



**CITY OF SEATTLE**  
**ANALYSIS AND RECOMMENDATION OF THE DIRECTOR OF**  
**THE SEATTLE DEPARTMENT OF CONSTRUCTION AND INSPECTIONS**

**Record Number:** 3034063-LU  
**Council File Number:** 314499  
**Applicant:** Toby Ressler, Seattle Parks and Recreation  
**Address of Proposal:** 8401 8<sup>th</sup> Avenue South

**SUMMARY OF PROPOSAL**

Council Land Use Action to allow 4 athletic field light poles (70 ft. tall poles) and to grade 6,150 cu. yds. of material (6,150 cu. yds. cut, 6,150 cu. yds of fill) for landscaping and improvements to existing city park (South Park Community Center Renovation). Parking for an additional 14 vehicles proposed, 16 spaces to remain (for a total of 30 parking spaces). Determination of Non-Significance prepared by Seattle Parks and Recreation.<sup>1</sup>

The following approvals are required:

- I. **Council Land Use Action (SMC 23.76.064.B)** – to waive or modify applicable development standards for a city facility.
  
- II. **Substantive SEPA Review (SMC 25.05.660)** – to approve, condition or deny pursuant to SEPA substantive authority.
  - No mitigating conditions of approval are imposed.
  - Pursuant to SEPA substantive authority provided in SMC 25.05.660, the proposal has been conditioned to mitigate environmental impacts.

**SEPA DETERMINATION**

- Determination of Non-Significance (DNS)
  - Pursuant to SEPA substantive authority provided in SMC 25.05.660, the proposal has been conditioned to mitigate environmental impacts.
  - No mitigating conditions of approval are imposed.
- Determination of Significance (DS) – Environmental Impact Statement (EIS)
- Determination made under prior action
- Exempt

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<sup>1</sup> ORIGINAL PROJECT DESCRIPTION: Council Land Use Action to allow 5 athletic field light poles (4, 80 ft. and 1, 70 ft. pole) and to grade 6,150 cu. yds. of material (6,150 cu. yds. cut, 6,150 cu. yds of fill) for landscaping and improvements to existing city park (South Park Community Center Renovation). Parking for an additional 14 vehicles proposed, 16 spaces to remain (for a total of 30 parking spaces). Determination of Non-Significance prepared by Seattle Parks and Recreation.

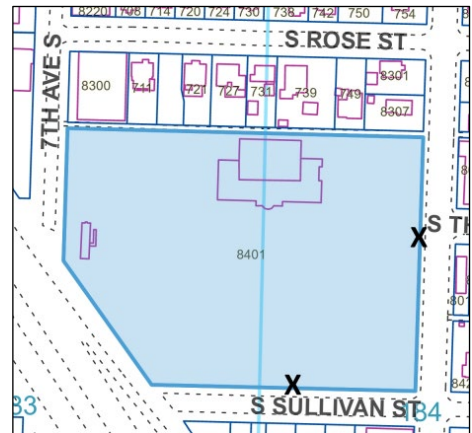
In accordance with SEPA (RCW 43.21C), a Determination of Non-Significance (DNS) was made under a prior action by Seattle Parks and Recreation (*South Park Community Center Sitewide Renovation*). The DNS was issued on September 12, 2019. An Addendum to the DNS was issued on April 7, 2021.

## BACKGROUND

*Environmentally Critical Area: Steep Slope Erosion Hazard Area:* The site contains a mapped steep slope erosion hazard area designation. Pursuant to the Environmentally critical areas ordinance, the site was granted relief from prohibition on steep slope development pursuant to SMC 25.09.090 (record number 6863809-EX, December 1, 2021):

*Environmentally Critical Areas (ECAs) geotechnical review for this project is required. Both topographic survey and geotechnical report are required for building permit application.*

*The project is described as "Seattle Parks and Recreation is renovating the existing South Park. Work includes replacing the grass field with a new synthetic turf field and updating the existing site features". Based on a review of the submitted information, the steep slope appears to qualify for relief criteria established in the Environmentally Critical Areas Code, SMC 25.09.090.B2b. Specifically, the steep slope appears to have been created by previous legal grading activities associated with street improvement and/or site development. For this reason, relief from prohibition of development in the steep slope area is approved and the required ECA Steep Slope Variance associated with the SDCI building application is waived. The approval of building permit application is conditioned upon a design that demonstrates that the proposed development will be completely stabilized in accordance with the geotechnical engineer's recommendations and provisions of the ECA Code and Grading Code. All other ECA Submittal and development standards still apply for this development.*



The top of this image is north. This map is for illustrative purposes only. In the event of omissions, errors or differences, the documents in SDCI's files will control.

## SITE AND VICINITY

*Site Description:* The subject site is located in the southwest portion of the city, adjacent State Route 99 at 8<sup>th</sup> Avenue South and South Sullivan Street. The site is relatively flat with some change in grade at the southwest corner adjacent to State Route 99. The public park currently includes a building (the South Park Community Center), playground, wading pool, soccer field, two baseball backstops/diamonds, and surface parking.

*Site Zone:* Residential, Neighborhood, Small Lot (RSL)

*Zoning Pattern:* (North) RSL  
(South) RSL  
(East) RSL  
(West) Industrial Buffer (IB U/45)

*Environmentally Critical Areas:* Steep Slope Erosion Hazard Area, Liquefaction Prone Soils, Former Landfill

## PROJECT PROPOSAL

The South Park city property is an existing public facility owned and operated by Seattle Parks and Recreation (SPR). The facility is a permitted use in the residential zone pursuant to SMC 23.44.036 (*Public Facilities*) and SMC 23.51A (*Public Facilities in Residential Zones*) and currently consists of a community center building, athletic fields, courts, playground, and surface parking lot. The scope of improvements to the facility include: a new artificial turf multi-purpose athletic field with dugouts and backstop fencing; four new 70-foot tall athletic field lights; a new multi-use court and renovation of a portion of the existing court into a pickleball court; a new parking lot; new dog off-leash area; new play equipment with play surfacing; new spray park with mechanical building; expanded walkways and plaza area, including a walking track around the athletic field; new pedestrian and parking area lighting; new landscaping, irrigation, and fencing; and new site furnishings such as picnic tables and grills.

The scope of the Council Land Use Action consists of a request to modify the development standard for maximum height in the zone. The maximum permitted height in this residential zone is 30-feet. The new athletic light poles exceed this height limit at 70-feet. The City Council may modify or waive development standards for a city facility pursuant to 23.76.064.

## PUBLIC COMMENT

The public comment period ended on August 31, 2022. Comments were received and carefully considered, to the extent that they raised issues within the scope of this review. These areas of public comment related to lighting, transportation, trees, and environmental health. Comments were also received that are beyond the scope of this review and analysis per SMC 25.05. Consistent with SMC 23.76.050, a response to public comments is provided in Section I below.

### **I. ANALYSIS – COUNCIL LAND USE ACTION**

Public parks are city facilities (or public facilities) that may be permitted in neighborhood residential zones, such as RSL, according to the provisions of Section 23.51A.002 and the provisions of Chapter 23.76, Subchapter III, Council Land Use Decisions (SMC 23.44.036 - Public facilities). Development standards for public facilities in neighborhood residential zones are found in SMC 23.44. Section 23.76.064 includes provisions for the City Council to grant concept approval and to waive or modify applicable development standards, accessory use requirements, special use requirements or conditional use criteria for City Facilities. SMC 23.76.004, 23.76.036.C, and 23.76.064 classifies this decision as a legislative action (Type V).

The South Park Community Center site is an existing city facility owned and operated by Seattle Parks and Recreation (SPR). The SPR Department requests to modify one development standard, as follows in Table A:

<b>Table A</b>		
<b>Development Standard</b>	<b>Code Requirement</b>	<b>Proposed Waiver or Modification</b>
SMC 23.44.012	The maximum height permitted for any structure	Allow four athletic field light poles to exceed the maximum 30-foot height

not located in a required yard is 30-feet.

limit. The new light poles are proposed to be 70-feet in height.

SMC 23.76.050 requires the Seattle Department of Construction and Inspections (SDCI) Director to prepare a written report on the Type V application, which includes the following analysis and information:

23.76.050 - Reports for Type IV and V Council land use decisions

A. *Except for Type V Council land use decisions that are proposed by the Director of the Office of Planning and Community Development, the Director shall prepare a written report on Type IV and V decisions and any associated Type II decisions listed in subsections 23.76.006.C.2.c, 23.76.006.C.2.d, 23.76.006.C.2.f, and 23.76.006.C.2.g and SEPA decisions integrated with such Type II decisions as set forth in subsection 23.76.006.C.2.i. For Type V Council land use decisions proposed by the Director of the Office of Planning and Community Development, the Director of the Office of Planning and Community Development shall prepare the report required under Section 23.76.050. For purposes of this Section 23.76.050 the word "Director" refers to the Director of the Seattle Department of Construction and Inspections or the Director of the Office of Planning and Community Development that is responsible for preparation of the report required by this section.*

This request to modify the height standards for four new athletic field light poles requires a Type V Council land use decision. This report serves as the SDCI Director’s Recommendation Report to City Council consistent with this criterion.

B. *The Director's report for Type IV and V Council land use decisions other than those listed in subsection 23.76.050.C shall include:*

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

Those City departments and other governmental agencies that provided written recommendations or comments include: King County Wastewater Treatment Division; and Seattle Public Utilities. Those recommendations and comments provided are related to code requirements and are summarized below.

DEPARTMENT/AGENCY	COMMENT
<b>King County Wastewater Treatment Division</b>	The King County Industrial Waste Program reviewed and approved the request to discharge construction wastewater to the sanitary sewer system. Discharge limitations, special conditions, monitoring requirements, and reporting requirements are outlined in the letter. (“Letter of Authorization 1195-01 to Discharge to the Sanitary Sewer,” October 11, 2022)

<b>Seattle Public Utilities</b>	Provided recommendations and comments related to water availability ( <i>Water Availability Certificate</i> , 23-00158 (February 17, 2023)).
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2. *Responses to written comments from the public;*

Public comments are summarized in italics, with responses following in normal typeface. All public comments are available online at the Seattle Services Portal ([Permits, Licenses and Regulatory Compliance - Seattle Services Portal | seattle.gov](https://seattle.gov/permits/licenses-and-regulatory-compliance)) by entering the project number or address.

*What steps are in place to mitigate light pollution from the new light poles, particularly for residents bordering the park. Please consider directionality, length and time of use and impact on neighbors?*

The configuration of the new athletic field lights allows for direction of the fixtures to safely cover the playfield while reducing potential for adverse spillover impacts on surrounding residences (*South Park Community Center Sitewide Renovation DNS*, August 27, 2019). LED floodlights that incorporate advanced internal/external shielding is proposed. The lights are “full cutoff” style lights that reduce the amount of direct light that is emitted into the air or directed off-site. The lighting system will operate from just prior to dusk until 11pm. (SEPA Checklist, August 26, 2019)

The parking light poles are 25-feet-tall with the LED fixture head mounted near the top. The fixture is full cut-off which directs all light downward and towards the parking surface. The fixtures have also been specified with a house side shield to prevent excess light behind the fixtures. Lumen output is minimal for these fixtures; therefore, glare will be at a minimum. Glare rating is 2 out of 5.

Section drawings of the proposed light poles are included in the MUP plan set.

*Requested two sport courts.*

The proposal includes a new multi-use court and the renovation of a portion of the existing court into a pickleball court. These courts are located in the northwest corner of the site and are labeled “basketball court” and “pickleball and basketball court” on the Overall Site Plan (sheet G1.0) in the MUP plan set.

*Transportation: Asked if Rose, Southern, and Elmgrove streets will be opened, if residents will be notified.*

The Seattle Department of Transportation (SDOT) confirmed that there are currently no plans to connect S Rose, S Southern, or S Elmgrove Streets to West Marginal Way South.

*Recommended S Kenyon Street be used as the primary access to 7<sup>th</sup> Avenue S and the parking lot.*

The surface parking area is proposed at the northwest corner of the site, along 7<sup>th</sup> Ave S. The previous location was at the northeast corner of the site, off 8<sup>th</sup> Ave S.

*Concerned about increased traffic.*

The SEPA DNS and Checklist note that limited changes to the operation of the park are proposed, and the total number of parking stalls is proposed to increase from 16 to 30. Seattle Parks and Recreation concluded that no significant adverse traffic impacts are anticipated and no mitigation is warranted pursuant to SMC 25.05.675. SDCI transportation experts reviewed the application materials and made the same conclusion: no additional mitigation is warranted.

*Concerned with safety at the proposed parking lot, citing lack of visibility and recommending additional lighting.*

Lighting is proposed in and adjacent to the surface parking area in the form of pedestrian scale lighting and 25-foot-tall parking area light poles. The lighting study submitted by Seattle Parks and Recreation demonstrates impacts from lighting proposed on-site. The parking lot lights will be on during normal business hours as coordinated by SPR.

*Recommended a walking/running track.*

A pedestrian path is proposed around the new multi-use athletic field with connections to S Sullivan Street, 8<sup>th</sup> Ave S, the community center building, and the surface parking lot. The pedestrian pathway around the new multi-use athletic field is a minimum 10-feet wide at all portions of the pathway.

*Recommended fencing, with gates, around the play area for safety.*

A three-foot tall chain link fence is proposed at the play area along 8<sup>th</sup> Ave S. Fencing materials and finishes will adhere to the Seattle Parks and Recreation Design Guidelines which include standards intended to maintain a harmonized and recognizable look to all City Parks.

*Recommended adequate ground space and features in the picnic area.*

Two paved picnic areas are proposed between the new multi-use athletic field and 8<sup>th</sup> Ave S. Elements included within these areas include elements such as pedestrian lighting, BBQs, wood benches with accessible seating, and trash cans (litter and recycling). These elements will adhere to the Seattle Parks and Recreation Design Guidelines which include standards intended to maintain a harmonized and recognizable look to all City Parks. The distance of this area from the pedestrian walkway to the property line appears to be approximately 50-feet in length, with an area of approximately 12,000-square feet.

*Requested that the comment period be extended.*

The public comment period was extended as requested and consistent with SMC 23.76.

*Asked if a fitness area will be included.*

A full-size gym is located in the existing community center building. The scope of the proposal includes elements that may be considered fitness areas, such as the athletic field, pedestrian path, courts, and play area. SPR confirmed that the scope of the improvements no longer include new fitness equipment as a potential donation did not occur.

*Supported the dog park area and recommended a second entrance/exit at the south end of the fenced area.*

One entrance is proposed at the north end of the off leash dog area that is completely enclosed by a four-foot tall chain link fence (MUP Plan Set Sheet G1.0)

*Recommended opening the existing gate at Sullivan Street and adding lighting.*

An existing gate at S Sullivan Street and 8<sup>th</sup> Ave S is proposed to remain at the existing height.

*Recommended security cameras.*

Cameras are not noted in the MUP plan set.

*Concerns with artificial turf.*

Seattle Parks and Recreation notes in their SEPA Checklist and DNS that they recognize and acknowledge common public opinion that there may be a correlation between exposures to certain elements of common synthetic turf systems and the development of serious illness. Styrene butadiene rubber (SBR) crumb rubber, manufactured from recycled tires, is a common infill in synthetic turf systems, and is known to contain compounds that are toxic when exposure occurs in a specific manner. The proposal does not include this SBR infill material.

*Asked about hours of operation.*

The hours of operation for the athletic field light poles are noted as just before dusk until 11PM.

*Supported retention of the existing poplar tree.*

Noted.

*Recommended retention of the pathway described as artistic and decorative that leads from 8<sup>th</sup> past the community center.*

Noted.

*Recommended bicycle racks near the play area or near the parking lot.*

Bicycle racks are proposed adjacent the community center building.

*Recommended additional trees to increase tree canopy and shade.*

A number of existing trees, generally lining the perimeter of the site are proposed for retention, including the existing Norway maple and 118-inch (diameter) Lombardy poplar tree which is located on the east edge of the site. New trees are also proposed to be planted on site and include fifty-five conifers and eleven deciduous trees. Twenty-four new trees are proposed specifically within the ECA area. All trees are shown on the landscape plan in the MUP plan set.

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

The neighborhood residential code, Chapter 23.44, contains development standards for uses in the neighborhood residential zones, including RSL zones. Examples of those development standards include: lot coverage, height limits, yards, and tree requirements. The proposal complies with the applicable development standards of the zone, save for one: maximum height limits per SMC 23.44.012. The maximum permitted height of the zone is 30-feet. The proposed new athletic field light poles are proposed at 70-feet in height, 40-feet taller than the maximum permitted in the zone. Lighting at this existing park is a new component to the site. The goal of the lights is to illuminate the playing surfaces and eliminate spillover light and/or glare which could negatively affect surrounding residents. The lighting proposed includes high efficiency LED floodlights with extensive shielding specifically designed to reduce light and glare impacts, while the siting and configuration of the lighting allows for arranging the fixtures to safely cover the playfield while reducing the potential for adverse spillover impacts on surrounding properties. It is anticipated the new lighting will allow for expanded use of the park and athletic fields throughout the winter season and with expanded usage into the evening hours. The redevelopment of the South Park Community Center Park, including new athletic field lighting, will upgrade the facilities to align with current ballfield standards and create extended recreational opportunities. (*South Park Community Center SEPA DNS*, September 2019; and *SEPA Checklist*, August 2019). The proposed four new 70-foot-tall athletic light poles is a modification from the original proposal which included five new light poles at heights of 70 and 80-feet. The City Council may modify or waive this height limit standard pursuant to a Council Land Use Decision (SMC 23.76).

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

The following environmental documentation were submitted by Seattle Parks and Recreation:

- *South Park Community Center Sitewide Renovation DNS* (Seattle Parks and Recreation, September 12, 2019);
- *Addendum to DNS (SPR, April 17, 2021)*;
- *SEPA Checklist* (August 26, 2019);
- *Lighting Study* (Musco Lighting, March 14, 2019);
- *Geotechnical Report South Park Community Center Site-Wide Redevelopment* (Aspect Consulting, June 11, 2021);
- *Tree Inventory and Inspection at South Park Playground* (Matt Stemple Seattle Parks OOC Arboriculturist, ISA, January 31, 2019);



- *South Park Community Center Open Space Design Plan: Rapid Health Impact Assessment (HIA) Findings & Recommendations* (King County Public Health, October 13, 2016);
- *SEPA Greenhouse Gas Emissions Worksheet* (July 17, 2022);
- *Mitigation Sequencing Plan* (Melanie Davies, MIG, October 7, 2022);
- *Water Availability Certificate (WAC) #20190154*, Seattle Public Utilities, January 22, 2019;
- *Water Availability Certificate (WAC) #2300158*, Seattle Public Utilities, February 17, 2023.

5. *The Director's recommendation to approve, approve with conditions, or deny a proposal.*

The SDCI Director recommends approval of the proposal with no conditions.

## **RECOMMENDATION – COUNCIL LAND USE DECISION**

SDCI recommends APPROVAL of the request to modify or waive the development standard for height for a City Facility as shown in the MUP plan set for 3034063-LU.

## **II. ANALYSIS – SEPA**

### **PROCEDURAL SEPA**

Significant impacts of this proposal were analyzed in the DNS for *South Park Community Center Sitewide Renovation* (Seattle Parks and Recreation (SPR), September 12, 2019) and Addendum to the DNS (SPR, April 7, 2021). The SEPA Ordinance contemplates that the general welfare, social, and other requirements, and essential considerations of State policy will be taken into account in weighing and balancing project alternatives and in making final decisions. The following specific environmental policies listed in SMC 25.05.675 were studied in the DNS: recreation, construction traffic, construction noise, light and glare, environmental health, traffic and parking, and plants and animals.

### **SUBSTANTIVE SEPA**

An environmental checklist is used by agency decision makers to analyze environmental impacts, along with other relevant considerations or documents, in making final decisions on a proposal. The Seattle SEPA Code (SMC 25.05) contemplates that the general welfare, social, and other requirements, and essential considerations of state policy will be taken into account in weighing and balancing project alternatives and in making final decisions. The environmental checklist provides a basis upon which agency officials can make the balancing judgment mandated by SEPA, because it provides information on the environmental costs and impacts.

The Seattle SEPA Code provides substantive authority to require mitigation of adverse environmental impacts resulting from a proposal (SMC 25.05.655 and 25.05.660). Mitigation, when required, must be related to specific environmental impacts identified in an environmental document and may only be imposed to the extent that a given impact is attributable to a proposal, and to the extent that the

mitigation is reasonable and capable of being accomplished. Additionally, mitigation may be imposed only when based on policies, plans, and regulations referenced in SMC 25.05.665 to SMC 25.05.675 (SEPA Overview Policy, SEPA Cumulative Impacts Policy, and SEPA Specific Environmental Policies). In some instances, local, state, or federal regulatory requirements will provide sufficient mitigation of an impact and additional mitigation imposed through SEPA may not be necessary.

The DNS for *South Park Community Center Sitewide Renovation* identified short and long term impacts such as recreation, construction traffic, noise, light and glare, and environmental health. No mitigation measures were conditioned. The City of Seattle Department of Construction and Inspections is conducting substantive SEPA review of the proposal to determine whether mitigation is warranted by the City's SEPA policies found in SMC 25.05.665-675.

The SEPA Overview Policy (SMC 25.05.665) clarifies the relationship between codes, policies, and environmental review. Specific policies for each element of the environment, and 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 such limitations/circumstances, mitigation can be considered; thus, a more detailed discussion of some of the impacts is appropriate.

#### SHORT TERM IMPACTS

Construction activities could result in the following adverse impacts: construction dust and storm water runoff, erosion, emissions from construction machinery and vehicles, increased particulate levels, increased noise levels, occasional disruption of adjacent vehicular and pedestrian traffic, and increases in greenhouse gas emissions. Several construction-related impacts are mitigated by existing City codes and ordinances applicable to the project such as: the Stormwater Code (SMC 22.800-808), the Grading Code (SMC 22.170), the Street Use Ordinance (SMC Title 15), the Seattle Building Code, and the Noise Control Ordinance (SMC 25.08). Puget Sound Clean Air Agency regulations require control of fugitive dust to protect air quality. Short term impacts, as well as mitigation, are identified in the environmental checklist annotated by SDCI with additional analysis provided below.

#### *Air Quality – Greenhouse Gas Emissions*

Construction activities including construction worker commutes, truck trips, the operation of construction equipment and machinery, and the manufacture of the construction materials themselves result in increases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming. While these impacts are adverse, no further mitigation is warranted pursuant to SMC 25.05.675.A (Air Quality Policy).

#### *Construction Impacts –Transportation*

Increased trip generation is expected during the proposed demolition, grading, and construction activity. The area is subject to significant traffic congestion during peak travel times on nearby arterials. Large trucks turning onto arterial streets would be expected to further exacerbate the flow of traffic. The DNS and SEPA checklist notes that there is adequate area on-site for construction crews, equipment, and materials.

The amount of excavation and size of construction will result in a small and temporary increase in truck trips. Any closures of the public right of way will require review and permitting by Seattle Department of Transportation (SDOT). Additional mitigation is not warranted pursuant to SMC 25.05.675.B (Construction Impacts Policy).

#### Construction Impacts – Noise

The project is expected to generate loud noise during demolition, grading, and construction. The Seattle Noise Ordinance (SMC 25.08.425) permits increases in permissible sound levels associated with private development construction and equipment between the hours of 7:00 a.m. and 10:00 p.m. on weekdays and between the hours of 9:00 a.m. and 10:00 p.m. on weekends and legal holidays.

If extended construction hours are necessary due to emergency reasons or construction in the right of way, the applicant may seek approval from SDCI through a Noise Variance request. The applicant's environmental checklist does not indicate that extended hours are anticipated.

The limitations stipulated in the Noise Ordinance are sufficient to mitigate noise impacts and no additional SEPA conditioning is necessary to mitigate noise impacts pursuant to SMC 25.05.675.B (Construction Impacts Policy).

#### Construction Impacts – Mud and Dust

Approximately 6,150 cubic yards of material will be excavated and removed from the site. Transported soil is susceptible to being dropped, spilled, or leaked onto City streets. The City's Traffic Code (SMC 11.74.150 and 160) provides that material hauled in trucks not be spilled during transport. The City requires that loads be either: 1) secured/covered; or 2) a minimum of six inches of "freeboard" (area from level of material to the top of the truck container). The regulation is intended to minimize the amount of spilled material and dust from the truck bed enroute to or from a site.

No further conditioning of the impacts associated with these construction impacts of the project is warranted pursuant to SMC 25.05.675.B (Construction Impacts Policy).

#### Earth

The Environmentally Critical Areas (ECA) Ordinance and Director's Rule (DR) 5-2016 require submission of a soils report to evaluate the site conditions and provide recommendations for safe construction in landslide prone areas. Pursuant to this requirement, the applicant submitted a geotechnical engineering study (*Geotechnical Report South Park Community Center Site-Wide Redevelopment* (Aspect Consulting, June 11, 2021)). The study has been reviewed by SDCI's geotechnical experts, who will require what is needed for the proposed work to proceed without undue risk to the property or to adjacent properties. Additionally, pursuant to the ECA Ordinance (SMC 25.09.065), a mitigation sequencing plan was submitted demonstrating how the ecological functions of the ECA steep slope erosion hazard area will be protected or restored. Mitigation monitoring details are included in the MUP plan set. The existing Grading and Stormwater Codes and ECA Ordinance will sufficiently mitigate adverse impacts to the environmentally critical areas. No additional conditioning is warranted pursuant to SMC 25.05.675.D (Earth Policy).

## LONG TERM IMPACTS

Long term or use-related impacts are also anticipated as a result of approval of this proposal. Compliance with applicable codes and ordinances is adequate to achieve sufficient mitigation of most long-term impacts and no further conditioning is warranted by SEPA policies. Long term impacts, as well as mitigation, are identified in the environmental checklist annotated by SDCI with additional analysis provided below.

### *Air Quality – Greenhouse Gas Emissions*

Operational activities, primarily vehicular trips associated with the project's energy consumption, are expected to result in increases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming. While these impacts are adverse, no further mitigation is warranted pursuant to SMC 25.05.675.A (Air Quality Policy).

### *Light and Glare*

Development projects sometimes include lighting and/or reflective surface materials which can adversely affect motorists, pedestrians, and the surrounding area. Such adverse impacts may be mitigated by alternative lighting techniques and surface materials. It is the City's policy to minimize or prevent hazards and other adverse impacts created by light and glare.

The DNS and SEPA checklist note the goal of the proposed athletic field light poles is to illuminate the playing surfaces while eliminating spillover light and/or glare which could negatively affect surrounding residents. The Lighting Study (Musco Lighting, March 14, 2019) includes details such as luminaire type, wattage, lumens, and pole height. As shown in the lighting study, the proposed lights are designed to provide maximum useful on-field illumination with minimal off-site glare. Glare less than 25,000 candela (equivalent to high beam headlights of a car) are anticipated on adjacent properties. No additional SEPA conditioning is necessary to mitigate light and glare impacts pursuant to SMC 25.09.675.K (Light and Glare Policy).

### *Noise*

Noise may be injurious to the public health, safety, and welfare. It may have adverse impacts on commerce; the use, value and enjoyment of property; sleep and repose; and the physiological and psychological well-being of those who live and work in Seattle. It is the City's policy to minimize or prevent adverse noise impacts resulting from new development or uses.

With the introduction of athletic field lights, it is anticipated the hours of use of the park may increase which may result in an increase in the hours of noise from use of the park. The limitations stipulated in the Noise Ordinance (SMC 25.08) and Land Use Code (SMC Chapter 23) are sufficient to mitigate noise impacts and no additional SEPA conditioning is necessary to mitigate noise impacts pursuant to SMC 25.05.675.L. (Noise Policy).

### *Plants and Animals*

Mature vegetation is located on the site, including several trees and exceptional Lombardy poplar tree. The applicant submitted an arborist report (*Tree Inventory and Inspection at South Park Playground*, Jay Rood, Seattle Parks and Recreation, January 31, 2019) and identified the exceptional tree on the MUP

plan set, including tree protection fencing and details consistent with the Tree Protection Ordinance (SMC 25.11). SDCI's arborist has reviewed this information and determined that no mitigation is warranted per SMC 25.05.675.N (Plants and Animals Policy).

Traffic and Transportation

The DNS and SEPA checklist indicated that the project is expected to generate a slight increase in the total number of daily vehicle trips given an expected increase in the number of hours of usability of the outdoor athletic fields with the new athletic field light poles.

The additional trips are expected to distribute on various roadways near the project site and would have minimal impact on levels of service at nearby intersections and on the overall transportation system. The SDCI Transportation Planner reviewed the information and determined that no mitigation is warranted per SMC 25.05.675.R (Traffic and Transportation Policy).

**DECISION – SEPA**

The environmental checklist, technical reports, application materials, MUP plans and responses to requests for information all comprise Seattle Department of Construction and Inspection's (SDCI) record. Pursuant to SMC 25.05.600.D.1, SDCI relies on the environmental determination, documents and technical reports prepared by Seattle Parks and Recreation in their role as lead agency.

The proposed action is APPROVED.

**RECOMMENDED CONDITION(S) – SEPA**

None.

**RECOMMENDED CONDITION(S) – COUNCIL LAND USE ACTION**

None.

Carly Guillory, Land Use Planner  
Seattle Department of Construction and Inspections

Date: May 22, 2023

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