



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

**Record Number:** 3039491-LU

**Council File Number:** CF #314536

**Applicant:** Shannon Glass for Seattle Parks and Recreation

**Address of Proposal:** 4100 Beacon Ave S

**SUMMARY OF PROPOSAL**

Council Land Use Action to allow installation of 32 netting poles. Project includes footings and netting for new poles (ranging at 20 feet to 160 feet) at Jefferson Park Golf Course.

The following approvals are required:

- I. **Council Land Use Action (SMC Chapter 23.76.064)** – to exceed the height in NR3 zone.
- II. **Special Exception (SMC Chapter 23.64)** – to exceed the height limit for Airport Height Overlay District.

**SEPA DETERMINATION**

- ☐ Determination of Nonsignificance (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

In accordance with SEPA (RCW 43.21C), a SEPA Exemption was made under a prior action by Seattle Parks and Recreation (David Graves, August 12, 2019).

**BACKGROUND**

Additional proposal summary according to information in the project file:

*“Jefferson Park Golf Course is owned by Seattle Parks and Recreation (SPR) and occupies approximately 123 acres on the top of Beacon Hill. The golf course consists of an 18-hole regulation length golf course, 9-hole par 3 course, driving range, practice green, clubhouse with adjoining café, and support facilities. Jefferson Park Golf Course is Seattle’s oldest municipal golf course. The area occupied by the golf course and adjacent park was part of the original Seattle park master plan developed by the Olmsted brothers in 1903 and the location of the golf course*

and the park roadway on the west side were built as planned. Other features of the master plan west of Beacon Avenue were not implemented.

Jefferson Park Golf Course holes 11 and 12 are located in the northeast corner of the site, adjacent to residential dwellings. There have been issues with golf balls leaving the site and landing in surrounding roads and private property. There are identified Environmentally Critical Areas (ECAs) across and adjacent to the golf course, as shown on the Seattle Department of Construction and Inspections' GIS database. The area along the north and east edge of the golf course where the netting poles will be installed contains Steep Slope ECAs and there is a Known Slide Area ECA on the adjacent property to the east, both associated with the east facing slope of Beacon Hill.

Seattle Parks and Recreation (SPR) is proposing to install netting along holes 11 and 12 at Jefferson Park Golf Course to reduce golf balls traveling out of the golf course. The proposed work includes:

- *Hole 11 – Install 16 poles ranging in height from 20' to 160' with netting in between the poles. This netting would be along the east side of the golf hole from the tee to about 200 yards out. All work would be on the golf course and require removal and/or relocation of 10 trees. Work involves installing footings for the poles, new poles and netting between these poles.*
- *Hole 12 – Install 16 poles ranging in height from 40' to 157' with netting in between the poles. This netting would be along the north side of the golf hole from the tee to about 250 yards out. All work would be on the golf course and require removal and/or relocation of 10 trees. Work involves installing footings for the poles, new poles and netting between these poles.*

*The work will include clearing the vegetation in the area where the netting and poles are proposed, drilling holes and pouring concrete for the pole foundations, installing the poles and installing the netting. There will be no change in grades and no change to stormwater facilities. No areas of native vegetation will be disturbed; lawn areas that are damaged during construction/installation will be repaired and restored. To the extent that trees need to be removed, new trees will be replanted at the required ratio of two new trees for every one tree removed."*

Pursuant to SMC 25.09.045 Exemptions, Seattle Parks and Recreation (David Graves, August 12, 2019), determined the proposal is unlikely to result in substantial disturbance of the underlying Steep Slope and Known Slide Area ECA's;

*"As the proposed netting and pole improvements are maintenance and remodeling of an existing recreation facility involving no material expansions or changes in use beyond that previously existing, they are **exempt** from environmental review under SEPA. Furthermore, as the proposal is routine maintenance/remodeling of an existing public facility and will not substantially disturb the underlying designated Steep Slope and Known Slide Area ECAs, the proposal is **exempt** from the provisions of SMC Ch. 25.09, Regulations for Environmentally Critical Areas."*

## SITE AND VICINITY

*Site Description:* The project site is located in the Beacon Hill neighborhood of Seattle and is currently developed with the 18-hole Jefferson Park Golf Course, a nine-hole course, a driving range, a clubhouse, a cart barn and accessory parking. The site is bounded by S. Spokane St, 24<sup>th</sup> Ave S, Cheasty Blvd, and Beacon Ave S.

*Site Zone:* Neighborhood Residential 3 (NR3)

*Zoning Pattern:* (North) Neighborhood Residential 3 (NR3)  
(South) Neighborhood Residential 3 (NR3)  
(East) Neighborhood Residential 3 (NR3)  
(West) Neighborhood Residential 3 (NR3), MIO-240-MR (M), MIO-105-LR3 (M), MIO-37-LR2 (M)

*Environmentally Critical Areas:* There are ECA Liquefaction Prone Areas, Steep Slope, Wetlands, and Wildlife Habitat Areas mapped on site.

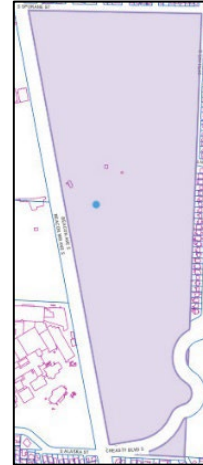
## PUBLIC COMMENT

The public comment period ended on April 14, 2025. 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 cultural and archeological resources, property damage, maintenance, wildlife impact, height impacts, stormwater impacts, tree removal, and view blockage.

Seattle Parks and Recreation summarizes the public comments they received as follows:

*“Seventy-nine public comments were submitted for this project. Sixty-four comments support the project, eleven comments oppose the project, and three comments were neutral.*

- *Comments in support of the project noted the value of restoring holes 11 and 12 to their original design and full course length, which will improve the recreational value and quality of play. Comments noted the historical significance of the Olmsted-designed course, the importance of equitable investment in underserved south Seattle, and safety benefits for adjacent properties. There were also comments describing how shortening the length of holes 11 and 12 in response to neighbor complaints about errant balls has diminished the overall playing experience at the golf course. SPR’s response:*
  - o *The project will restore holes 11 and 12 to their original configuration and provide public safety and protection of private property.*
- *Comments opposing the project described concerns that the pole and netting will remove trees, create an environmental or wildlife hazard, obstruct access and visibility into the course, be an eyesore, decrease nearby home values, diminish the quality of the neighborhood, and set a precedent for allowing future development that exceeds allowable heights. There were also comments about failure to explore alternatives to netting, lack of environmental study, lack of*



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.

*public outreach, inadequate trajectory studies, stormwater issues in the adjacent right of way, and poor golf course maintenance. SPR's response:*

- o The project will impact one tree on Hole 11. Three trees will be planted within Jefferson Park in compliance with the City of Seattle tree replacement requirements.*
- o SPR Golf Operations staff and Premiere Golf Centers report that there have been no impacts to wildlife related to pole and netting systems in Seattle municipal golf courses. Also see attached "Netting Report to Address Potential Bird Strikes" (Tanner Consulting Group, April 29, 2025) which attests to the widespread use of sports netting and minimal risk to bird strikes or entanglement.*
- o Access to and within the course will be unchanged by the project.*
- o The transparent netting fabric will have minimal visual impact. The netting will be installed along the edge of the fairways. Trees that have been planted along the property line will buffer the visual impact of the poles and netting.*
- o The purpose of the project is to address errant golf balls travelling outside the golf course, which provides public safety and protection of private property.*
- o SPR's 2019 Strategic Business Plan for the Future of City of Seattle Owned Municipal Golf Courses (<https://www.seattle.gov/parks/about-us/plans-and-reports/recreation-plans-and-reports/municipal-golf-course-study>) identified the errant ball issue holes 11 to 12 at Jefferson Park Golf Course. SPR and Premier Golf Centers worked on a plan to reroute holes from a counterclockwise pattern to a clockwise pattern. As the design was developed, it was determined that permitting requirements, tree loss, extensive course closure for construction, lost revenue, and overall project costs outweighed the option of installing netting.*
- o SPR issued a SEPA Determination of Non-Significance (DNS) for this project. See attached.*
- o SPR held two public meetings for this project on September 10, 2020 and January 28, 2023.*
- o Tanner Consulting Group prepared a ball trajectory study for Holes 11 and 12 in 2018, which was updated in 2024 in coordination with SPR and the engineering consultants to ensure minimal tree loss. The analysis considers golf ball flight trajectory for different golfer skill levels, and environmental factors such as wind speed and elevation changes. See attached Ball Trajectory / Netting Plan, Tanner Consulting (June 5, 2024)*
- o The project limits are on SPR property. There is no scope of work in the adjacent rights of way. The project will be constructed in compliance with current stormwater code requirements.*
- o The pole and netting system is engineered for strength and longevity, and will be constructed of weather-resistant materials, including engineered steel poles and secure fittings."*

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

Public parks are City facilities permitted outright in Neighborhood Residential zones. Development standards for neighborhood residential zones are found in Seattle Municipal Code (SMC) Chapter 23.44. SMC 23.76.064 includes provisions for the City Council to waive or modify applicable development standards, accessory use requirements, special use requirements or conditional use criteria for City facilities. Seattle Parks and Recreation seeks a Council Approval under SMC 23.76.064 to modify height development standards to allow the height of netting and poles for holes 11 and 12 to exceed the height limit by 130 feet.

SMC 23.76.050 requires the Director to prepare a written report on Type V application, which includes the following analysis and information:

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

**Seattle Parks and Recreation** - As the proposed netting and pole improvements are maintenance and remodeling of an existing recreation facility involving no material expansions or changes in use beyond that previously existing, it is determined that this project is exempt from environmental review under SEPA. Furthermore, as the proposal is routine maintenance/remodeling of an existing public facility and will not substantially disturb the underlying designated Steep Slope and Known Slide Area ECAs, the proposal is exempt from the provisions of SMC Ch. 25.09, Regulations for Environmentally Critical Areas. (David Graves, August 12, 2019).

**Federal Aviation Administration** - The Parks Department obtained a Determination of No Hazard to Air Navigation (FAA, Aeronical Study No. 2021-ANM-10008-OE, January 17, 2023) for 32 structures described as "Pole Golf course netting" for the subject site. As a condition to this Determination, the FAA requires that *"the structure is to be marked/lighted in accordance with FAA Advisory circular 70/7460-1 M, Obstruction Marking and Lighting, red lights-Chapters 4,5(Red),&15."*

**2. *Responses to written comments submitted by interested citizens;***

Please see the discussion under 'Public Comments' above. 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 (3039491-LU).

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

Seattle Municipal Code (SMC) Chapter 23.44 includes standards and criteria for proposed development in Neighborhood Residential zones. Public parks are a permitted use in Neighborhood Residential zones. The project meets all applicable development standards for Neighborhood Residential zones with the exception of the allowable height limit. The requested development standard modification is discussed below:

a. Explanation for why the netting and poles are required,

The proposal includes netting and netting poles up to 160 feet (130 feet higher than the code allows. According to information submitted by Seattle Parks and Recreation:

*"...Course changes due to the removal of trees at Jefferson Park has resulted in downgrading the course for tournament play because the length of two holes had to be reduced in order to reduce ball trespass issues into neighboring homes. The course now plays to a par of 69. Due to the removal of perimeter protective trees on holes 7, 11 and 12, hole 11 was changed from a 463 yard par 4 to about a 150 yard par 3. The 12th hole was changed from a 197 yard par 3 to a very short, about 90 yard par 3."*

These changes, intended to be temporary, have resulted in declined rounds of play and reduced revenues for the golf course. When the pole and netting system are installed, the holes will be restored to their original playing configurations and full course play.

b. Ball Flight Study summary,

To support the requested increase in netting and pole height, Seattle Parks and Recreation submitted a Ball Trajectory Study for Holes 11 and 12 (*Tanner Consulting Group, 2024*). The analysis considers golf ball flight trajectory for different golfer skill levels, and environmental factors such as wind speed and elevation changes.

c. How the netting and pole design limits the impact of the height in the NR zone and its relationship to the comprehensive plan/policies.

According to information submitted by Seattle Parks and Recreation:

*“The pole heights range from 20 feet to 160 feet tall. The netting fabric is transparent and will result in minimal visual impact. The netting will be installed in SPR property, along the edge of the fairway. The poles are setback approximately 40 feet from the S Spokane St curb at hole 12, and approximately 40 feet from the 24th Ave S curb at hole 11. Trees that have been planted along the property line will buffer the visual impact of the poles and netting.”*

The Land Use Code has been developed in accordance with Comprehensive Plan policies. Regarding height limits in Neighborhood Residential zones, the Comprehensive Plan policy LU70 requires, “Establish height limitations in single-family residential areas that establish predictable maximum heights, maintain a consistent height limit throughout the building envelope, maintain the scale relationship between a structure and its site, address varying topographic conditions, control view blockage and encourage pitched roofs.”

The height limitation of 30 feet is appropriate for most structures in Neighborhood Residential zones and is most consistent with the Comprehensive Plan when applied to residential or institutional structures typically found in Neighborhood Residential zones and the pattern of development resulting from relatively small lots. However, the height limit of 30 feet does not address the site-specific requirements necessary for the Parks Department to address public safety and playability concerns at the Jefferson Golf Course.

Seattle Parks and Recreation has also indicated that the taller net poles and nets will be made of the most transparent material available for the purpose. The use of the most transparent material available serves to mitigate the effect of the taller poles and netting so that the proposal is not inconsistent with the applicable Comprehensive Plan policies.

SDCI recommends approval of this requested modification to development standards to allow nets and net poles of up to 160 feet in height.

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

Seattle Parks and Recreation submitted a SEPA/ECA Exemption memo, dated August 12, 2019, by David Graves. Seattle Parks and Recreation also submitted a Ball Trajectory Study for holes 11 and 12, which is referenced above, and are attached as Attachments A and B of this report.

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

Based on the analysis provided above, SDCI recommends the following:

SDCI recommends **approval with conditions** of the requested modifications to the development standards to allow for nets and net poles of up to 160 feet in height, subject to the requirement that the structure is to be marked/lighted in accordance with FAA Advisory circular 70/7460-1 M, Obstruction Marking and Lighting, red lights-Chapters 4,5(Red), &15. This note is to be added to the Building Permit drawing set prior to issuance.

**II. ANALYSIS – SPECIAL EXCEPTION FOR AIRPORT HEIGHT OVERLAY DISTRICT**

The Director may permit a structure to exceed the limits of the Airport Height Overlay District as a special exception pursuant to Chapter 23.76, Procedures for Master Use Permits and Council Land Use Decisions. Because the Special Exception is part of a Council Land Use Decision, SDCI is making a recommendation to Council. A Special Exception shall only be permitted if the Director finds that all of the following conditions exist:

**A. *The Federal Aviation Administration advises the Director that the exception to the height limits does not create a hazard to aviation.***

The Federal Aviation Administration provided a Determination of No Hazard to Air Navigation for all the proposed driving range poles and nets on January 17, 2023. The FAA referenced Aeronautical Study numbers 2021-ANM-1008-OE. The proposal meets this criterion.

**B. *The additional height is necessary for the successful physical function of the structure.***

Seattle Parks and Recreation has demonstrated that the additional height is necessary for the successful function of the driving range to reduce the occurrence of golf ball “trespass” (i.e., ball flight exceeding the net height). The proposal meets this criterion.

**C. *The exception will not result in re-routing of aircraft.***

The FAA Determination of No Hazard to Air Navigation notes that the proposal would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft. The proposal meets this criterion.

**D. *The structure is designed to minimize adverse impacts of lighting on surrounding uses while complying with the lighting requirements of the Federal Aviation Administration.***

The FAA Determination of No Hazard to Air Navigation includes the requirement that “*the structure is to be marked/lighted in accordance with FAA Advisory circular 70/7460-1 M, Obstruction Marking and Lighting, red lights-Chapters 4,5(Red),&15.*” The required lighting over the height limit is minimal and will have no adverse impacts on the surrounding uses. The proposal, with this lighting requirement, meets this criterion.

### **RECOMMENDATION – COUNCIL LAND USE ACTION & SPECIAL EXCEPTION**

This COUNCIL LAND USE ACTION application is RECOMMENDED FOR APPROVAL subject to the condition listed at the end of this decision.

### **RECOMMENDED CONDITIONS – COUNCIL LAND USE ACTION**

#### **Prior to Issuance of Construction Permit**

1. The structure is to be marked/lighted in accordance with FAA Advisory circular 70/7460-1 M, Obstruction Marking and Lighting, red lights-Chapters 4,5(Red),&15.

David Sachs, Senior Land Use Planner  
Seattle Department of Construction and Inspections

Date: July 31, 2025

3039491-LU Recommendation CA SE SEPA