p>Through-block pedestrian connections for large lot developments</p> <p>1. A through-block pedestrian connection meeting the standards of subsection 23.48.014.G.2 is required in the SM 85/65-125, SM 85-240, SM 85/65-160, SM 160/85-240, and SM 240/125-400 zones for development described as follows: (a) Within the block defined as the area enclosed by street rights-of-way, the lot area of the development is a minimum of 60,000 square feet, except that the area of lots separated only by an alley right-of-way may be combined for the purposes of calculating the minimum required lot area; (b) The lot area of the development abuts the two north-south avenues for a minimum linear distance of 120 feet along each avenue.</p>	Compliant.	Since the development does not abut two north-south avenues, it does not meet the description requiring a through-block pedestrian connection.
SMC 23.48.024-A.2 (SMC 23.86.019)	Green Factor	<p>Landscaping that achieves a Green Factor score of .30 or greater, pursuant to Section 23.86.019, is required for any lot with development containing more than 4,000 square feet of nonresidential uses. Seattle Green Factor is a score-based code requirement with the intent to increase and improve the amount and quality of landscaping in new development. Landscaping plays an important role in how new development looks and functions. Well-designed landscaping improves the look and feel of a neighborhood, reduces stormwater runoff, cools cities during heat waves, provides habitat for birds and beneficial insects, supports adjacent businesses, and can help to decrease crime.</p>	Waiver for Development Standard	A Council Waiver for Development Standard is requested. See Table 2 for additional information.

SMC Code Reference	Development Standards	Analysis/Relevant Scope	Compliant/Waiver for Development Standard	Justification/Requested Action
SMC 23.48.024-B	Screening and landscaping standards for specific uses	Where screening or landscaping is required for specific uses in subsection 23.48.024.C, the following types of screening and landscaping shall be provided: 1. Three foot high screening on street lot lines. The required screening may be provided as either: a. A fence or wall at least 3 feet in height; or b. A hedge or landscaped berm at least 3 feet in height. 2. Landscaping for setback areas and berms. Each setback area or berm required shall be planted with trees, shrubs, and grass or evergreen groundcover. Features such as pedestrian access meeting the Washington State Rules and Regulations for Barrier-Free Design, decorative pavers, sculptures or fountains may cover a maximum of 30 percent of each required landscaped area or berm. Landscaping shall be provided according to standards promulgated by the Director. Landscaping designed to provide treatment for storm water runoff qualifies as required landscaping.	Compliant.	Item 1 - compliance is provided by the architectural enclosure (screen wall). Item 2 - compliance is provided by (a) the SDOT accepted street tree design and project setback along Denny Way, (b) the landscape design along Minor Avenue and John Street, and (c) the walkway landscaping and accessibility.
SMC 23.48.024-C.4	Screening for Specific Uses	Fences or free-standing walls associated with utility services uses may obstruct or allow views to the interior of a site. Where site dimensions and site conditions allow, applicants are encouraged to provide both a landscaped setback between the fence or wall and the right-of-way, and a fence or wall that provides visual interest facing the street lot line, through the height, design or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features. Any fence or free-standing wall for a utility service use shall provide either: a. A landscaped area a minimum of 5 feet in depth between the wall or fence and the street lot line; or b. Architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features to provide visual interest facing the street lot line, as approved by the Director.	Compliant.	The design of the substation perimeter screen wall (approved by the Seattle Design Commission) meets the screening standards and the visual interest intent. The proponent's civil and landscape consultants have worked with SDOT to reach an acceptable street tree design and project setback along Denny Way.

SMC Code Reference	Development Standards	Analysis/Relevant Scope	Compliant/Waiver for Development Standard	Justification/Requested Action
SMC 23.48.024-D	Street tree requirements.	Street trees shall be provided in all planting strips. If it is not feasible to plant street trees according to City standards, either a landscaped setback a minimum of 5 feet deep is required along the street lot line, or landscaping other than trees may be located in the planting strip according to Department of Transportation standards. The street trees shall be planted in the landscaped area at least 2 feet from the street lot line if they cannot be placed within the planting strip.	Compliant.	While issues such as underground transmission lines have necessarily limited the location and density of street tree plantings, the proponent's civil and landscape consultants have worked with SDOT to find an acceptable street tree design.
SMC 23.48.026 (SMC 23.47A.018-B.1)	Noise standards.	All permitted uses are subject to the noise standards of Section 23.47A.018 .	Compliant.	Utility Service Use is not classified as a Major Noise Generator per SMC 23.47A.018 Noise Standards.
SMC 23.48.026 (SMC 23.47A.018-B.2)	Noise standards.	Exterior heat exchangers and other similar devices (e.g., ventilation, air-conditioning, refrigeration) are considered major noise generators.	Compliant.	This type of equipment within the substation will comply with noise standards based on SEPA EIS acoustical consultant report.
SMC 23.48.028 (23.47A.020)	Odor standards.	All permitted uses are subject to the odor standards of Section 23.47A.020 . The substation is not likely to generate odors of any type.	Compliant.	---
SMC 23.48.030 (23.47A.022 A)	Light and glare - Exterior lighting shielding	All permitted uses are subject to the light and glare standards of Section 23.47A.022 . Exterior lighting must be shielded and directed away from adjacent uses.	Compliant.	The external lighting of the facility has been designed to be shielded and directed away from adjacent uses.
SMC 23.48.030 (23.47A.022-D.1)	Light and glare - Exterior lighting pole height & maximum exterior lighting level	Exterior lighting on poles is permitted up to a height of forty (40) feet from finished grade, provided that the ratio of watts to area is at least twenty (20) percent below the maximum exterior lighting level permitted by the Energy Code.	Compliant.	---

SMC Code Reference	Development Standards	Analysis/Relevant Scope	Compliant/Waiver for Development Standard	Justification/Requested Action
SMC 23.48.030 (23.47A.022-E)	Light and glare - Glare diagrams	All permitted uses are subject to the light and glare standards of Section 23.47A.022. Glare diagrams that clearly identify potential adverse glare impacts on residential zones and on arterials were completed.	Compliant.	Glare analysis study indicates glare will not be an issue for residential neighbors or for east or westbound Denny Way traffic.
SMC 23.48.032 (SMC 23.54.015)	Required parking and loading.	Off-street parking spaces and bicycle parking are required according to Section 23.54.015, Required parking. Per SMC 23.54.015 Table A - line I, There is no minimum requirement for nonresidential uses, except hospitals, in urban centers or the Station Area Overlay District (3).	Compliant.	The substation is unoccupied - no defined parking will be provided. SCL staff will use on-street parking or equipment service access space within the walled substation facility.
SMC 23.48.034-A	Parking and loading location, access and curb cuts.	Parking accessory to nonresidential uses may be provided on-site and/or within 800 feet of the lot to which it is accessory, according to the provisions of Section 23.54.025, Parking covenants. Per SMC 23.54.015 Table A - line I, there is no minimum vehicle parking requirement for nonresidential uses, except hospitals, in urban centers or the Station Area Overlay District (3).	Compliant.	Loading and substation access will be provided along John St. for (a) for the existing Brewster Apartments, and (b) substation equipment access and maintenance.
SMC 23.48.034-E (23.54.030)	Parking and loading location, access and curb cuts.	Curb cut width and number 1. Permitted access shall be limited to one two-way curbcut. In the event the site is too small to permit one two-way curbcut, two one-way curbcuts shall be permitted. 2. Curbcut width and number of curbcuts shall satisfy the provisions of Section 23.54.030, except as modified in this Section 23.48.034.	Compliant.	Design of driveway and curb cuts complies.

SMC Code Reference	Development Standards	Analysis/Relevant Scope	Compliant/Waiver for Development Standard	Justification/Requested Action
SMC 23.48.034-C.3	Accessory Surface Parking	Accessory surface parking is prohibited unless separated from all street lot lines by another use within a structure. The intent of the requirement is to maintain attractive and inviting pedestrian urban spaces.	Waiver for Development Standard. An area that could be used for food trucks is proposed on the site adjacent to Minor Avenue in the open space.	A Council Waiver is requested for this facility to allow an on-site permanent food truck installation that is separated from the sidewalk. See Table 2 for additional information.
SMC 23.48.034-D.1	Parking and Loading Access	Access to parking and loading shall be from the alley when the lot abuts an alley if it would not create a significant safety hazard. The intent of the requirement is to maintain the character and amenity of Green Street aspirations for pedestrian environment. Access to loading for the facility is to be located along John Street.	Waiver for Development Standard. A service entrance into the structure is provided from John Street rather than the alley.	A Council Waiver for Development Standard is requested to allow service access from John Street in response to the unique requirements of a substation for at grade large equipment transport. See Table 2 for additional information.
SMC 23.48.034-E (SMC 23.54.030-F.2)	Curb cut width and number	Per SMC 54.030-F.2, for two way traffic, the minimum width of curb cuts is 22 feet, and the maximum width is 25 feet, except that the maximum width may be increased to 30 feet if truck and auto access are combined.	Compliant.	Design complies.
Title 25 Chapter 25.08 - Noise Control				
SMC 25.08.410-A	Exterior sound level limits	Commercial exterior sound level limit is 60 dB(A) (Leq)	Compliant.	Substation will comply with noise standards based on SEPA EIS acoustical consultant report.
SMC 25.08.410-B	Exterior sound level limits	During a measurement interval, Lmax may exceed the exterior sound level limits shown in subsection 25.08.410.A by no more than 15 dB(A).	Compliant.	Substation will comply with noise standards based on SEPA EIS acoustical consultant report.

SMC Code Reference	Development Standards	Analysis/Relevant Scope	Compliant/Waiver for Development Standard	Justification/Requested Action
SMC 25.08.420-B	Modifications to exterior sound level limits	For any source of sound that has a pure tone component, the exterior sound level limits established by this subchapter are reduced by 5 dB(A); provided, however, this 5 dB(A) reduction shall not be imposed on any electrical substation.	Compliant.	Substation will comply with noise standards based on SEPA EIS acoustical consultant report.
SMC 25.08.420-C	Modifications to exterior sound level limits	For any source of sound that is impulsive and not measured with an impulse sound level meter, the exterior sound level limits established by this subchapter are reduced by 5 dB(A).	Compliant.	Substation will comply with noise standards based on SEPA EIS acoustical consultant report.

Table 3 - Proposed Waivers of Development Standards

Request	Standard	Proposal	Rationale	Status/ Recommendation
Allow waiver of Minimum Façade Height	Per SMC 23.48.014-A.2 On Class 2 Pedestrian Streets, as shown on Map B, all facades shall have a minimum height of twenty-five (25) feet.	Southwest corner of screen wall is less than 25' high. From Adjacent grade. It is proposed to accept an average of 27' average façade height.	The east corner of the facade along Denny Way is below 25' due to the unique geometry of the project. The average facade height of the Denny Way facade is 27' to meet the intent of the requirement. The portion that drops below 25' is important to the architectural response to unique urban condition and project type. The site is located at a key node joining the Downtown, Capitol Hill and Cascade neighborhoods. The location is an intersection of the two major urban grids in Seattle and is a distinctive point of transition both in character and geometry for the neighborhoods. One of the opportunities of the project is to leverage the sense of open space and maximize the amenity of access to light and air. The segment along Denny that is lower has purposeful intent to acknowledge the axial relationship to Virginia Street as well as the intent to help welcome and draw pedestrian activity to the open space developed as part of the project and to maximize the amount of light that is available to the open space.	Recommend approval Seattle Design Commission also approved the concept of this waiver.

Request	Standard	Proposal	Rationale	Status/ Recommendation
Allow waiver of Permitted Setbacks	Per SMC 23.48.014-A.3: Street-level Setback. Except on Class 1 Pedestrian Streets, as shown on Map B, structures may be set back up to twelve (12) feet from the property line subject to the following (Exhibit 23.48.014 B).	The setback along John Street exceeds 12', with a minimum setback of 11'-0" and an average setback of 22'-0". The setback along Minor Avenue exceeds 12', with a minimum setback of 16'-0" and an average setback of 84'-5".	The increase in setback from John Street and Minor Avenue is due to substation program requirements and public open space provision for the architectural design, which has been developed as a response feature for public benefit and urban merit. Public open space is being provided on both John Street and Minor Avenue to create community connection and use. The substation also has a functional requirement to be set back from John Street to allow for large service vehicle access and clearance requirements.	Recommend approval Seattle Design Commission also approved the concept of this waiver.

Request	Standard	Proposal	Rationale	Status/ Recommendation
Allow waiver of Façade Transparency Requirements	Per SMC 23.48.014-D.1 Denny Way; Class 2 Pedestrian Street requirement 60% transparency. John Street; Green Street facade transparency is requirement 60% transparency.	Denny Way facility transparency is 54%. Transparency along John Street is 18%.	Due to current Federal (North American Electric Reliability Corporation or 'NERC') regulatory requirements for substations, visual access within the substation must be limited. As intent to meet the transparency requirements, translucent glazing has been provided to allow transmission of light and to create facade variations both in daytime and nighttime conditions. The changing geometrical planes of the facades are proposed to meet the intent of the requirement to create interesting variation and engaging authentic street level facade experiences that do not rely on false or kitsch storefront mimicry.	Recommend approval Seattle Design Commission also approved the concept of this waiver.

Request	Standard	Proposal	Rationale	Status/ Recommendation
Allow waiver of Blank Façade Limits	Per SMC 23.48.014-D.2 SMC 23.48.014-D.3 Minor Ave. has a 30' blank façade limit. Denny Way has a 15' blank facade limit. John Street has a 40% maximum blank façade and 15' blank facade limit requirement.	1) Minor Ave. has two segments which exceed the 30' blank façade limit. 2) Denny Way has 2 segments which exceed the 15' blank facade limit. 3) John Street total blank facade of 85% and 3 segments that exceed the 15' blank facade limit.	Due to (NERC) Federal regulatory requirements for substations, visual access within the substation must be limited. As intent to meet the transparency requirements, translucent glazing has been provided to allow transmission of light and to create facade variations both in daytime and nighttime conditions. The changing geometrical planes of the facades are proposed to meet the intent of the requirement to create interesting variation and engaging authentic street level facade experiences that do not rely on false or kitsch storefront mimicry.	Recommend approval Seattle Design Commission also approved the concept of this waiver.

Request	Standard	Proposal	Rationale	Status/ Recommendation
Allow waiver from Green Factor	Per SMC 23.48.024-A.2 (SMC 23.86.019) Landscaping that achieves a Green Factor score of .30 or greater, pursuant to Section 23.86.019, is required for any lot with development containing more than 4,000 square feet of nonresidential uses.	Green Factor Score of 0.17	<p>It is not feasible to meet the 0.3 green factor points for the area of the site due to programmatic infrastructure requirements that do not allow landscaping within the substation yard and brownfield redevelopment restrictions preventing on-site storm water infiltration. Given the limitations the project has strived to implement sustainable features as much as possible. The site includes bio-retention cells to collect storm water runoff from the alley. Additionally, a runnel collects storm water runoff from the open space, John Street streetscape, and elevated walkway. Planting soil depth has been increased to a minimum of 24" in tree, shrub, groundcover, and lawn areas which will increase infiltration and reduce storm water runoff. This will also provide a healthier growing environment for plants and reduce the overall amount of water needed for irrigation. Due to clearance requirements from underground utilities, tree planting is limited, but trees are provided wherever possible. The space above the substation needs to remain open, precluding a green roof, however, plantings similar to a green roof have been provided on the elevated walkway. Streetscape improvements include a continuous planting strip on all three sides of the site.</p> <p>Of the 37,671 sf of available open space inside the right-of-way, 100% is publicly accessible and 30% is planted with trees, shrubs, and groundcovers.</p>	<p>Recommend approval</p> <p>Seattle Design Commission did express concern about the potential for a waiver from this requirement to set a precedent for city facilities. DPD believes that this facility is unique in its siting and technical needs and challenges, and a waiver would not set a precedent.</p>

Request	Standard	Proposal	Rationale	Status/ Recommendation
Allow Limited Accessory Surface Parking	Per SMC 23.48.034-C.3 Accessory surface parking is prohibited unless separated from all street lot lines by another use within a structure.	Allowance for limited parking in a multi-use event zone, for vehicles such as, food trucks, book-mobile, and potential SCL service vehicle parking in the event of a utility emergency.	Allow limited on-site special event vehicle parking in areas that are separated from the sidewalk. This solution is intended to allow for a variety of events to be programmed on site. The zone is developed as a public benefit for activity that will encourage and enliven active urban space. The space allows the capability of flexible programmed use that includes limited authorized vehicle parking on site.	Recommend approval Seattle Design Commission also approved the concept of this waiver.
Parking and Loading Access	Per SMC 23.48.034-D.1 - Access to parking and loading shall be from the alley when the lot abuts an alley if it would not create a significant safety hazard.	A service entrance into the substation is provided along John Street rather than the alley.	Service access from John Street is in response to the unique requirements of a substation for at grade large equipment transport over the life of the facility. Alley access does not allow for the required turning radius of large transport vehicles. In addition changes in grade from the alley to the substation yard grade make vehicle entry to the substation infeasible. The John street Facade and service entry door are receiving special aesthetic treatments to minimize the appearance that there is a vehicle service entrance. The service door will be treated with special glazing as well as artistic environmental graphic installations to make the door a visual feature that will provide interest and add to the rich neighborhood context proposed on John St.	Recommend approval Seattle Design Commission also approved the concept of this waiver.

4. All environmental documentation, including any checklist, EIS or DNS

City Light, as the Lead Agency for the proposal, issued a Determination of Significance and Scoping Notice on October 8, 2012. Scoping was conducted and an EIS was completed in accordance with SMC 25.05. The DEIS was issued in March, 2014 and the 30-day comment period ended on April 26, 2014. 18 sets of written public comments on the DEIS were received by the lead agency and 11 people provided oral comments during testimony at the April 16th DEIS public hearing. A Final EIS was issued on January 22, 2015.

The DEIS addresses the following SEPA elements of the environment: Aesthetics, Noise, Transportation, Land Use and Housing, Air Quality and Greenhouse Gases, Historic and Cultural Resources, Hazardous Materials, Electric and Magnetic Fields (EMF), Energy and Natural Resources, Water Resources, and Utilities. The DEIS includes 3 alternatives for the new Transmission Line and 3 alternatives for the substation.

The FEIS includes information on a substation alternative site and adds analysis of Public Services, which was not addressed in the DEIS. In addition to these further analyses, the FEIS includes: a summary of probable adverse environmental impacts for all project elements; responses to public and agency comments on the Draft EIS; and a list of commitments and actions that City Light proposes to avoid, minimize, or otherwise mitigate potential environmental impacts.

DPD staff participated in the City of Seattle Interdepartmental Team established for the project in reviewing preliminary drafts of the Draft EIS, the Draft EIS, and the Final EIS, and considered the EIS to be adequate to understand probable project impacts and appropriate mitigation.

The adequacy of the EIS was appealed by two parties: Capitol Hill Housing and International Community Health Services. The appeals were consolidated by Deputy Hearing Examiner Anne Watanabe, with a hearing date of March 25, 2015. The Deputy Examiner issued a decision upholding the adequacy of the EIS on April 8, 2015.

The EIS and background materials are available on the web: <http://www.seattle.gov/light/dennysub/>.

RECOMMENDED DECISION – COUNCIL CONCEPT APPROVAL

DPD's recommendation is to **approve** the proposal and requested waivers. No conditions are recommended, as noted below.

RECOMMENDED CONDITIONS – TYPE V COUNCIL LAND USE DECISION

None.

Signature: _____ Date: June 29th 2015

Colin R. Vasquez, Senior Land Use Planner
Department of Planning and Development

Attachment 1 EIS Distribution List (Excerpt from Final EIS)



Chapter 10: DISTRIBUTION LIST

The following parties have received the Final EIS by electronic link, compact disc or printed copy:

Federal Agencies

Bonneville Power Administration

Tribal Governments

Muckleshoot Indian Tribe	Suquamish Tribe
Duwamish Tribe	Snoqualmie Tribe
Tulalip Tribes	

Regional

Puget Sound Regional Council
Puget Sound Clean Air Agency
Sound Transit

Washington State

Department of Ecology SEPA Register	Department of Ecology Stormwater Program
Department of Transportation	Department of Archaeology and Historic Preservation

Local

King County Metro
King County Industrial Waste Program
Seattle Office of the Mayor
Seattle City Council
Seattle Department of Planning and Development
Seattle Department of Transportation
Seattle Department of Public Utilities
Seattle Department of Parks and Recreation
Seattle Department of Neighborhoods, Historic Preservation Program
Seattle Design Commission

Other

Puget Sound Energy
BNSF
Port of Seattle

