

Draft Environmental Impact Statement

Prepared for

Fort Lawton Army Reserve Center Redevelopment Project

Prepared by the City of Seattle



December 14, 2017



December 14, 2017

Dear Affected Agencies, Tribes, Organizations and Interested Parties:

Enclosed is the Draft Environmental Impact Statement (DEIS) for the proposed *Fort Lawton Army Reserve Center Redevelopment Project*. This DEIS analyzes the probable adverse environmental impacts associated with three development alternatives and the No Action Alternative.

The public comment period associated with this DEIS is:

December 14, 2017 through January 29, 2018

Agencies, affected tribes, organizations and members of the public are invited to comment on the DEIS. Methods for presenting your comments are described below. All comments are due no later than January 29, 2018 and may be submitted:

Via email to: OH_Comments@seattle.gov

In writing to: Lindsay Masters, Office of Housing, PO Box 94725, Seattle, WA 98124-4725

In writing and/or verbally at the DEIS public hearing:

- **Meeting Location:** Magnolia United Church of Christ, 3555 W McGraw St., Seattle, WA 98199
- **Meeting Date/Time:** January 9, 2018, at 6 PM

Following the DEIS comment period, the Seattle Office of Housing will prepare a Final EIS (FEIS) that addresses comments received during the DEIS public comment period.

Copies of this DEIS have been distributed to agencies noted on the Distribution List of this DEIS (**Appendix A**). The DEIS can be reviewed at the Seattle Office of Housing (Seattle Municipal Tower, 700 5th Ave., Suite 5700), and online at www.seattle.gov/housing/ft-lawton. CDs of the DEIS are available from the Seattle Office of Housing for the cost of reproduction.

Thank you for your interest in the *Fort Lawton Army Reserve Center Redevelopment Project* DEIS.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Walker".

Steve Walker, Director of Office of Housing

DRAFT ENVIRONMENTAL IMPACT STATEMENT

for the

Fort Lawton Army Reserve Center Redevelopment Project

City of Seattle

The Draft EIS (DEIS) for the *Fort Lawton Army Reserve Center Redevelopment Project* has been prepared in compliance with the State Environmental Policy Act of 1971 (Chapter 43.21C, Revised Code of Washington) and the SEPA Rules, effective April 4, 1984, as amended (Chapter 197-11, Washington Administrative Code). Preparation of this DEIS is the responsibility of the City of Seattle. The City of Seattle has determined that this document has been prepared in a responsible manner using appropriate methods and has directed the areas of research and analysis that were undertaken in preparation of this DEIS. This document is not an authorization for an action, nor does it constitute a decision or a recommendation for an action; in its final form, it will accompany the *Proposed Actions* and will be considered in making the final decisions on the proposal.

Date of DEIS Issuance..... December 14, 2017

Date Comments are due on the DSEISJanuary 29, 2018

FACT SHEET

Name of Project

Fort Lawton Army Reserve Center
Redevelopment Project (Fort Lawton Project)

Applicant

City of Seattle Office of Housing (Office of Housing)

Location

The approximately 34-acre Fort Lawton site is located in the Magnolia neighborhood in northwest Seattle. The site is bordered by W Lawton Street to the north, 36th Avenue W to the east, W Government Way to the south and Discovery Park to the west.

Prior Environmental Review

NEPA environmental review was accomplished by the Army for prior actions related to the Fort Lawton Project. The *Final EA for BRAC 05 Recommendations for Closure, Disposal and Reuse of Fort Lawton, United States Army Reserve Center (FACID, WA030, WA031, WA012), Seattle, WA* (July 2012) is incorporated by reference into this EIS, per WAC 197-11-635.

EIS Required

Office of Housing, as SEPA lead agency, determined that the Fort Lawton Project is likely to have a significant impact on the environment. Thus, an EIS is required, per RCW 43.21C.030(2)(c).

Proposed Actions

- City Council approval of the updated redevelopment plan;
- City Council approval of a legislative rezone of portions of the Fort Lawton site from SF 7200 to a lowrise zoning classification;
- Council authorization of public property conveyances from the Army to the City of Seattle, including acquisition and subsequent sale of parcels designated for housing development and execution of necessary easement agreements;
- Preliminary and final plat approvals;
- City Council approval of funding for acquisition and development; and
- Land use, building and construction permit approvals.

EIS Alternatives

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Preferred Alternative):

Development of a mix of affordable housing onsite, including homeless and affordable rental and ownership housing, with a portion of the site likely rezoned to lowrise residential zoning. Public park uses would also be created, including active park facilities, preserved existing natural areas and conversion of an existing structure to a park maintenance facility;

Alternative 2 – Market-Rate Housing Onsite; Affordable and Homeless Housing Offsite: Development of market-rate single-family housing under current zoning onsite, and construction of homeless and affordable housing at the Talaris site;

Alternative 3 – Public Park Onsite; Affordable and Homeless Housing Offsite: Development of the entire site as a public park, and construction of homeless and affordable housing at the Talaris site; and

Alternative 4 – No Action Alternative: No redevelopment of the site at this time; existing structures onsite would be maintained.

Lead Agency SEPA Responsible Official

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Seattle, WA 98124-4725

EIS Contact Person

Lindsay Masters, Project Manager
Seattle Office of Housing
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Seattle, WA 98124-4725

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Email: Lindsay.masters@seattle.gov

Required Approvals and/or Permits

Preliminary analysis indicates that the following approvals and/or permits may be required from agencies with jurisdiction¹ for Alternative 1, 2 and 3.

¹ An agency with jurisdiction is “an agency with authority to approve, veto or finance all or part of a nonexempt proposal (or part of a proposal)” (WAC 197-11-714(3)). Typically, this refers to a local, state or federal agency with licensing or permitting approval responsibility concerning the project.

Additional permits/approvals may be identified during the review process associated with the specific development projects.

City of Seattle Permits and Approvals:

Alternative 1

- Council approval of updated redevelopment plan
- Council approval of rezone of portions of the property from SF 7200 to Lowrise 3 zoning, and approval of any necessary amendments to Subchapter II of Chapter 23.34 to accommodate such a rezone
- Council authorization of property conveyances, including acquisition and subsequent sale of parcels designated for housing development, and execution of necessary easement agreements
- Preliminary and final plat approvals
- Council approval of funding for acquisition and development
- Land use, building and grading permit approvals

Alternative 2

- Preliminary and final plat approvals
- Council approval of rezone of the Talaris site from SF 5000 to Lowrise 3, and approval of any necessary amendments to Subchapter II of Chapter 23.34 to accommodate such a rezone
- Council approval of an amendment to the Comprehensive Plan to designate the Talaris site as multifamily
- Land use, building and grading permit approvals

Alternative 3

- Council approval of updated redevelopment plan
- Council authorization of property conveyances, including acquisition and subsequent sale of parcels designated for housing development, and execution of necessary easement agreements
- Council approval of funding for acquisition and development of park spaces
- Council approval of rezone of the Talaris site from SF 5000 to Lowrise 3, and approval of any

necessary amendments to Subchapter II of Chapter 23.34 to accommodate such a rezone

- Council approval of amendments to the Comprehensive Plan to designate the Talaris site as multifamily
- Land use, building and grading permit approvals

Federal and/or State Permits and Approvals:

Alternative 1

- Completion of updated National Environmental Policy Act (NEPA) review
- HUD and Department of Interior approval of applications for public benefit conveyances
- U.S. Army approval of negotiated sale for portions of the property

Alternative 2

- Completion of updated National Environmental Policy Act (NEPA) review
- U.S. Army approval of negotiated sale for the entire property

Alternative 3

- Completion of updated National Environmental Policy Act (NEPA) review
- Department of Interior approval of applications for public benefit conveyances

EIS Authors and Principal Contributors

EA Engineering, Science and Technology, Inc., PBC

- SEIS Project Manager, Primary Author: Summary; Project Description; Environmental Health; Land Use/Relationship to Plans and Policies; Aesthetics/Light and Glare; Recreation and Open Space; Public Services; Housing/Socioeconomics; Environmental Justice.

SMR Architects

- EIS Alternative Site Plans

Tiscareno Architects

- Visual Simulation, Shadow Diagrams

Landau Associates

- Earth, Air Quality and Noise

Watershed Company

- Biological Resources

Cultural Resource Consultants, Inc.

- Historic and Cultural Resources

Heffron Transportation

- Transportation

MIG|SVR

- Utilities

Location of Background Information

Background material and supporting documents are available at the offices of:

EA Engineering, Science and Technology, Inc., PBC

2200 Sixth Avenue, Suite 707
Seattle, WA 98121

Seattle Office of Housing

Lindsay Masters
Seattle Municipal Tower
700 5th Avenue, #5800
Seattle, WA 98124-4725
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Email: lindsay.masters@seattle.gov

Date of Issuance of this DEIS

December 14, 2017

Date DEIS Comments Are Due

January 29, 2018

Written comments may be submitted to:

Mail:

Lindsay Masters
Office of Housing
PO Box 94725
Seattle, WA 98124-4725

Telephone: 206.684.0340

Email: OH_Comments@seattle.gov

Date of DEIS Public Meeting

A public meeting on this DEIS is scheduled for January 9, 2018, at 6 PM at:

Magnolia United Church of Christ
3555 W McGraw Street
Seattle, WA 98119

The purpose of this public meeting is to provide an opportunity for agencies, organizations and individuals to provide comments on the *Fort Lawton Army Reserve Center Redevelopment Project DEIS*.

Availability of this DEIS

Copies of this DEIS have been made available to agencies, organizations and individuals noted on the Distribution List. This DEIS can be reviewed at:

- **Seattle Office of Housing**
Seattle Municipal Tower
700 5th Avenue, #5700
Seattle, WA 98104

A limited number of complimentary CD copies of this DEIS may be obtained from the Office of Housing while the supply lasts. Additional CD copies may be purchased for the cost of reproduction.

The DEIS can also be reviewed and downloaded online at:

<http://www.seattle.gov/housing/ft-lawton>

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Chapter 1

Summary

CHAPTER 1

SUMMARY

1.1 INTRODUCTION

This chapter provides a summary of the Draft Environmental Impact Statement (DEIS) for the *Fort Lawton Army Reserve Center Redevelopment Project* (also referred to as the Fort Lawton project). It briefly describes the Proposed Actions and alternatives; contains an overview of significant environmental impacts identified for the Proposed Actions; and, provides a list of mitigation measures, and significant unavoidable adverse impacts. Please see **Chapter 2** of this DEIS for a more detailed description of the Proposed Actions and alternatives and **Chapter 3** for a detailed presentation of the affected environment, significant impacts of the Proposed Actions, mitigation measures and significant unavoidable adverse impacts.

Seattle Office of Housing (the project applicant) is considering redevelopment options including housing and park uses for the Fort Lawton U.S. Army Reserve Center site. The approximately 34-acre site currently contains six buildings. The City's goals are to produce supportive housing for formerly homeless people and affordable rental and ownership housing for low-income families and individuals, and create public park uses (including active and passive uses) and meet park maintenance needs. Full buildout of the project is expected to occur over an approximately 7-year period. For purposes of the DEIS analysis, 2025 is the assumed buildout year.

Potential redevelopment of the Talaris site is also studied in this DEIS. This site is included only as an example of a possible off-site alternative for the affordable and formerly homeless housing. It is provided in order to conceptually analyze probable adverse impacts that would be expected with redevelopment at that site or other off-site locations in the City. Additional more detailed SEPA review of the Talaris site, or another off-site location, would be required should that or another site ultimately be selected for the affordable and formerly homeless housing.

1.2 PROPOSED ACTIONS

The Proposed Actions for the Fort Lawton Project include the following:

- City Council approval of an updated redevelopment plan;
- City Council approval of a legislative rezone of portions of the Fort Lawton site from SF 7200 to a lowrise zoning classification, and approval of any necessary amendments to Subchapter II of Chapter 23.34 to accommodate such a rezone;

- City Council authorization of public property conveyances from the U.S. Army to the City of Seattle, including acquisition and subsequent sale of parcels designated for housing development and execution of necessary easement agreements;
- Preliminary and final plat approvals;
- City Council approval of funding for acquisition and development; and
- Land use, building and construction permit approvals.

1.3 DEIS ALTERNATIVES

For the purposes of environmental review, the environmental impacts of four alternatives are analyzed in this DEIS, including three development alternatives – Alternatives 1, 2 and 3 -- and a No Action Alternative. The range of alternatives allows for the analysis of environmental impacts that: 1) encompasses a range a reasonable range of land uses and densities; 2) meets the applicant's objectives; and, 3) provides decision makers with relevant information needed to make decisions about the Proposed Actions. Not all the alternatives would require the same set of actions. For example, Alternative 2 would not require rezone of a portion of the Fort Lawton site to a lowrise zoning classification or public property conveyances. The environmental impacts of the Proposed Actions are evaluated in the context of each alternative.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant's Preferred Alternative)

Under Alternative 1, assumed development would feature a mix of affordable housing on the Fort Lawton site, including affordable rental and ownership and formerly homeless housing. A portion of the site would be rezoned to lowrise residential zoning. Public park uses would also be created, including active park facilities, preserved existing natural areas and conversion of an existing structure to a park maintenance facility. More specifically, the project under Alternative 1 would include 238 total housing units with 85 senior supportive apartments (plus one manager unit), 100 affordable rental units and 52 affordable ownership units. The project would also provide 21.6 acres of parks and recreation area, including two multi-purpose fields, a park maintenance facility and 266 parking spaces. All existing buildings on the Fort Lawton site except OMS - Building 245 would be demolished and removed. OMS Building 245 would be preserved as a parks maintenance facility.

No development would occur on the Talaris site under Alternative 1.

Alternative 2 – Market-Rate Housing Onsite; Affordable and Homeless Housing Offsite

Under Alternative 2, development of market-rate single-family housing under current zoning is assumed on the Fort Lawton site, and construction of affordable and formerly homeless housing would occur on the Talaris site. Alternative 2 would include 113 market-

rate residences with 254 parking spaces on the Fort Lawton site. The Talaris site would include 238 affordable housing units (with the same numbers of senior, rental and affordable ownership units as Alternative 1), approximately 30,621 sq. ft. of community facilities and 295 parking spaces. The project would not provide any active or passive public parks on either the Fort Lawton or Talaris sites. All existing buildings on the Fort Lawton site would be demolished and removed. The buildings on the Talaris site would be retained and reused; new buildings would be constructed on the site as well.

Alternative 3 – Public Park Onsite; Affordable and Homeless Housing Offsite

Under Alternative 3, the entire Fort Lawton site would be developed as a public park; construction of affordable and formerly homeless housing would occur at the Talaris site. Alternative 3 would include approximately 34 acres of park and recreation uses, including three multi-purpose fields and 90 parking spaces on the Fort Lawton site; and approximately 238 affordable housing units, 30,621 sq. ft. of community facilities and 295 parking spaces on the Talaris site (with the same numbers of senior, rental, and affordable ownership units as Alternative 1). All existing buildings on the Fort Lawton site except OMS - Building 245 would be demolished and removed. OMS Building 245 would be preserved as a parks maintenance facility. All existing buildings on the Talaris site would be retained and reused; new buildings would be constructed on the site as well.

Alternative 4 – No Action Alternative

Under the No Action Alternative, the Fort Lawton site would remain in its existing vacant condition. The property would not be conveyed by the U.S. Army to the City of Seattle per the BRAC process. The City would terminate its lease of the property and the Army would resume maintenance of the site and facilities. Buildings and infrastructure would likely continue to deteriorate. The site could be conveyed to the City or conveyed or sold to another entity in the future, and could be developed in accordance with the uses allowed by the site's current SF 7200 zoning.

1.4 IMPACTS

Table 1-1 highlights the significant impacts that would potentially result from the alternatives analyzed in this DEIS. This summary table is not intended to be a substitute for the complete discussion of each element that is contained in Chapter 3.

**Table 1-1
SIGNIFICANT IMPACTS SUMMARY MATRIX**

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
3.1 EARTH			
Fort Lawton Site			
<ul style="list-style-type: none"> • A minimal amount of grading and placing/compacting of structural fill would be required (11,000 CY of soil moved, with no imported or exported fill). • The potential for impacts from landslides is considered moderately low. • The potential for impacts to site structures during seismic events is considered minimal. Seismic design using current design codes and engineering standards/practices would reduce these hazards. • Impervious surfaces would decrease from 18.5 under existing conditions to 13.2 acres, with a possible increase in recharge to the aquifer beneath site. 	<ul style="list-style-type: none"> • Similar grading would occur as Alternative 1. Construction of retaining walls and/or deep foundations could also be necessary. • The possibility for landslides to occur would be greater than under Alternative 1. • Impacts would be similar to Alternative 1. • Impervious surfaces would decrease to 15.3 acres. 	<ul style="list-style-type: none"> • Impacts would be similar to Alternative 1. • Impacts would be similar to Alternative 1. • Impacts would be similar to Alternative 1. • Impervious surfaces would decrease to 9.4 acres. 	<ul style="list-style-type: none"> • The site would not be redeveloped at this time, and earth-related conditions would continue as under existing conditions.
Talaris Site			
<ul style="list-style-type: none"> • The site would not be redeveloped at this time, and earth-related conditions would continue as under existing conditions. 	<ul style="list-style-type: none"> • A minimal amount of grading and placing/compacting structural fill would occur. Any fill needed onsite would be imported. • Portions of the site are underlain by soft deposits. Techniques such as deep foundation systems would be implemented to address potential settlement impacts. • The potential for landslide impacts is considered moderately low. Site-specific analysis would be conducted prior to construction. • Ice contact and recessional outwash and relatively thick peat on site could increase susceptibility to amplified earthquake ground motions. Liquefiable soils would have a moderate to high seismic risk. Site-specific slope stability analyses and design/construction of structure would address these potential impacts. • Impervious surfaces would increase from 30% to 50% of the site. No significant loss of recharge to the aquifer beneath the site is expected. 	<ul style="list-style-type: none"> • Impacts would be the same as Alternative 2 because the same development is proposed. 	<ul style="list-style-type: none"> • The site would not be redeveloped at this time, and earth-related conditions would continue as under existing conditions.
3.2 BIOLOGICAL RESOURCES			
Fort Lawton Site			
<ul style="list-style-type: none"> • Construction equipment activity and noise could potentially disturb wildlife and habitat. 	<ul style="list-style-type: none"> • More potential impact to wildlife and habitat than Alternative 1 with more of the site developed. 	<ul style="list-style-type: none"> • Impacts would be similar to Alternative 1. 	<ul style="list-style-type: none"> • The site would not be redeveloped at this time, and biological resources would continue as under existing conditions.

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
<ul style="list-style-type: none"> Open space would increase from 45% of the site under existing conditions to 61% of the site. Existing forested habitat areas would be preserved in the north and south parts of the site. No direct impacts to critical areas, vegetation that provides wildlife habitat or sensitive wildlife species is expected. Indirect impacts to retained habitat could occur due to increased human activity, lighting, noise, the use of fertilizers, pesticides and herbicides, and the introduction of domestic dogs and cats. Stormwater runoff could carry pollutants to downstream water resources. With installation and operation of the temporary and permanent stormwater control systems, no significant impacts to biological resources downstream are anticipated. 	<ul style="list-style-type: none"> Open space would increase to 55% of the site. Forested habitat would be completely or partially developed. Direct impacts to biological resources include: impacts to wetland areas, removal of forested vegetation and wildlife habitats and displacement or loss of wildlife. Impacts would be similar to Alternative 1, with the additional potential for indirect impacts from development adjacent to the potential wetland. Impacts would be similar to Alternative 1, 	<ul style="list-style-type: none"> Open space would increase to 73% of the site. Existing forested habitat areas would be preserved in the north and south parts of the site. Impacts would be similar to Alternative 1. Impacts would be similar to Alternative 1. Impacts would be similar to Alternative 1. 	
Talaris Site			
<ul style="list-style-type: none"> The site would not be redeveloped at this time, and biological resources would continue as under existing conditions. 	<ul style="list-style-type: none"> Construction equipment activity and noise could potentially disturb wildlife and habitat. 50% of the site would be in open space, less than under existing conditions. Much of the existing landscaping, which contributes to on-site habitat, would be retained under this alternative. Development would avoid direct impacts to the wetland area. Indirect impacts to wildlife would increase due to human activities, including building, parking lot and roadway lighting; noise; and use of fertilizers, pesticides and herbicides in landscape Stormwater runoff could carry pollutants to downstream water resources. With installation and operation of the temporary and permanent stormwater control systems, no significant impacts to biological resources downstream are anticipated. 	<ul style="list-style-type: none"> Impacts would be the same as Alternative 2 because the same development is proposed. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and biological resources would continue as under existing conditions.
3.3 AIR QUALITY			
Fort Lawton Site			
<ul style="list-style-type: none"> Construction activities could impact air quality. Most impacts would be temporary and far outweighed by existing regional emissions. Construction would comply with PSCAA regulations to minimize air quality impacts. 	<ul style="list-style-type: none"> Impacts would be similar to Alternative 1. 	<ul style="list-style-type: none"> Impacts would be similar to under Alternative 1, but somewhat less since construction of new residential development would not occur. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and air quality and GHG conditions would continue as under existing conditions.

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
<ul style="list-style-type: none"> Projected average annual GHG emissions are estimated to be 4,012 MTTCO_{2e} per year and would not meet Ecology's threshold for significance. 	<ul style="list-style-type: none"> Projected average annual GHG emissions are estimated to be 5,949 MTTCO_{2e} per year, including GHG emissions from the Talaris site, and would not meet Ecology's threshold for significance. 	<ul style="list-style-type: none"> Projected average annual GHG emissions are estimated to be 4,012 MTTCO_{2e} per year, including GHG emissions from the Talaris site, and would not meet Ecology's threshold for significance. 	
Talaris Site			
<ul style="list-style-type: none"> The site would not be redeveloped at this time, and air quality and GHG conditions would continue as under existing conditions. 	<ul style="list-style-type: none"> Construction activities could impact air quality. Most impacts would be temporary and far outweighed by existing emissions in the region. Construction would comply with PSCAA regulations to minimize air quality impacts. Projected average annual GHG emissions are estimated to be 5,949 MTTCO_{2e} per year, including GHG emissions from the Fort Lawton site, and would not meet Ecology's threshold for significance. 	<ul style="list-style-type: none"> Impacts would be the same as Alternative 2 because the same development is proposed. Projected average annual GHG emissions are estimated to be 4,012 MTTCO_{2e} per year, which includes GHG emissions from the Fort Lawton site and would not meet Ecology's threshold for significance. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and air quality and GHG conditions would continue as under existing conditions.
3.4 NOISE			
Fort Lawton Site			
<ul style="list-style-type: none"> Construction activities would be accompanied by temporary increases in noise Estimated increases in traffic-related noise of <1 to 4 dBA could occur. No significant impacts are expected. Operational noise under Alternative 1 would be generated by multi-family residential, parks/recreation, senior support service and maintenance facility uses at the Fort Lawton site. Forested buffers would reduce noise impacts from the site on surrounding areas. No significant impacts are expected. 	<ul style="list-style-type: none"> Impacts would be similar to Alternative 1. Impacts would be similar to Alternative 1. Operational noise under Alternative 2 would be generated by single-family residences. Noise associated with these residences is expected to be minimal. 	<ul style="list-style-type: none"> Impacts would be similar to Alternative 1. Impacts would be similar to Alternative 1. Operational noise would be greater than under Alternative 1 because there would be one additional multi-purpose field. As with Alternative 1, forested buffers would reduce the impact of noise. No significant impacts are expected. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and noise sources would continue as under existing conditions.
Talaris Site			
<ul style="list-style-type: none"> The site would not be redeveloped at this time, and noise sources would continue as under existing conditions. 	<ul style="list-style-type: none"> Construction activities would be accompanied by temporary increases in noise Estimated increases in traffic-related noise of <1 dBA could occur and is not expected to be significant. Operational noise under Alternative 2 would be generated by multi-family residences and senior support service uses. Noise associated with these uses is expected to be minimal. 	<ul style="list-style-type: none"> Impacts would be the same as Alternative 2 because the same development is proposed. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and noise sources would continue as under existing conditions.
3.5 ENVIRONMENTAL HEALTH			
Fort Lawton Site			
<ul style="list-style-type: none"> Air pollutants could be generated during construction. Demolition activities would be conducted according to applicable air quality regulations and no significant impacts are expected. 	<ul style="list-style-type: none"> Impacts would be similar to Alternative 1. 	<ul style="list-style-type: none"> Impacts would be similar to Alternative 1. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and environmental health conditions would continue as under existing conditions. Buildings and infrastructure would likely continue to deteriorate, and hazardous materials associated with the buildings would not be removed or properly disposed of at this time.

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
<ul style="list-style-type: none"> Existing buildings may contain asbestos, lead based paint and PCBs which could be disturbed during demolition. Construction activities would adhere to requirements to minimize the potential for workers to be exposed to hazardous materials. No significant impacts are expected. Undocumented underground storage tanks or contaminants could be discovered during construction. Any tanks or contamination discovered would be handled in accordance with applicable investigation and cleanup provisions. Accidental spills of construction-related chemicals could occur during construction resulting in polluted stormwater runoff entering surface waters. A stormwater pollution prevention plan (SWPPP) would be prepared and adhered to prevent and respond to accidental spills. Future residential uses could misuse and improperly dispose of household cleaners, yard fertilizers and pesticides, etc. 	<ul style="list-style-type: none"> Impacts would be similar to Alternative 1. Impacts would be similar to Alternative 1. Impacts would be similar to Alternative 1. Impacts would be similar to Alternative 1. 	<ul style="list-style-type: none"> Impacts would be similar to Alternative 1. Impacts would be similar to Alternative 1. Impacts would be similar to Alternative 1. Impacts would be less than Alternative 1 because there would no residential units. 	
Talaris Site			
<ul style="list-style-type: none"> The site would not be redeveloped at this time, and environmental health conditions would continue as under existing conditions. 	<ul style="list-style-type: none"> A Phase I Environmental Site Assessment would likely be conducted to determine the environmental condition of the site. The potential for construction impacts on environmental health would be similar to under Alternative 1. Applicable regulations would be adhered to including development of a SWPPP. Future residential uses could misuse and improperly dispose of household clears, fertilizers, pesticides, etc. 	<ul style="list-style-type: none"> Impacts would the same as Alternative 2 because the same development is proposed. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and environmental health conditions would continue as under existing conditions.
3.6 LAND USE			
Fort Lawton Site			
<ul style="list-style-type: none"> Development would include: <ul style="list-style-type: none"> 238 affordable housing units; 21.6 acres of parks and recreation area two multipurpose fields; and 266 parking spaces. Redevelopment would require a portion of the site be rezoned from SF 7200 to a lowrise residential zone. Temporary impacts to adjacent land uses over the buildout period (i.e. dust, air emissions, noise and increased traffic) may occur. Due to the temporary nature of construction and required compliance with City of Seattle construction code regulations, no significant impacts are expected. 	<ul style="list-style-type: none"> Development would include: <ul style="list-style-type: none"> 113 new market-rate housing units; and 254 parking spaces. No zoning reclassification required. Construction impacts would be similar to Alternative 1. 	<ul style="list-style-type: none"> Development would include: <ul style="list-style-type: none"> 34.0 acres of public park and recreational areas; including three multi-purpose fields; and 90 parking spaces. No zoning reclassification required. Construction impacts to off-site land uses would be similar to but less than under Alternative 1, because no housing would be developed onsite. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and land uses would continue as under existing conditions. The U.S. Army may choose to retain the property in caretaker status, or could sell it to another party. Development could occur in the future in accordance with the site's SR 7200 zoning.

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
<ul style="list-style-type: none"> Residential uses would increase densities and activity levels on the site. Park uses would increase activity levels as well. Significant adverse impacts on surrounding land uses are not expected due to the compatibility of proposed uses with off-site uses, layout of uses, provision of buffers/separation, and the lack of vehicular/pedestrian connection to certain off-site uses. 	<ul style="list-style-type: none"> Residential uses would increase densities and activity levels onsite. Impacts would be less than Alternative 1. Significant adverse impacts on surrounding land uses are not expected due to the compatibility of proposed uses with off-site uses. 	<ul style="list-style-type: none"> New park facilities (particularly multi-use fields) would result in increased activity levels on the site, greater than under Alternative 1. Density would not increase onsite as no new building development would occur. Significant adverse impacts on surrounding land uses are not expected due to the compatibility of proposed uses with off-site uses, provision of buffers/separation and the lack of connection to certain off-site uses. 	
Talaris Site			
<ul style="list-style-type: none"> The site would not be redeveloped at this time and land uses would continue as under existing conditions. 	<ul style="list-style-type: none"> Development would include: <ul style="list-style-type: none"> 238 affordable housing units; 30,621 sq. ft. of community facilities; 295 parking spaces; and Open space. Redevelopment would require a portion of the site be rezoned from SF 5000 to a lowrise residential zone; a Comprehensive Plan amendment would also be required. Potential construction impacts would be similar to those described for under Alternative 1. Increases in densities and activity levels would occur onsite; however, there would be no activity from recreational uses. Significant adverse impacts on surrounding land uses are not expected due to the compatibility of proposed uses with off-site uses, layout of uses, and provision of buffers/separation from off-site uses. 	<ul style="list-style-type: none"> Impacts would be the same as Alternative 2 because the same development is proposed. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and land uses would continue as under existing conditions. Development could occur in the future in accordance with the site's SR 5000 zoning.
3.7 AESTHETICS/VISUAL RESOURCES			
Fort Lawton Site			
<ul style="list-style-type: none"> Development would change the visual character of the site to multi-family housing and open space/park facilities. Housing would be in new 30 to 40-foot tall buildings, primarily in the west and central portions of the site. 	<ul style="list-style-type: none"> Development would change the visual character of the site to single-family residences. New single-family homes would generally be a maximum of 30 feet tall and would generally be located throughout the site. 	<ul style="list-style-type: none"> Development would change the visual character of the site to new park/recreational areas. Passive recreation would be located in the north and south portions of the site, and multi-use fields in the central portion of the site. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and aesthetics, views, light and glare and shadows would continue as under existing conditions.

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
<ul style="list-style-type: none"> • Views: New development would be visible from the Fort Lawton Military Cemetery (Viewpoint 2). From the East Boundary of Discovery Park (Viewpoint 3), new buildings would generally be located in similar areas as existing buildings, but would be taller and denser. From the Secondary Entrance at Texas Way (Viewpoint 6), the general view would not differ substantially from existing conditions. From 36th Avenue West (Viewpoint 9), townhouses may be partially visible, although existing mature trees would continue to provide a visual buffer. No significant view impacts are expected, including on views protected by the City. • Light: Redevelopment would add new sources of light on the site, including interior and exterior building and vehicle lights. Light spillage is not expected to be significant and existing mature trees would continue to serve as a partial buffer in certain locations. • Glare: Redevelopment would increase glare, including from vehicles and building facades. Significant glare impacts are not expected. • Shadows: Most shadows from development would remain onsite, except for some that would extend onto adjacent portions of Discovery Park in the winter. No significant shadow impacts are expected. 	<ul style="list-style-type: none"> • Views: From Viewpoint 2, single-family homes would comprise a more substantial portion of the view than under Alternative 1. From Viewpoint 3, view impacts would be similar to those under Alternative 1. From Viewpoint 6, views of the development would be similar to Alternative 1, although portions of the development may be visible through certain sections of existing trees. From Viewpoint 9, buildings would be similar in height and bulk to existing residences to the east of the site, and existing mature trees would continue to provide a visual buffer. No significant view impacts are expected, including on views protected by the City. • Light: Impacts would be similar to but less than Alternative 1 because fewer residential uses and no park uses would be built. Light spillage is not expected to be significant. • Glare: Similar to Alternative 1, although less due to fewer residential units onsite. • Shadows: Similar to Alternative 1 	<ul style="list-style-type: none"> • Views: No view impacts are anticipated since no building development would occur on the site. • Light: The amount of light from new sources would be much less than under Alternatives 1 and 2, although passive and active recreation areas would increase mobile sources of light from vehicles. • Glare: The amount of glare from new sources would be much less than under Alternatives 1 and 2, although passive and active recreation areas would increase mobile sources of glare from vehicles. • Shadows: No new shadows would be generated. 	
Talaris Site			
<ul style="list-style-type: none"> • The site would not be redeveloped at this time, and aesthetic, view, light and glare and shadows would continue as under existing conditions. 	<ul style="list-style-type: none"> • Development would change the visual character of the Talaris site from a conference center in a park-like setting to multi-family housing and open space areas. Some housing would occupy existing, renovated buildings, while other new housing would be in new 30 to 40-foot tall buildings, primarily in the west and south portions of the site. • Views: There are no City-designated viewpoints in the immediate vicinity. Any potential modifications to designated City historic landmark site would need to obtain a Certificate of Approval by the City of Seattle’s Landmarks Preservation Board. • Light: Redevelopment would add new sources of light on the site, including interior and exterior building lighting and vehicle lights. The amount of light spillage is not expected to be significant and existing mature trees would continue to serve as a partial buffer in certain locations. 	<ul style="list-style-type: none"> • Impacts would be the same as Alternative 2 because the same development is proposed. 	<ul style="list-style-type: none"> • The site would not be redeveloped at this time, and aesthetic, view, light, and glare and shadows would continue as under existing conditions.

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
	<ul style="list-style-type: none"> • Glare: Redevelopment would increase glare, including from vehicles and building facades. Significant glare impacts are not expected. • Shadows: Most shadows from potential development would remain onsite; no shadows would extend onto parks. 		
3.8 RECREATION/OPEN SPACE			
Fort Lawton Site			
<ul style="list-style-type: none"> • 21.6 acres of public park and recreation facilities would be provided, including 13.0 acres for passive recreation and 5.1 acres for active recreation with two multi-purpose fields. Up to 4.7 acres of forest land could be dedicated by the U.S. Army to Discovery Park. • Based on the estimated number of residents (586 people), there would be demand for approximately 4.7 acres of parks and recreation area. New demand would be addressed by proposed park and recreation facilities onsite, and the possible dedication by the U.S. Army of 4.7 acres to Discovery Park. 	<ul style="list-style-type: none"> • No new recreation facilities would be developed. Up to 4.7 acres of forested land could become open space. • Based on the estimated number of residents (263 people), there would be demand for approximately 2.1 acres of parks and recreation area. This demand could be addressed by the developer of the site purchasing the approximately 4.7 acres in the west part of the site from the U. S. Army and using it as private open space for resident; or this area could be purchased by the City for future public use. 	<ul style="list-style-type: none"> • 29.0 acres of public park and recreation facilities would be provided, including, 17.0 acres for passive recreation and 7.6 acres for active recreation with three multi-purpose fields. Up to 4.7 acres of forest land could be dedicated by the U.S. Army to Discovery Park. • No increase in demand for park and recreation facilities would occur. The proposed park and recreation facilities would provide an additional amenity for nearby residents and the city of Seattle, and would help satisfy the approximately 40 acres of parkland needed in Seattle by 2035. 	<ul style="list-style-type: none"> • The site would not be redeveloped at this time, and open space conditions onsite would continue as under existing conditions. • No additional park or recreation demand would be created or satisfied. No new parks and recreational facilities would be developed on the site that would help satisfy the parkland needed by the City by 2035.
Talaris Site			
<ul style="list-style-type: none"> • The site would not be redeveloped at this time, and open space conditions onsite would continue as under existing conditions. 	<ul style="list-style-type: none"> • No new park or recreation facilities would be developed under Alternative 2. Some open space areas (pond, forested areas) and walkways would be retained. • Based on the estimated number of residents (586 people), there would be demand for approximately 4.7 acres of parks and recreation area. This demand could result in increased use of nearby parks. On-site walkways and open space areas could fulfill a portion of the demand. 	<ul style="list-style-type: none"> • Impacts would be the same as Alternative 2 because the same development is proposed. 	<ul style="list-style-type: none"> • The site would not be redeveloped at this time, and open space conditions onsite would continue as under existing conditions. • No additional parks/recreation demand would be created or satisfied. No new parks and recreational facilities would be developed on the site that would help satisfy the parkland needed by the City by 2035.
3.9 HISTORIC AND CULTURAL RESOURCES			
Fort Lawton Site			
<ul style="list-style-type: none"> • Except for OMS Building 245, all existing buildings and structures on site would be demolished. None of the existing buildings are listed in the NRHP. Existing buildings to be removed would need to be referred to the City Landmarks Preservation Board (LPB) for consideration. If a building is determined eligible for City Landmark status, requirements would be determined by the LPB. • The adjacent Fort Lawton Cemetery would not be indirectly (e.g., visually) affected by redevelopment under Alternative 1. 	<ul style="list-style-type: none"> • All buildings and structures would be demolished. Like Alternative 1, existing buildings to be removed would need to be referred to the City LPB for consideration. If a building is determined eligible for City Landmark status, requirements would be determined by the LPB. • Indirect impacts to the adjacent Fort Lawton Cemetery could occur due to the construction of a road and housing in proximity to the eastern cemetery boundary. This could affect the cemetery's integrity of setting through the introduction of new built environmental elements. An undeveloped buffer could be retained around the cemetery to address this impact. 	<ul style="list-style-type: none"> • Impacts would be the same as Alternative 1. • Indirect impacts to the Fort Lawton Cemetery are not anticipated because new construction would not occur adjacent to the cemetery. A forested buffer would be retained east of the cemetery, and multi-use field would be located north of the cemetery. 	<ul style="list-style-type: none"> • The site would not be redeveloped and historic and cultural resources would continue as under existing conditions. Buildings at Fort Lawton would likely continue to deteriorate. The U.S. Army may sell or retain the property in caretaker status.

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
<ul style="list-style-type: none"> The probability of impacts to archaeological resources under Alternative 1 is considered low. 	<ul style="list-style-type: none"> Although Alternative 2 could include more overall ground disturbance, the likelihood of impacting archaeological resources is considered to be low. 	<ul style="list-style-type: none"> The potential for impacts to archaeological resources would be low, similar to Alternatives 1 and 2. 	
Talaris Site			
<ul style="list-style-type: none"> The Talaris site would not be redeveloped at this time, and any historic or cultural resources would continue as under existing conditions. 	<ul style="list-style-type: none"> All the site’s major buildings and reused, and most of the landscaping would be retained. However, impacts to this designated Seattle Landmark and NRHP-eligible site could be generated by proposed alterations to the existing site and buildings. Development would require a Certificate of Approval from the City to ensure that modifications do not significantly compromise the site’s landmark status. The Talaris site is considered to have a moderate potential for as-yet unknown archaeological sites and proposed development could result in localized impacts to archaeological resources. With implementation of legally-required measures, no significant impacts are expected. 	<ul style="list-style-type: none"> Impacts would be the same as Alternative 2 because the same development is proposed. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and any historic or cultural resources would continue as under existing conditions. Future use and development of the property would be subject to the City’s Certificate of Approval process because it has been designated a Seattle Landmark.
3.10 TRANSPORTATION			
Fort Lawton Site			
<ul style="list-style-type: none"> Truck traffic and employee traffic would be generated during construction activities. The vicinity roadway system would be able to accommodate construction traffic. No significant impacts expected. Alternative 1 would generate daily vehicle trips at buildout as follows: <ul style="list-style-type: none"> - 1,260 vehicle trips per day - 64 AM peak hours trips - 216 PM peak hour trips All study area intersections are expected to continue operating at LOS B or better, with slight increases in delay from additional trips generated by Alternative 1. Proposed parking would meet Code requirements. Peak parking demand could exceed supply by up to 28 spaces. This would be addressed through parking management strategies, including: providing a shared bicycle fleet or encouraging use of bike sharing programs, encouraging use of car sharing programs or providing information about bus service. Parking could also be shared with uses on and adjacent to the site. Although traffic at study area intersections would increase, which could increase the number of collisions, new safety issues in the neighborhood are not expected. 	<ul style="list-style-type: none"> Similar to Alternative 1. Alternative 2 would generate daily vehicle trips at buildout as follows: <ul style="list-style-type: none"> - 700 vehicle trips per day - 55 AM peak hours trips - 55 PM peak hour trips Fewer peak hours trips would occur than under Alternative 1; all study intersections would operate at the same or better levels than under Alternative 1. Proposed parking would meet Code requirements. Peak parking demand would be accommodated by the proposed parking supply. Alternative 2 is not expected to result in new safety issues. 	<ul style="list-style-type: none"> Similar to Alternative 1. Alternative 3 would generate daily vehicle trips at buildout as follows: <ul style="list-style-type: none"> - 570 vehicle trips per day - 0 AM peak hours trips - 210 PM peak hour trips The same number of PM peak hour trips as Alternative 1 would be generated, and study intersections would operate at similar levels. Proposed parking would meet Code requirements. Peak parking demand could exceed supply by 9 spaces. This would be addressed by parking management strategies and possibly by shared parking. Traffic safety impact would be similar to under Alternative 1. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and the transportation system and traffic conditions would remain as under existing conditions.

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
<ul style="list-style-type: none"> Alternative 1 is expected to generate 28 peak hour transit trips. Existing bus service would be adequate to serve this demand. New non-motorized facilities (e.g., sidewalks and pedestrian crosswalks) would be constructed according to City standards and no adverse non-motorized impacts are expected. 	<ul style="list-style-type: none"> Alternative 2 is expected to generate 21 peak hour transit trips and would not adversely affect transit service. Pedestrian facility upgrades would be similar to those described for Alternative 1. 	<ul style="list-style-type: none"> Alternative 3 is expected to generate little to no transit use. Pedestrian facility upgrades would be similar to those described for Alternative 1. 	
Talaris Site			
<ul style="list-style-type: none"> The site would not be redeveloped at this time, and the transportation system and traffic conditions would remain as under existing conditions. 	<ul style="list-style-type: none"> Construction activities and the associated potential for impacts on the transportation system and traffic on and in the site vicinity would be similar to under Alternative 1. Alternative 2 would generate daily vehicle trips at buildout as follows: <ul style="list-style-type: none"> - 880 vehicle trips per day - 64 AM peak hours trips - 76 PM peak hour trips Alternative 2 would add less than one second of delay to two intersections projected to operate at LOS F and E. This increased delay is not considered a significant impact. It is the City's long-standing precedent that delay increases less than 5 seconds at an intersection are not significant. Proposed parking would meet Code requirements. Peak parking demand would be accommodated by the proposed supply. Although traffic at study area intersections would increase, which could increase the number of collisions, new safety issues in the neighborhood are not expected. Alternative 2 is expected to generate 17 peak hour transit trips and existing bus service would be adequate to serve this demand. New non-motorized facilities would be constructed according to City standards and no adverse non-motorized impacts are expected. 	<ul style="list-style-type: none"> Transportation impacts would be the same as described for Alternative 2 because the same development is proposed. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and the transportation system and traffic conditions would remain as under existing conditions.
3.11 PUBLIC SERVICES			
Fort Lawton Site			
<ul style="list-style-type: none"> Construction activities could temporarily increase demand for police service. Police demands could also incrementally increase during project operation due to increases in on-site population. Seattle Police Department (SPD) has the capacity to meet the increased police service needs. 	<ul style="list-style-type: none"> Construction and operational demand for police services is anticipated to be less than under Alternative 1 because fewer residential units and no park uses would be developed. 	<ul style="list-style-type: none"> Construction and operational demand for police services is anticipated to be less than under Alternatives 1 and 2, because no housing would be developed. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time and public services would continue as under existing conditions.

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
<ul style="list-style-type: none"> Construction activities could temporarily increase Seattle Fire Department (SFD) service calls. Increases in on-site population and new park/recreational uses could increase fire and EMS calls. SFD staffing has the capacity to meet the increased fire/EMS service needs. Development could generate approximately 41 new students. Students added to Lawton Elementary would contribute to a school that is projected to be over capacity. Magnolia Elementary and Lincoln High School are slated to be operational by 2019, which is expected to help absorb demand in the surrounding area. 	<ul style="list-style-type: none"> Potential construction and operational increases in demand for fire and emergency services would be less than under Alternative 1 because fewer residential units and no park uses would be developed. Development could generate approximately 31 new students, with the same school capacity restrictions as under Alternative 1. Magnolia Elementary and Lincoln High School are expected to help absorb demand in the surrounding area. 	<ul style="list-style-type: none"> Potential construction and operational increases in demand for fire and emergency services would be less than under Alternatives 1 and 2 because no housing would be developed under Alternative 3. No new students would be generated under Alternative 3 and no impacts to public school service would occur. 	
Talaris Site			
<ul style="list-style-type: none"> The site would not be redeveloped at this time, and public services would continue as under existing conditions. 	<ul style="list-style-type: none"> Construction activities could temporarily increase demand for police service. Existing SPD staff would have the capacity to continue to meet police service needs. Police service demands could also incrementally increase during project operation due to increases in on-site population. SPD has the capacity to meet the increased police service needs. Construction activities could temporarily increase SFD service calls. Increases in on-site population could increase fire and EMS calls, but less than under Alternative 1. SFD staffing has the capacity to meet the increased fire/EMS service needs. Development could generate approximately 47 new students. Students added to Eckstein Middle School would contribute to a school that is projected to be over capacity. SPS's annual planning process could address increases in student population, including by providing transportation service, adjusting attendance area boundaries or adding portables. 	<ul style="list-style-type: none"> Impacts would be the same as Alternative 2 because the same development is proposed. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and public services would continue as under existing conditions.
3.12 UTILITIES			
Fort Lawton Site			
<ul style="list-style-type: none"> Erosion and sedimentation and pollutants from construction equipment and vehicles could impact stormwater. A temporary stormwater control system and construction Best Management Practices (BMPs) would be implemented to minimize potential impacts. Approximately 40% of the site would be covered in impervious surfaces, 15% less than under existing conditions. A permanent stormwater system would be installed. No significant stormwater impacts are expected. Sewage flows and potable water demand from/to the site would increase to approximately 41,720 gallons per day. Seattle Public Utilities (SPU) would continue to provide 	<ul style="list-style-type: none"> Impacts would be similar to Alternative 1. Approximately 45% of the site would be covered in impervious surface, 10% less than existing conditions. A permanent stormwater system would be installed. Sewage flows and potable water demand from/to the site would increase to approximately 39,550 gallons per day. 	<ul style="list-style-type: none"> Impacts would be similar to Alternative 1 Less than 30% of the site would be covered in impervious surfaces (over 20% less than existing conditions). A permanent stormwater system would be installed. There would be no additional demand for sewer service. Potable water demand is assumed to be less than under Alternatives 1 and 2, although demand would depend on 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and utilities would continue as under existing conditions.

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
sewer and water service and has adequate supply and capacity.	SPU would continue to provide sewer and water service and has adequate supply and capacity.	irrigation needs for the parks. SPU would continue to provide sewer and water service and has adequate supply and capacity.	
Talaris Site			
<ul style="list-style-type: none"> The Talaris site would not be redeveloped at this time, and utilities would remain as under existing conditions. 	<ul style="list-style-type: none"> Erosion and sedimentation and pollutants from construction equipment and vehicles could impact stormwater. A temporary stormwater control system and construction BMPs would be implemented to minimize potential impacts. Approximately 50% of the site would be covered in impervious surfaces, a 20% increase over existing conditions. A permanent stormwater system would be installed. Proposed development would increase sewage flows and potable water demand from/to the site to approximately 41,720 gallons per day. SPU would continue to provide sewer and water service and has adequate supply and capacity. 	<ul style="list-style-type: none"> Impacts would be the same as Alternative 2 because the same development is proposed. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and utilities would continue as under existing conditions.
3.13 HOUSING AND SOCIOECONOMICS			
Fort Lawton Site			
<ul style="list-style-type: none"> Residential units onsite would increase from 0 to 238 affordable units with: <ul style="list-style-type: none"> - 85 formerly homeless senior units (plus one manager unit) - 100 affordable rentals - 52 affordable homeownership units Density would increase from 0 dwelling units/acre to 7 dwelling units/acre (based on entire site area). The new housing would contribute towards meeting the City's overall housing plans and targets for affordable housing based on anticipated growth by 2035. The City's stock of approximately 27,000 existing subsidized units would increase by 0.8%. Additional housing units would increase the housing stock in the Fort Lawton vicinity by approx. 4.1%. The permanent on-site residential population would increase from 0 to approximately 596 people. The existing age, ethnicity and income levels in the Magnolia neighborhood would be expected to shift towards ratios more consistent with the city of Seattle. 	<ul style="list-style-type: none"> Residential units onsite would increase from 0 to 113 market-rate units. Density would increase from 0 dwelling units/acre to 3.3 dwelling units/acre (based on entire site area). The new housing units would contribute towards meeting the City's overall housing plans, but would not provide affordable housing to help achieve the City's affordable housing targets based on anticipated growth by 2035. Additional housing units would increase the housing stock in the Fort Lawton vicinity by approximately 2.0%, and would continue the existing prevalence of single-family homes in the site vicinity. The permanent on-site residential population would increase from 0 to approximately 565 people. Existing age, gender, income and ethnicity trends would likely continue and minimal diversification of the Magnolia neighborhood would occur. 	<ul style="list-style-type: none"> No housing would be provided under Alternative 3. Density would remain at 0 dwelling units/acre. No contributions to meeting the City's overall housing plan or affordable housing target based on anticipated growth by 2035 would occur at this location. No changes to the Magnolia Neighborhood's existing supply of housing would occur. No permanent residential population would be added to the Fort Lawton site. Population conditions on and in the site vicinity would remain similar to under existing conditions. 	<ul style="list-style-type: none"> The site would not be developed at this time, and housing, population and socioeconomic conditions would continue as under existing conditions. No new affordable housing would be provided that would help achieve the City's affordable housing targets based on anticipated growth by 2035. The site could be conveyed to the City or conveyed or sold to another entity in the future, and could be developed in accordance with the uses allowed by the site's current SR 7200 zoning.

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
<ul style="list-style-type: none"> The site would shift from being inactive to housing low-income residents with associated supportive services and a minor amount of employment. Increased spending on goods and services in the larger Magnolia neighborhood is expected from the additional affordable housing residents. 	<ul style="list-style-type: none"> No direct jobs would be supported on the site, but increased spending on goods and services in the larger Magnolia neighborhood is expected from the additional market-rate housing residents. 	<ul style="list-style-type: none"> No direct jobs would be supported on the site 	
Talaris Site			
<ul style="list-style-type: none"> The Talaris site would not be redeveloped at this time, and housing and socioeconomic conditions would continue as under existing conditions. 	<ul style="list-style-type: none"> Residential units onsite would increase from 0 to 238 affordable units with: <ul style="list-style-type: none"> - 85 formerly homeless senior units (plus one manager unit) - 100 affordable rentals - 52 affordable homeownership units Density would increase from 0 dwelling units/acre to 13.2 dwelling units/acre (based on the entire site area). The new housing would contribute towards meeting the City's overall housing plans and targets for affordable housing based on anticipated growth by 2035. Additional housing units would increase the housing stock in the Talaris vicinity by approximately 7.6%. The permanent on-site residential population would increase from 0 to approximately 596 people. The existing age, ethnicity and income levels in the Talaris vicinity are expected to shift towards ratios more consistent with the city of Seattle. The site would shift from being a conference center to housing low-income residents with associated supportive services and a minor amount of employment. Increased spending on goods and services in the larger Laurelhurst neighborhood is expected from the additional affordable housing residents. 	<ul style="list-style-type: none"> Impacts would be the same as Alternative 2 because the same development is proposed. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and housing and socioeconomic conditions would continue as under existing conditions. No new affordable housing would be provided that would help achieve the City's affordable housing targets based on anticipated growth by 2035. The site could be sold to another entity in the future, and could be developed in accordance with the uses allowed by the site's current SR 5000 zoning.
3.14 ENVIRONMENTAL JUSTICE			
Fort Lawton Site			
<ul style="list-style-type: none"> The potential for disproportionately high or adverse impacts to low-income or minority communities or persons during construction would be minimal. No significant noise or air quality impacts are expected from operation of the affordable housing and parks uses. Redevelopment would eliminate site-related health hazards associated with the older buildings onsite (remove and dispose of lead-based paint, asbestos and PCBs), and no significant noise or air quality impacts are expected during operation of the project. 	<ul style="list-style-type: none"> Similar to Alternative 1. No significant noise or air quality impacts are expected from operation of the market-rate housing. Redevelopment would eliminate site-related health hazards associated with the older buildings onsite similar to Alternative 1. 	<ul style="list-style-type: none"> Similar or less than Alternative 1. No significant noise or air quality impacts are expected from operation of the park uses. Redevelopment would eliminate site-related health hazards associated with older buildings onsite, similar to Alternative 1. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and environmental justice conditions would remain as under existing conditions. Buildings and infrastructure would likely continue to deteriorate, and hazardous materials associated with the buildings would not be removed or properly disposed of at this time. The opportunity to provide affordable housing in the Magnolia neighborhood, and the positive impacts of diversifying a neighborhood that is disproportionately occupied by higher income households, would not be realized.

Alternative 1 (Applicants Preferred Alternative)	Alternative 2	Alternative 3	Alternative 4 – No Action Alternative
<ul style="list-style-type: none">Construction and operation of affordable housing and park uses onsite is not expected to result in environmental health or safety risks to children in the site vicinity.	<ul style="list-style-type: none">Similar to Alternative 1.	<ul style="list-style-type: none">Similar to Alternative 1.	
Talaris Site			
<ul style="list-style-type: none">The Talaris site would not be redeveloped at this time, and environmental justice conditions would continue as under existing conditions.	<ul style="list-style-type: none">Similar to Alternative 1, the potential for disproportionately high or adverse impacts to low-income or minority communities or persons would be minimal.Renovation of existing buildings could eliminate site-related health hazards associated with the older buildings onsite (removal and proper disposal of lead-based paint, asbestos and PCBs), and no significant noise or air quality impacts are expected during operation of the project.Construction and operation of affordable housing onsite is not expected to result in environmental health or safety risks to children in the site vicinity.	<ul style="list-style-type: none">Impacts would be the same as Alternative 2 because the same development is proposed.	<ul style="list-style-type: none">The site would not be redeveloped at this time, and environmental justice conditions would continue as under existing conditions. The opportunity to provide affordable housing in the Laurelhurst neighborhood, and the positive impacts of diversifying a neighborhood that is disproportionately occupied by higher income households, would not be realized.

1.5 MITIGATION MEASURES AND SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The following list highlights the mitigation measures and significant unavoidable adverse impacts that would potentially result from the alternatives analyzed in this DEIS. These measures apply to Alternatives 1, 2 and 3 unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts. This list is not intended to be a substitute for the complete discussion of mitigation measures within each element that is contained in Chapter 3.

Earth

Legally-Required Measures

- During construction, contractors would employ temporary erosion and sedimentation control measures and BMPs to control erosion. These measures would be consistent with City of Seattle critical area and grading regulations.
- The foundation support systems would be determined as part of the specific design and permitting of infrastructure and individual buildings. Site-specific studies and evaluations would be conducted in accordance with SMC requirements and the provisions of the current version of the SBC.
- Proper design and construction procedures, including those in the SBC, would be followed to ensure that buildings and infrastructure could withstand a seismic event.
- A permanent stormwater management system would be designed and installed onsite, in accordance with the Seattle Stormwater Code.

Measures Proposed as Part of Project

- Site-specific analyses would be completed prior to construction to address: development on or adjacent to steep slopes areas, and to determine what structures could be influenced by excavation dewatering.
- As appropriate, pile- or pier-supported foundations would be used for structures near landslide hazard areas to reduce impacts to steep slopes.

- Any excavation shoring systems would be properly designed and constructed to address impacts from temporary construction excavations.
- Fill would be designed to control adjacent settlements and ground subsidence impacts. In addition, adjacent structures/surfaces would be monitored during construction to verify that no adverse settlement occurs.
- To limit the potential for adverse vibration impacts from pile driving on nearby structures, vibration monitoring would be conducted during installation of test piles and selected production piles.
- If appropriate, drilled piles would be used to limit the vibration and ground settlement impacts associated with driven piles.
- Ground improvement techniques or deep foundations would be employed to address the potential for liquefaction impacts at the Talaris site.

Other Possible Measures

- The potential use of properly designed retaining walls that are constructed near landslide hazard areas in accordance with City of Seattle critical area and grading regulations would reduce impacts to steep slopes.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse earth-related impacts are expected.

Biological Resources

Legally-Required Measures

- On the Fort Lawton site, any wetlands would be delineated, surveyed and rated and appropriate buffers determined per SMC 25.09.160.
- On the Talaris site, the jurisdictional status of the constructed pond and the stormwater pipe/riparian corridor would be confirmed.
- On the Talaris site, the status of the bald eagle nest would be determined.
- On the Fort Lawton site, a great blue heron *Management Plan* would be followed per DPD Directors Rule 5-2007, including:
 - Any clearing, grading or outside construction would be done outside of the nesting season (February 1st through July 31st).

- Coordination with WDFW would be provided when working near nesting habitat associated with known great blue heron breeding areas.
- Significant trees in the development areas of the sites would be identified per SMC Chapter 25.11 and tree protection/replacement measures would be implemented, as applicable.
- Development would be limited to the minimum necessary to meet project needs and mitigation sequencing would be demonstrated, as required by the City.
- Temporary and permanent stormwater control systems would be installed to limit water quality impacts on downstream resources.
- Temporary fencing at wetland buffer edges and around vegetation that provides habitat for sensitive wildlife species (i.e., bald eagle nest area at Talaris and/or forested habitat patches at Fort Lawton) would be installed during construction to protect and preserve these critical areas. Permanent fencing would be maintained at the edges of wetland buffers and at the edges of habitat areas to discourage intrusion by people and pets.
- Mitigation would be provided for any wetland impacts by implementing an approved mitigation plan, per SMC 25.09.065. Any mitigation sites would be maintained and monitored and trees would be retained/installed, as applicable.

Measures Proposed as Part of Project

- Development would be planned in areas that limit impacts to wetlands and their associated buffers and to maximize retention of trees and valuable habitat areas.
- On the Fort Lawton site, the north and south forested patches would be retained to the greatest extent possible to provide natural habitat and corridors for wildlife movement between Kiwanis Memorial Preserve Park and Discovery Park.
- The use of fertilizers, pesticides and herbicides in developed areas would be limited, consistent with the City's ongoing pesticide reduction commitments.
- Native, drought tolerant species would be planted in landscaped areas.
- Lighting would be directed away from natural areas, downcast lighting would be used and night lighting would be limited, where feasible, to limit impacts on wildlife.

Other Possible Measures

- Interpretive signs could be installed and/or information on biological resources could be distributed for public education.

Significant Unavoidable Adverse Impacts

Under Alternatives 1 and 3 at the Fort Lawton site, there could be a permanent minor displacement of certain wildlife species less tolerant of urban uses due to proposed development (e.g., from increased activity levels, use of landscape maintenance products and the introduction of pets). The past military use of the Fort Lawton site could also have impacted these species. Under Alternative 2 at the Fort Lawton site and Alternatives 2 and 3 at the Talaris site, there could be a permanent displacement of certain wildlife species less tolerant of urban uses, due to proposed development (e.g., from the elimination of habitat, as well as increased activity levels, use of landscape maintenance products and the introduction of pets). The existing conference center uses at the Talaris site also likely impact these species. No other significant unavoidable adverse biological resources impacts are anticipated.

Air Quality

Legally-Required Measures

- PSCAA regulations to minimize fugitive dust and odor during construction would be implemented.
- All development would comply with applicable air quality regulations, including NAAQS, State Ambient Air Quality standards, PSCAA's and Ecology's indoor burning regulations, PSCAA's outdoor burning regulations and State of Washington GHG laws.

Measures Proposed as Part of Project

- Construction contractors would implement air quality control plans for construction activities. A dust control plan would be prepared that would require construction crews to implement all reasonable control measures described in the *Guide to Handling Fugitive Dust from Construction Projects*.¹ Air quality control plans would include best management practices (BMPs) to control fugitive dust and odors emitted by diesel construction equipment.
- Housing developed on the Fort Lawton or Talaris sites would comply with the Evergreen Sustainable Development Standards (ESDS), which include the following GHG reduction measures:
 - Walkable neighborhoods (resulting in lower transportation-related emissions); and

¹ Associated General Contractors of Washington and Fugitive Dust Task Force 1997.

- Reductions in energy use and increased insulation (resulting in lower emissions related to space heating).
- Under Alternatives 1 and 3, sidewalks and trails would be located throughout the site that would provide opportunities for non-motorized circulation and reduce vehicular emissions.
- Under Alternatives 1 and 3, King County Metro transit bus stops would be provided at two locations along Texas Way West on the Fort Lawton site to encourage mass-transit use between the site and off-site locations and reduce the number of vehicular miles travelled.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts on air quality or GHGs are anticipated.

Noise

Legally-Required Measures

- Construction activities would be limited to between the hours of 7 AM and 10 PM during weekdays, and between the hours of 9 AM and 10 PM on weekends and legal holidays to comply with applicable state and local regulations.
- The noise associated with maintenance and amplified/unamplified human voices in the active open space under Alternatives 1 and 3 would adhere to the regulations in SMC 25.08.490.

Measures Proposed as Part of Project

- To minimize construction noise at nearby receivers, the following mitigation measures would be incorporated into construction plans and contractor specifications:
 - Locate stationary equipment away from receiving properties;
 - Erect portable noise barriers around loud stationary equipment located near sensitive receivers;
 - Turn off idling construction equipment;
 - Require contractors to rigorously maintain all equipment; and
 - Train construction crews to avoid unnecessarily loud actions (e.g., dropping bundles of rebar onto the ground or dragging steel plates across pavement) near noise-sensitive areas.
- Under Alternatives 1 and 3, existing wooded areas in the north, south, and west parts of the Fort Lawton site would be preserved in forest. Vegetation along the east edge of the Fort Lawton site would be maintained and potentially enhanced as necessary to serve as a noise buffer between the site and the adjacent Magnolia neighborhood

under these alternatives as well. Woodland and vegetated buffers would assist in reducing the impact of noise from the site on the surrounding areas.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse noise-related impacts are expected.

Environmental Health

Legally-Required Measures

- A site-specific health and safety plan would be prepared that includes the safety requirements of WAC 296-843, Hazardous Waste Operations, and WAC 296-155, Safety Standards for Construction Work to minimize the potential for workers to be exposed to hazardous materials during construction.
- Building construction/renovation would be conducted after a hazardous building materials survey has been completed to identify or confirm the presence of ACM, LBP or PCBs. Hazardous building materials would be removed or stabilized prior to demolition/renovation in accordance with applicable regulations.
- If unanticipated contamination or underground storage tanks are discovered during construction activities, the project would comply with applicable cleanup provisions based on MTCA regulations.
- Spill prevention and response planning would be conducted prior to the start of construction/renovation activities to prevent and, if needed, respond to hydraulic oil or fuel spills. A SWPPP would be developed per Ecology requirements and BMPs followed to reduce the risk of spills and discharges to the stormwater. Stormwater treatment and monitoring would be conducted during demolition and construction activities.

Measures Proposed as Part of Project

- Conventional dust control measures would be implemented to minimize the exposure of workers and the immediate surrounding populations to construction-generated dust (see Section 3.3, **Air Quality**, and **Appendix D** for details).

Other Possible Measures

- Information could be provided to inform residents about the threat to the environment from the misuse and improper disposal of household cleaners, yard fertilizers, and pesticides, and gas and other petroleum products used in the operation and maintenance of automobiles and yards.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse environmental-health related impacts are expected.

Land Use/Relationship to Plans and Policies

Legally-Required Measures

- Proposed development would adhere to all applicable City of Seattle Land Use Code requirements.
- Under Alternatives 1, 2, and 3, new landscaping would be provided on the Fort Lawton site. Under Alternative 2 and 3, existing landscaping would be preserved on the Talaris site consistent with the historic designation for the site.
- Additional mitigation measures would be provided to minimize overall impacts from construction of the site (see Section 3.1, **Earth**; Section 3.3, **Air Quality**; Section 3.4, **Noise**; and Section 3.10, **Transportation**).
- Additional mitigation measures would be provided to minimize the overall impacts from operation of the development (see Section 3.4, **Noise**; Section 3.7, **Aesthetics**; Section 3.10, **Transportation**; and Section 3.11, **Public Services**).

Measures Proposed as Part of the Project

- Proposed development would be phased over an approximately seven-year buildout period.
- Under Alternative 1 and 3, proposed development would include open space areas on the Fort Lawton site. Forested areas in the north, south, and west parts of the site would be retained and the existing vegetation along the eastern edge of the site would be preserved. As necessary, the vegetative buffer on the east edge of the site would be enhanced to provide a further buffer between the site and adjacent uses.
- Under Alternative 2 and 3, proposed development would include open space areas on the Talaris site. The natural area in the southwest part of the Talaris site would be retained and would provide a buffer between the site and adjacent uses.

Significant Unavoidable Adverse Impacts

Development under Alternatives 1 and 2 would convert the Fort Lawton site from its existing, vacant military storage and maintenance buildings to new residential uses. Development under Alternatives 1 and 3 would include active and passive parks uses on the Fort Lawton site. Development under Alternatives 2 and 3 would convert the existing conference center uses on the Talaris site to new residential uses. These conversions of

uses would result in an intensification of uses and an increase in activity levels on the sites. Proposed development would generally be consistent with applicable plans, policies, and regulations. No significant unavoidable adverse land use impacts are anticipated.

Aesthetics/Visual Resources

Legally-Required Measures

- Proposed development would adhere to all applicable City of Seattle Land Use Code requirements related to aesthetics/light and glare and would be subject to the City's design review processes.
- Under Alternatives 2 and 3, proposed development on the Talaris site would require a Certificate of Approval from the City of Seattle Department of Neighborhoods to ensure that modifications do not significantly compromise the site's landmark status, including visual character and views. The Certificate of Approval would require the review and approval by the City of Seattle's Landmark Preservation Board.
- Landscaping would be provided per the City of Seattle landscape standards.
- Pedestrian-scale lighting would be provided consistent with code, function, and safety requirements. Exterior lighting would include fixtures to direct the light downward or upward and away from off-site land uses.

Significant Unavoidable Adverse Impacts

Proposed development under the EIS Alternatives would change the visual character of the Fort Lawton or Talaris sites to new townhouses, rowhouses, and apartment buildings and open space/park facilities. No significant unavoidable adverse aesthetic/light and glare impacts are anticipated.

Recreation and Open Space

Legally-Required Measures

- A portion of the tax revenues generated directly and indirectly from development under the EIS alternatives—potentially including construction sales tax, retail sales tax, property tax, utilities tax, leasehold excise tax, and other fees from City licenses and permits during site redevelopment—would accrue to the City of Seattle and could help offset demands for public services, including parks and recreation.

Measures Proposed as Part of Project

- Up to 4.7 acres of forest land on the western edge of the Fort Lawton project site could be dedicated to Discovery Park under Alternatives 1 and 3. This area could potentially be purchased by the City of Seattle under Alternative 2 or used as private open space.
- Under Alternatives 1 and 3, passive and active recreation areas would be provided on the Fort Lawton site, including 2 or 3 multiuse fields, respectively.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts on recreation and open space are anticipated.

Historic and Cultural Resources

Legally-Required Measures

- Existing buildings that appear to meet the criteria for landmark designation and are proposed to be demolished at the Fort Lawton site shall be referred to the City's Landmark Preservation Board (LPB) for their consideration as a City Landmark. If a building is designated as City Landmark, a Certificate of Approval will be required before any changes requiring a Certificate of Approval can be made to the landmark (see **Appendix H** for details).
- Under Alternatives 2 and 3, proposed development at Talaris would be reviewed by the City Landmarks Preservation Board. Any changes to the site would comply with the designating ordinance or Controls and Incentives Agreement for the property. Proposed changes should also meet the Secretary of the Interior's Standards for Rehabilitation and Secretary of the Interior's Standards with Guidelines for the Treatment of Cultural Landscapes.
- Should any as-yet unknown potentially significant archaeological sites be encountered during construction and it is not possible to avoid them, impacts would be minimized by one or more of the following:
 - Limiting the magnitude of the proposed work;
 - Modifying proposed development through redesign or reorientation to minimize or avoid further impacts to resources; or
 - Archaeological monitoring, testing, or data recovery excavations (DAHP 2010).
- Other measures that could be implemented to minimize adverse impacts to an archaeological site include:
 - Relocating the project on the site;
 - Providing markers, plaques, or recognition of discovery;

- Imposing a delay of as much as 90 days (or more than 90 days for extraordinary circumstances) to allow archaeological artifacts and information to be analyzed; or
- Excavation and recovery of artifacts (DON 2015).
- Under Alternatives 2 and 3, an archaeological survey would be conducted prior to development at the Talaris site due to the moderate potential for subsurface archaeological sites to be present.
- If ground disturbing or other activities result in the inadvertent discovery of archaeological deposits, work would be halted in the immediate area and contact made with DAHP. Work would be halted until further investigation and appropriate consultation is concluded.
- In the unlikely event of the inadvertent discovery of human remains, work would be immediately halted in the area, the discovery covered and secured against further disturbance, and contact made with law enforcement personnel, consistent with the provisions in RCW 27.44.055 and RCW 68.60.055.

Other Possible Measures

- Under Alternative 2, an undeveloped buffer could be retained around Fort Lawton Cemetery to avoid affecting its integrity of setting through introduction of new built environment elements.
- Under Alternatives 2 and 3, interpretive information conveying the historical significance of the Talaris site could be used as public education tools or integrated into future planning and design efforts.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse historic or cultural resources impacts are anticipated.

Transportation

Legally-Required Measures

- Development would comply with all land use code requirements regardless of right of way improvements including any requirements for addition or upgrade of pedestrian facilities.
- Prior to commencing construction on either site, the selected contractor(s) would prepare a Construction Management Plan that documents the following:
 - Truck haul routes to and from the site;

- Truck staging areas (e.g. locations where empty or full dump trucks would wait or stage prior to loading or unloading);
- Construction employee parking areas;
- Road or lane closures that may be needed during utility or street construction;
- Sidewalk, bike lane, or bus stop closures and relocations; and
- Mechanism for notifying the community if street, sidewalk, bike lane, or bus stop closures would be required.

Measures Proposed as Part of Project

Fort Lawton Site

- **Improve pedestrian facilities on Texas Way** – For Alternative 1, 2 or 3, Texas Way W would be improved to add a sidewalk or walkway to the east side of the street adjacent to new development areas. In addition, the existing sidewalk on the west side of the street would be maintained. New crosswalks would be located where there is adequate sight distance for both motorists and pedestrians, and all would be designed to meet Manual on Uniform Traffic Control Devices (MUTCD) standards. Americans with Disability Act (ADA) curb ramps and landings would be provided on both sides of the street.
- **Implement parking management strategies for affordable housing uses** – To reduce the potential for overflow residential parking with Alternative 1 or 2, the Office of Housing and its partners would implement programs that reduce a resident's need to own a vehicle. The programs could include providing a shared bicycle fleet or encouraging use of bike sharing programs, encouraging use of car sharing programs, and providing information about bus service.

Talaris Site

- **Improve pedestrian facilities on internal roads** – For Alternative 2 or 3, all new or retained internal roads at the Talaris site would have a pedestrian walkway on at least on one side of the street. Any internal crosswalks would be located where there is adequate sight distance for motorists and pedestrians and all would be designed to meet MUTCD standards. ADA curb ramps and landings would be provided on both sides of the street.
- **Construct sidewalk along N 41st Street frontage** – For Alternative 2 or 3, sidewalks would be constructed along the N 41st Street site frontage where there currently are none.

Other Possible Measures

- **Share parking with athletic fields** – For Alternative 1 or 3, peak parking for the athletic fields on the Fort Lawton site is expected to occur in the evenings and on weekends. Seattle Parks and Recreation could work with the VA to share its existing nearby parking

spaces offsite during these times when parking demand at the VA facility is low or use the parking spaces at the Parks Maintenance Building onsite during these times.

Significant Unavoidable Adverse Impacts

The project would add less than one second of delay to two intersections near the Talaris site that are projected to operate at LOS F and E. This increased delay would not be considered a significant impact, as it is the long-standing precedent established by the City's traffic review team that delay increases less than 5 seconds at an intersection would not be significant. Therefore, no significant unavoidable adverse transportation-related impacts are expected.

Public Services

Legally-Required Measures

- All new buildings would be constructed in compliance with the 2015 Seattle Fire Code, which is comprised of the 2015 International Fire Code with City of Seattle amendments.
- Adequate fire flow to serve development under the EIS alternatives would be provided as required by the 2015 Fire Code and specific requirements would be adhered to regarding emergency access to structures.

Measures Proposed as Part of Project

- The portions of the site that are under construction during phased development of the site would be fenced and lit, and could be monitored by surveillance cameras to help prevent construction site theft and vandalism.
- A portion of the tax revenues directly and indirectly generated from development under the EIS alternatives—including construction sales tax, retail sales tax, property tax, utility tax and other fees, licenses and permits—would accrue to the City of Seattle and could help offset demand for public services.
- Increases in student population over the buildout period would be addressed through SPS's planning processes. SPS could take any or a combination of the following actions to match capacity and enrollment as buildout occurs under the EIS alternatives:
 - Providing transportation service to schools with capacity;
 - Adding, relocating or removing programs;
 - Adjusting school boundaries;
 - Adjusting geographic zones for option schools;
 - Adding or removing portables;
 - Adding to or renovating buildings; or,

- Opening, reconstituting or closing buildings.

Other Possible Measures

- King County Metro could provide shuttle service between the Fort Lawton Project and downtown to enhance residents' access to services and employment opportunities.

Significant Unavoidable Adverse Impacts

Alternatives 1, 2 and 3 would increase demand for school service, including at schools that are projected to be over capacity with or without the project (e.g., Lawton Elementary School in the Fort Lawton vicinity and Eckstein Middle School in the Talaris vicinity). This impact on school service would be greater under Alternatives 2 and 3 at the Talaris site, as SPS does not have plans for a new middle school in the northeast Seattle area, whereas in the service area at the Fort Lawton site there are immediate plans to add new elementary capacity, as well as new high school capacity. In general, although general growth-related pressures on schools are difficult to predict further into the future, SPS is expected to take measures to address capacity issues, including provide transportation service, adjust attendance area boundaries or add portables. As a result, no significant unavoidable adverse schools or other public services impacts are anticipated.

Utilities

Legally-Required Measures

- Construction would be conducted in accordance with the conditions of all applicable permits issued by regulatory agencies (e.g., City of Seattle, Department of Fish and Wildlife and Department of Ecology).
- A Construction Stormwater Erosion Control Plan (CSECP) would be developed and implemented to cover all areas of the contractor's work including off-site areas such as disposal sites, haul roads, all nearby property, streams and other bodies of water, including:
 - Waste materials would be transported offsite and disposed of in accordance with applicable regulations and as noted in the CSECP.
 - Construction entrances, wheel washes, street cleaning and other BMPs would be used to prevent tracking of soils beyond the project limits.
 - Stormwater from work areas would be kept separate from non-work areas.
 - The locations of existing inlets and catch basins would be identified in the CSECP and the method of protection would be described.
 - Descriptions of locations, protections and covering practices for stockpiles would be provided.
 - Controls to prevent sediment, debris and other pollutants from entering surface waters and drainage features would be provided.

Measures Proposed as Part of Project

- A Spill Plan (SP) would be developed and implemented to ensure that all pollutants and products are controlled and contained.
- BMPs for concrete work would include the following:
 - Cement trucks wash water would not be disposed of onsite but would be returned to the off-site batch plant for recycling as process water; and
 - New concrete work would be covered and protected from rainfall until cured.
- The use of unsealed external copper and galvanized metal would be prohibited except where required by Code as necessary for public safety or where no feasible alternative exists.
- BMPs would be implemented to ensure that no foreign material such as oil or fuel from construction equipment enters surface waters and that sedimentation is minimized.
- Adequate material and procedures to respond to unanticipated weather conditions or accidental release of materials would be available onsite.
- Contract documents would specify that equipment used for this project would be free of external petroleum-based products while work is performed around any water resources.
- Equipment staging or materials storage would be restricted to existing unvegetated surfaces.
- Inspections of the erosion control measures would be conducted throughout the construction period. This would ensure the effectiveness of the measures and determine any need for maintenance, repairs or additional measures.
- Disturbance would be limited to those areas necessary for construction, which would be identified in on-site plans and marked on the site before construction begins.
- Stormwater runoff from new roads, surface parking and other possible contaminant sources would be collected in on-site facilities to provide water quality treatment (Talaris Site) or flow control (Fort Lawton), as needed. These facilities could include elements such as pipes, catch basins, manholes, vaults, raingardens, bioretention facilities, dispersal trenches or underdrain systems.

Other Possible Measures

- Measures to control any impacts of excavation dewatering on groundwater could include: site-specific design and careful control of dewatering systems, minimizing the

extent and duration of dewatering, and infiltration of extracted groundwater (see **Appendix B** for details).

3.1.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse utility impacts are expected.

Housing and Socioeconomics

Increases in population and housing would occur gradually within the Fort Lawton and Talaris sites over the 7-year buildout period. No significant housing or socioeconomic impacts are expected to result from any of the redevelopment alternatives and as a result, no mitigation measures are identified.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse housing or socioeconomic impacts are expected.

Environmental Justice

Although no significant environmental justice related impacts have been identified, the following measures would minimize related impacts.

Legally-Required Measures

- All construction activities would be required to comply with city of Seattle Municipal Code regulations related to air quality and noise.
- Abatement, remediation, and disposal of any hazardous materials on site would occur in accordance with local, state, and federal regulations prior to start of construction or demolition activities on site.

Measures Proposed as Part of Project

- The areas of the site undergoing construction would be secured and non-accessible after hours to prevent the creation of an attractive nuisance that could result in safety/public health impacts to the residential populations near the site.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse environmental justice impacts are anticipated.

Chapter 2

Description of Proposed Action(s) and Alternatives

CHAPTER 2

DESCRIPTION OF PROPOSED ACTION(S) AND ALTERNATIVES

This chapter describes the Proposed Action(s) and EIS alternatives for the *Fort Lawton Army Reserve Center Redevelopment Project* (hereafter also the “Fort Lawton Project”).

Background information and a summary of historic site activities are also presented. Please see **Chapter 1** for a summary of the findings of the Draft Environmental Impact Statement (DEIS) and **Chapter 3** for details on the affected environment, probable significant environmental impacts and mitigation measures for the Proposed Action(s) and alternatives.

2.1 INTRODUCTION

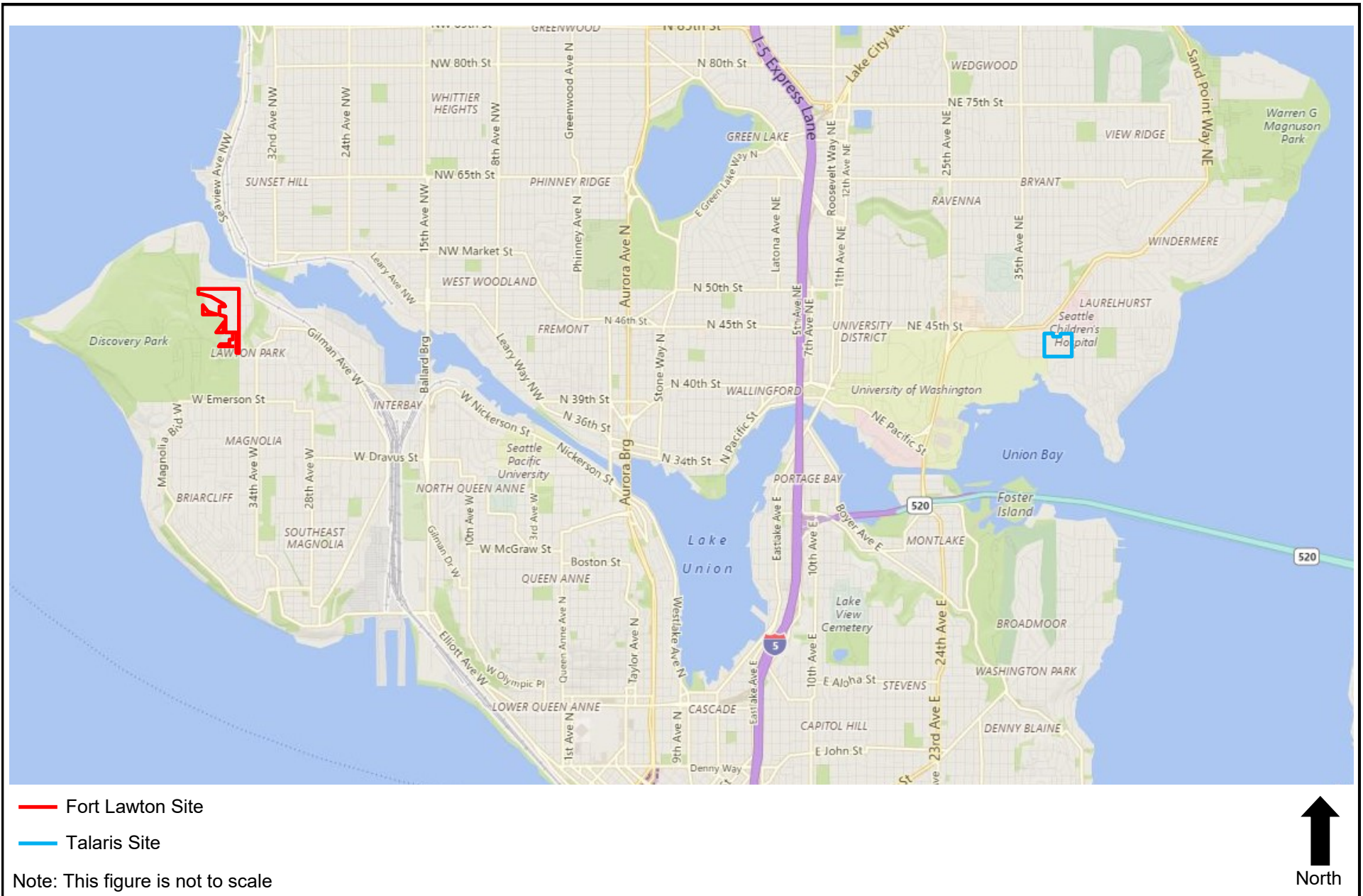
The applicant, Seattle Office of Housing (Office of Housing), is considering redevelopment options including housing and park uses for the Fort Lawton U.S. Army Reserve Center site, located in the Magnolia neighborhood in northwest Seattle (see **Figure 2-1**, Regional Map, and **Figure 2-2**, Fort Lawton Vicinity Map). The approximately 34-acre site currently contains six buildings. The City’s goals are to produce supportive housing for formerly homeless people and affordable rental and ownership housing for low-income families and individuals, as well as create public park uses (including both active and passive uses) and meet park maintenance needs. It is expected that full buildout of the Fort Lawton Project would occur by 2025. However, actual buildout could depend on specific economic and market conditions.

2.2 BACKGROUND

Fort Lawton is one of the last remaining military bases to be disposed of under the U.S. Army 2005 Base Realignment and Closure (BRAC) process. Following the decision to close the base, the Army named the City of Seattle the Local Redevelopment Authority (LRA), responsible for preparing and implementing the redevelopment plan for the property. From 2006 through 2008, the City conducted an extensive community engagement process that resulted in a detailed redevelopment plan (2008 Plan)¹ to create a diverse, mixed-income community with housing for homeless individuals and families and market-rate housing (totaling up to 216 units), while also preserving existing wildlife habitat and creating a new

¹ *Fort Lawton Army Reserve Center Redevelopment Plan* (September 2008).

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Source: SMR Architects, 2017.

Figure 2-1
Regional Map

This map illustrates the proposed alignment for the NW 36th Street Bridge in the Northwest area of Portland, Oregon. The map shows a network of streets, including major roads like Discovery Park Ave, W Commadore Way, W Lawton St, W McCord St, W Emerson St, W Rufner St, and W Fulton St. The proposed bridge alignment is highlighted in red, showing its path from the river area towards the city center. The map also includes various landmarks and features, such as the Discovery Park area and the NW 36th Street Bridge. A north arrow is located in the bottom right corner of the map.

 Project Site



Figure 2-2
Fort Lawton Vicinity Map

neighborhood park. In September 2008, the Seattle City Council passed a resolution adopting the plan and approving related applications to the federal government.² A lawsuit was subsequently filed by the Magnolia Neighborhood Planning Council. In 2009, the Court of Appeals affirmed a lower court's ruling on the applicability of the State Environmental Policy Act (SEPA) to the proposed redevelopment plan. Further changes in market conditions following the 2009 decisions led to additional delay in carrying forward further redevelopment plans.

In 2011, the U.S. Army vacated the base, leaving it in caretaker status. In 2012, the Army issued a National Environmental Policy Act (NEPA) Environmental Assessment (EA) for the closure, disposal and reuse of Fort Lawton based on the 2008 Plan.³ The 2012 EA concluded that the Proposed Action would not result in significant impacts on the environment, and the Army published a Finding of No Significant Impact (FONSI).

The City is now carrying forward its past planning efforts into a vision for the Fort Lawton Army Reserve Center that creates an affordable, livable community for people with low incomes, and takes advantage of the opportunity to increase recreational and open space. Specifically, the City envisions a mix of affordable housing including supportive housing for formerly homeless seniors, as well as affordable rental and ownership housing for low-income families and individuals. A variety of park uses would also be provided, including preservation of natural areas, development of new park spaces that could support a range of uses including active recreation and re-use of an existing structure as a park maintenance facility. The Office of Housing is leading the Fort Lawton redevelopment effort, in coordination with the Seattle Department of Parks and Recreation (SPR). The City's development partners for the affordable and formerly homeless housing include Catholic Housing Services of Western Washington and Habitat for Humanity Seattle-King County. Both groups have long, successful histories of providing quality affordable housing in the greater Seattle area.

This SEPA EIS addresses the City's current redevelopment plans and is intended to comply with previous court decisions.

² Resolution Number 31086.

³ *Final EA for BRAC 05 Recommendations for Closure, Disposal and Reuse of Fort Lawton, United States Army Reserve Center (FACID, WA030, WA031, WA012), Seattle, WA* (July 2012).

2.3 ENVIRONMENTAL REVIEW PROCESS AND PURPOSE

SEPA EIS and Lead Agency

SEPA provides the framework for agencies to consider the environmental consequences of a proposal before acting on it. It also gives agencies the ability to condition or deny a proposal due to identified likely significant adverse impacts. The Act is implemented through the SEPA Rules, Chapter 197-11 WAC and in City of Seattle by SMC 25.05 – Environmental Policies and Procedures.

The lead agency is the agency responsible for all procedural aspects of SEPA compliance (e.g., preparation and processing of an EIS). The responsible official represents the lead agency and is responsible for the documentation and content of the environmental analysis. For purposes of the Fort Lawton Project, Office of Housing is the SEPA lead agency and the Director of the Office of Housing is the responsible official for SEPA compliance.

Determination of Significance and EIS Scoping

Office of Housing determined that the project is likely to have a significant impact on the environment. Thus, an EIS is required, per RCW 43.21C.030(2)(c).

On June 5, 2017, the City issued a Determination of Significance (DS) and Request for Comments on the Scope of the EIS. The DS indicated that the 21-day EIS scoping period would end on June 26, 2017, and that a public meeting would be held during scoping to provide opportunities for the public to learn more about the Proposed Actions and to provide input on the scope of the EIS. Based on feedback from residents who wanted to attend the public meeting but had a scheduling conflict, a second public meeting was also scheduled during scoping.

The first EIS Public Scoping meeting was held on June 19, 2017. During this meeting, the public was encouraged to provide both written and/or oral comments on the scope of the EIS. A total of 232 attendees signed in at the first meeting (the actual number may have been greater because not everyone may have elected to sign in). The meeting was set up as an open house, with a formal presentation by the Office of Housing and SPR, and a continuous opportunity to provide written or oral comment throughout the meeting.

The second EIS Public Scoping meeting was held on June 21, 2017. A total of 129 attendees signed in at the second meeting. The meeting included a similar presentation and open house format as the first meeting, with public comment accepted through written forms.

During the EIS scoping comment period, a total of 715 comments were received from 676 unique commenters (some individuals provided multiple comments). In addition to public comments, the Office of Housing received a petition requesting the addition of a school

alternative. The petition contained 1,001 unique signatures at the time of submission (146 signatories also submitted a public comment). All the comment letters/emails/forms/transcript are available for review at Office of Housing (see **Appendix A** for details on the scoping process and a summary of the scoping comments).

As a result of EIS scoping, the City identified the following EIS alternatives and elements of the environment to be analyzed in the EIS.

EIS Alternatives

Three action alternatives and one no action alternative are analyzed in this EIS, including:

- **Alternative 1 (Applicant's Preferred Alternative)** – Mixed Income Affordable Housing and Public Park Uses Onsite;
- **Alternative 2** – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite;
- **Alternative 3** - Public Park Onsite; Affordable/Homeless Housing Offsite; and
- **Alternative 4** – No Action Alternative.

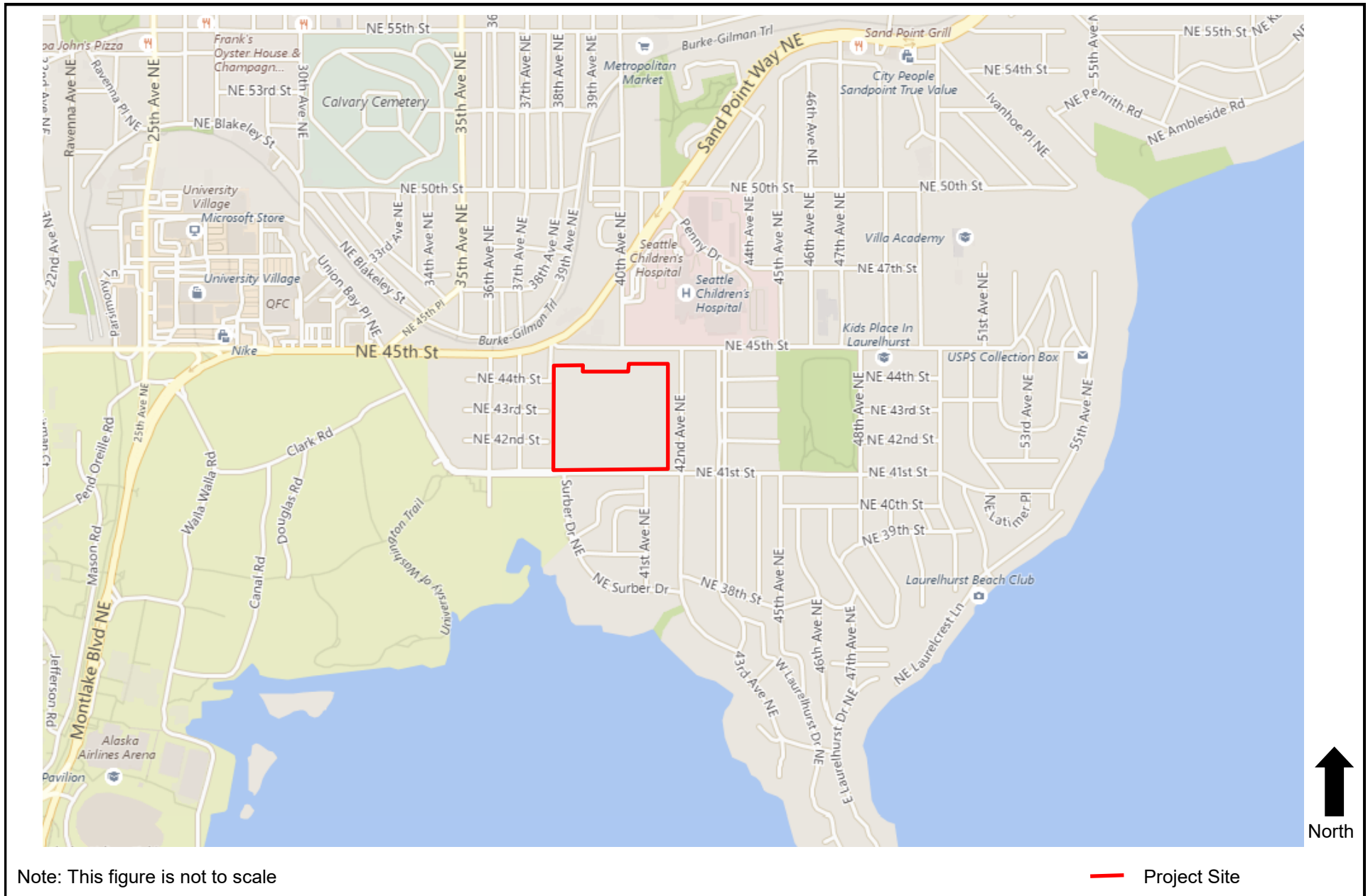
In considering potential off-site locations for Alternatives 2 and 3, Office of Housing determined that property located in the Laurelhurst neighborhood in northeast Seattle, the Talaris site, was a good candidate. The Talaris site, which was recently put on the market, is one of the few large, contiguous sites available in a residential area of Seattle that would meet the Office of Housing's objectives and the purpose and need for the project (see Section 2-7 for details). Thus, the potential off-site location for the affordable and formerly homeless housing included in this EIS under Alternatives 2 and 3 is the Talaris site (see **Figure 2-3**, Talaris Vicinity Map).

Potential redevelopment of the Talaris site is studied only as an example of a possible off-site alternative. It is provided in order to conceptually analyze probable adverse impacts that would be expected with redevelopment at that site or other off-site locations in the City. As allowed by SEPA, the analysis of the Talaris site is less detailed than the analysis of the Fort Lawton site. Additional more detailed SEPA review of the Talaris site, or another off-site location, would be required should that or another site ultimately be selected for the affordable and formerly homeless housing.

Requests to Change Proposal/Alternatives

Numerous comments were received during EIS Scoping requesting inclusion of a school on the Fort Lawton site in the range of alternatives addressed in the EIS. This would be a significant change to the underlying proposal. In response to interest from Seattle Public Schools (SPS), the Office of Housing provided additional time for SPS to evaluate the site more closely and determine whether it would be feasible to include a school in the redevelopment. After closer investigation, SPS determined that it would be unable to meet federal Department of Education requirements for a property conveyance for educational use. In particular, SPS determined that it would not meet the criteria related to financial ability and immediate need, based on its past experience applying for federal property and

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Source: Bing Maps and EA Engineering, 2017.

Figure 2-3
Talaris Vicinity Map

its review of data on projected student population. Thus, an alternative that includes a school on the Fort Lawton site is not evaluated in this EIS.

Subsequent to the scoping period, however, the SPS board passed a resolution communicating its interest in finding ways to include SPS in the redevelopment. In response, the City determined that SPS could potentially qualify for open space conveyances, and has offered SPS the opportunity to pursue ownership of a portion of the property devoted to active recreation under Alternatives 1 and 3. This option is described in Alternative 1. Should SPS pursue this option, they would need to conduct additional, separate environmental review.

During Scoping, other requests were made for revisions to the EIS alternatives, including:

- Include an off-leash dog park in the park component;
- Increase the density of affordable housing;
- Give land to the United Indians;
- Give land to the Duwamish Tribe;
- Create new athletic facilities;
- Create meeting spaces and vacation rentals; and
- Remove the off-site housing component of Alternatives 2 and 3.

(See **Appendix A** for details.)

SEPA requires that EIS alternatives meet the applicant's objectives for a project, but at a lower environmental cost (WAC 197-11-440(5)(b)). Most of the above requests do not meet the applicant's objectives for the proposal, as described in Section 2.7 (all except "create new athletic facilities" and "create meeting spaces" which are components of the alternatives identified above) and these requests are not carried forward in this EIS.

Elements of the Environment

The following elements of the environment are analyzed in the EIS. Conditions during construction and operation of the project are evaluated.

- | | |
|-------------------------------|-------------------------------|
| • Geology/Soils | • Recreation/Open Space |
| • Air Quality | • Historic/Cultural Resources |
| • Biological Resources | • Transportation |
| • Environmental Health | • Public Services |
| • Noise | • Utilities |
| • Land Use | • Housing/Socioeconomics |
| • Aesthetics/Visual Resources | • Environmental Justice |

Purpose of EIS Analysis

Per WAC 197-11-400 and SMC 25.05.400, an EIS is an objective, impartial evaluation of the environmental consequences of a proposal. It is a tool that will be used by City of Seattle, other agencies and the public in the decision-making process for the Fort Lawton Project. An EIS does not recommend for or against a course of action.

This DEIS for the Fort Lawton Project is the City of Seattle’s analysis of probable significant environmental impacts of the Proposed Actions and alternatives of the elements of the environment listed above. The DEIS has been issued and distributed to agencies, tribes, organizations and the public for review as part of a public comment period. A public meeting will be held following issuance of the DEIS to provide another forum to gather comments on the DEIS (see the **Fact Sheet** for the date, time and location of this meeting). Comments on the DEIS can be submitted in writing any time during the public comment period or presented as testimony at the DEIS public meeting.

Based on the comments received on the DEIS, a Final EIS (FEIS) will be prepared as the final step in the EIS process. The FEIS will provide responses to comments received on the DEIS from agencies, organizations and the public, and as necessary may contain clarifications on the alternatives and the analysis of environmental impacts. The DEIS and FEIS together will comprise the document that the City will use—along with other analyses and public input—to make decisions on the proposed Fort Lawton Project.

After the FEIS is issued, City staff will make recommendations to the decision-makers on the Fort Lawton Project. Additional opportunities for public input will occur during this process.

This DEIS has been prepared for the proposed Fort Lawton Project based on information that is currently available and that has been prepared specifically for this DEIS. If substantial changes occur to the project following issuance of the FEIS or new environmental information is identified, the City may determine that subsequent environmental analysis is necessary to address the project changes and/or the new environmental information.

Prior Environmental Review

As mentioned previously, NEPA environmental review was accomplished by the U.S. Army for prior actions related to the Fort Lawton Project. The *Final EA for BRAC 05 Recommendations for Closure, Disposal and Reuse of Fort Lawton, United States Army Reserve Center (FACID, WA030, WA031, WA012), Seattle, WA* (July 2012) is incorporated by reference into this EIS, per WAC 197-11-635 and SMC 25.05.635.

2.4 SITE DESCRIPTION

Fort Lawton Site

The approximately 34-acre Fort Lawton site is located in the Magnolia neighborhood in northwest Seattle. The site is bordered by W Lawton Street to the north, 36th Avenue W to the east, W Government Way to the south and Discovery Park to the west. The site is in Sections 10 and 15, Township 25 North, Range 3 East. W.M. The street address is: 4570 Texas Way W (see **Figure 2-1** and **Figure 2-2**).

Talaris Site

The approximately 18-acre Talaris site is located in the Laurelhurst neighborhood in northeast Seattle. The site is bordered by existing commercial, institutional and residential

uses along NE 45th Street to the north, residential uses along 42nd Avenue NE to the east, NE 41st Street to the south and the unimproved 38th Avenue NE right of way to the west. The site is in Section 15, Township 25 North, Range 4 East, W.M. The street address is: 4000 NE 41st Street (see **Figure 2-1** and **Figure 2-3**).

2.5 SITE HISTORY

The following provides a brief history of the Fort Lawton and Talaris sites.

General Site History

Fort Lawton Site

In 1897, the Seattle Chamber of Commerce and local citizens donated 703 acres of Magnolia Bluff to the U.S. Army for use as a base to defend Seattle and Puget Sound. Fort Lawton was in active military use as a staging center and prisoner of war camp through World Wars I and II, the Korean War and into the Vietnam War. At the height of base activities during World War II, the Fort included 450 buildings and housed 20,000 soldiers. In 1968, the Army decided to transfer much of the base site to the City of Seattle, which subsequently became Discovery Park, the City's largest park (534 acres). After the land was transferred to the City, a 20-acre portion of the site was turned over to Native Americans to create the Daybreak Star Cultural Center. An area of approximately 46 acres was retained by the U.S. Army and used as a Reserve Center. In 2000, the Army built the Fort Lawton Army Reserve Complex (FLARC) building at the Reserve Center, which was transferred to the Veterans Administration (VA) in 2011. The Federal Government plans to retain the portion of the Army Reserve Center site that contains FLARC, together with supporting parking and the military cemetery. The remaining approximately 34 acres of the Army Reserve Center, and the subject of this EIS, is currently closed and vacant and is in caretaker status by the Army.

Talaris Site

In the 1960s and 1970s, the Talaris site was developed as the Battelle Memorial Institute. The Battelle campus was used for educational seminars, conferences and workshops and as an advanced study center. In 1997, Battelle sold the property to ERA Communities of Laurelhurst, and in 2000, ERA Communities sold the property to 4000 Property, LLC. The property was leased to the Talaris Research Institute which used the facilities to study early childhood development. In 2012, Talaris Research was sold to a Maryland-based company. The property is currently used as a conference center, known as the Talaris Conference Center. In 2013, the buildings and landscaping at the Talaris site were designated as an historic landmark by City of Seattle.

(See Section 3.6, **Land Use**, and Section 3.9, **Historic and Cultural Resources**, for details on the sites' histories.)

2.6 EXISTING SITE CONDITIONS

Below is a summary of existing site topography, vegetation, land uses, vehicular/pedestrian access and utilities; as well as Comprehensive Plan designations and zoning classifications at the Fort Lawton and Talaris sites. More detailed information on existing site conditions is provided in **Chapter 3**.

Existing Natural Environment

Fort Lawton Site

The Fort Lawton site is located on Magnolia Bluff. The site generally slopes downward in a series of terraces from higher elevations at the southwest corner to lower elevations to the north and northeast. Steep slopes are present along the north and east edges of the site (see **Figure 2-4**, Existing Fort Lawton Site Conditions).

The site has two large areas of unmaintained natural vegetation: one along the north bluff and the other in the south portion of the site, adjacent to the Fort Lawton Cemetery. Other areas of the site contain grass and ornamental plants. Shilshole Bay is located about 400 feet to the north of the site. No water resources are known to be located onsite.

Table 2-1 presents a breakdown of the existing site conditions at the Fort Lawton site. As shown in **Table 2-1**, 18.5 acres (55% of the site) is currently in built area/impervious surfaces and 15.5 acres (45% of the site) is in open space areas/pervious surfaces.

Table 2-1
EXISTING BUILT AND OPEN SPACE AREA - FORT LAWTON SITE

	Existing Conditions (Ac.)
Built Area (Impervious Area)	
Buildings/Structure Footprints	2.3
Roadways/Sidewalks ¹	5.0
Surface Parking	<u>11.2</u>
Subtotal	18.5
Open Space Area (Pervious Area)	
Landscaped Areas	5.9
Passive Open Space Areas ²	9.6
Active Open Space Areas	<u>0</u>
Subtotal	15.5
TOTAL	33.9

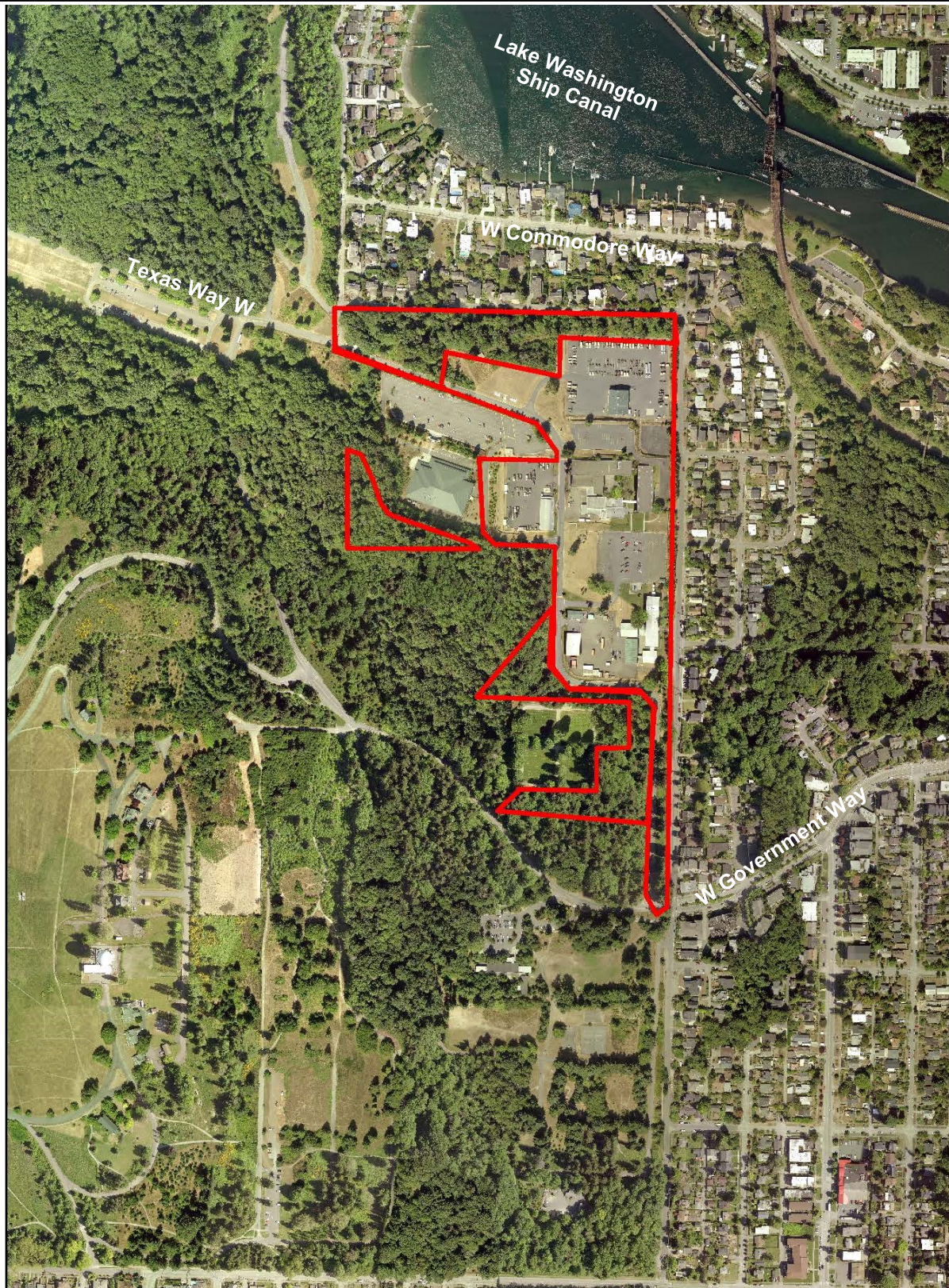
Source: Seattle Office of Housing, 2017.

¹ Includes paved area along the Texas Way W and 36th Avenue W rights of way.

² Passive open space areas under existing conditions includes natural wooded areas.

Note: any discrepancies in the table are due to rounding.

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North

Note: This figure is not to scale

— Project Site

Source: City of Seattle, 2017.

Figure 2-4
Existing Fort Lawton Site Conditions

Existing Built Environment

Fort Lawton Site

The Fort Lawton site presently contains six buildings, roadways, parking areas and sidewalks (see **Figure 2-4**). The buildings include:

- Harvey Hall - Building 216
- Leisy Hall - Building 220
- Area Maintenance Support Activity (AMSA) - Building 222
- Maintenance - Building 211
- Maintenance - Building 214
- Organizational Maintenance Shop (OMS) - Building 245

Most of the buildings were built for storage, maintenance or vehicle repair purposes. Harvey Hall – Building 216 and Leisy Hall – Building 220 contained administrative and training facilities. An incinerator stack is also present onsite. None of these structures are currently in use.

Talaris Site

The Talaris site presently contains nine buildings, together with roadways, parking areas and trails (see **Figure 2-5**). The buildings include:

- Apartment Building A
- Apartment Building B
- Apartment Building C
- Seminar Building D
- Lodge Building E
- Dining Building F
- Office Building G
- Two other minor structures

These buildings are currently used as a conference center.

Existing Site Access and Circulation

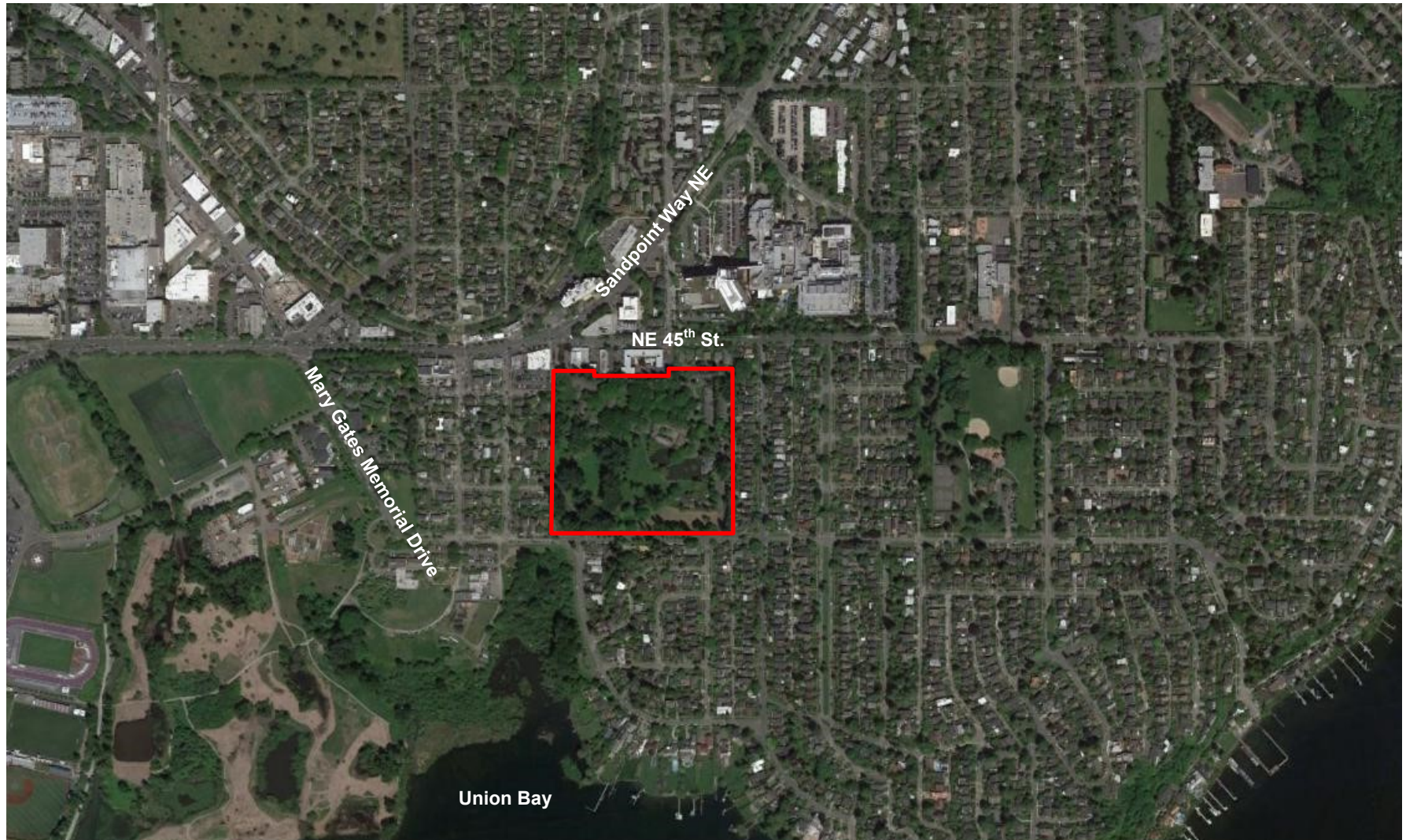
Fort Lawton Site

Vehicular access through the Fort Lawton site is presently provided by Texas Way W, a street that generally passes north-south through the site. The primary access point to the site is from the south via the intersection of Texas Way W and W Government Way. Secondary access is available from the north via the intersection of Texas Way W and 40th Avenue W. There are several former vehicular access points to the site from 36th Avenue W; however, these access locations are currently closed. Non-vehicular access within and around the site is challenged by grades, intermittent sidewalks and the fence along the site boundary.

Talaris Site

Vehicular access through the Talaris site is presently provided by private roadways. Access to the site is from the south via two access points off NE 41st Street; an existing connection from the west via 38th Avenue NE is currently closed and gated. Sidewalks onsite provide opportunities for non-vehicular access; however, fencing that has been installed around the site inhibits access by the public.

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Note: This figure is not to scale

— Project Site

North

Source: Google Earth and EA Engineering, 2017.



Figure 2-5

Existing Talaris Site Conditions

(See Section 3.10, **Transportation**, and **Appendix I** for details.)

Existing Utilities

Fort Lawton Site

Water

Existing water service to the site is provided by Seattle Public Utilities (SPU). The site is currently served by a looped underground system of water mains. These water mains enter the area at the intersection of 36th Avenue W and W Government Way. The mains supply potable water as well as fire flow. There are ten fire hydrants located throughout the site.

Sewer

Existing sewer service to the site is provided by Seattle Public Utilities (SPU). Wastewater from the site is carried north by an 8-inch sewer line that connects to a major trunk line for stormwater and wastewater in Commodore Way. Wastewater is conveyed to King County's West Point Sewage Treatment Plant, immediately west of Discovery Park, where it is treated. In addition, The King County Wastewater Treatment Division (WTD) manages a 144-inch diameter sewer tunnel located approximately 140 feet beneath the south end of the Fort Lawton site, starting where 36th Avenue W meets W Fort Street and continuing west under the site.

Stormwater

Stormwater from the site is collected by roadside swales and parking lot catch basins that drain into the City of Seattle's combined stormwater and wastewater trunk line in Commodore Way. Collected stormwater is conveyed to the West Point Wastewater Treatment Plant. There is currently no on-site stormwater flow control or water quality treatment.

Energy

Electrical power is presently provided to the site by Seattle City Light. The electrical system was installed in 1999 and consists of a 26kV primary underground system with three pulling vaults and four transformer vaults. Electrical service is provided by a Seattle City Light substation located on the east side of 36th Avenue W and associated underground transmission lines.

Natural gas service to the site is provided by Puget Sound Energy (PSE). A natural gas main is located along 36th Avenue W.

Solid Waste

Solid waste service to the site is provided by a licensed private contractor and disposed of in a permitted landfill. The U.S. Army Reserve, through a King County mandate, has a recycling program in place that collects plastic, newspaper, aluminum and glass, and sells them to Emerald Recycling services.

Talaris Site

Existing utilities on/available to the Talaris site include water (SPU), sewer (SPU), electricity (Seattle City Light), natural gas (PSE) and solid waste (SPU). Stormwater conveyance is provided onsite; however, no flow control or water quality treatment exist.

(See Section 3.12, **Utilities**, for details.)

Comprehensive Plan and Zoning Designations

Fort Lawton Site

The Fort Lawton site is designated as a Multi-Family Residential Area in the Seattle 2035 Comprehensive Plan.⁴ Multi-Family Residential Areas are intended to allow a variety of housing types and densities that are suitable for a broad array of households and income levels and that promote walking and transit use near employment concentrations, residential services and amenities. The site is zoned Single-Family 7200 (SF 7200). This zone provides for single-family housing at one dwelling unit per lot, with a minimum lot size of 7,200 sq. ft. While single-family residential uses are the primary uses allowed in this zone, other uses allowed outright by the Seattle Municipal Code include nursing homes and adult daycares.

Talaris Site

The Talaris site is designated as a Single-Family Residential Area in the Seattle 2035 Comprehensive Plan. Single-Family Residential Areas are intended to provide opportunities for detached single-family and other compatible housing options that have low height, bulk and scale in order to serve a broad array of households and incomes and to maintain an intensity of development that is appropriate for areas with limited access to services, infrastructure constraints, fragile environmental conditions or that are otherwise not conducive to more intensive development. The site is zoned Single-Family 5000 (SF 5000). This zoning classification provides for single-family housing at one dwelling unit per lot, with a minimum lot size of 5,000 sq. ft.

(See Section 3.6, **Land Use**, for details.)

⁴ Seattle, 2016

2.7 DESCRIPTION OF THE PROPOSAL

Objectives of the Proposal

SEPA requires that an EIS include a description of the applicant's objectives for a proposal (WAC 197-11-440(5) and SMC 25.05.440). The following are the applicant's (Office of Housing's) primary objectives for the Fort Lawton proposal.

- Redevelop an approximately 34-acre former U.S. Army Reserve Center site into an affordable, livable community that meets Seattle's increasing need for affordable housing, and open space and recreation areas.
- Affirmatively further fair housing by providing quality, affordable housing choices for low-income people, particularly in areas with few affordable housing options.
- Provide a mix of safe, quality and affordable housing options for people with low to no incomes, including:
 1. Approximately 85 units of permanent supportive housing for homeless seniors, including veterans;
 2. Approximately 75 to 100 units of affordable rental apartments for low-income households earning up to 60% of area median income, including families with children; and
 3. Approximately 50 units of affordable homeownership opportunities for families earning up to 80% of the area median income.
- Partner with community organizations and public agencies to support low-income households to thrive.
- Preserve existing natural areas and support wildlife habitat.
- Provide new public park amenities that serve the needs of current and future neighborhood residents, as well as the broader community.
- Help meet the high public demand for active recreation space.
- Reduce existing public maintenance costs at Discovery Park.
- Work cooperatively with the Seattle Department of Construction and Inspections to adopt necessary land use approvals, including rezoning a portion of the property to lowrise zoning.
- Ensure that the redevelopment is financially feasible and sustainable.
- Utilize this unique opportunity to leverage public property for community benefit.
- Facilitate an efficient redevelopment process to enable completion of urgently needed affordable housing as quickly as possible.

Purpose and Need for the Proposal

At this point, no federal actions or federal funding have been identified for the proposed Fort Lawton Project, and environmental review is being conducted under SEPA. However, it is possible that federal funding could be available in the future and NEPA environmental review could be required. In anticipation of such federal funding, some discussions relative to NEPA are provided in this EIS.

NEPA requires that environmental review documentation include a description of the purpose and need for a proposal (Council of Environmental Quality NEPA Implementing Regulations, Section 1502.13). The 2012 NEPA EA prepared for the Fort Lawton Army Reserve Center described the U.S. Army's purpose and need for closure, disposal and reuse of the property. The City of Seattle is now advancing a redevelopment proposal for the Fort Lawton site. In anticipation of possible federal funding, Office of Housing has identified the following purpose and need for the project.

Purpose

The purpose of this project is to create an affordable, livable community with safe, high quality housing options for those with low or no incomes, and to meet the growing demand for open space and recreational opportunities.

Need

The shortage of affordable housing in Seattle is a longstanding problem that has intensified in recent years as the city has experienced dramatic increases in housing prices from rapid economic growth. While the impacts of rising housing costs are felt broadly, those with the lowest incomes experience these effects most severely. It is estimated that over 42,000 low-income households in Seattle pay more than half their income toward housing costs, leaving few resources for other necessities such as food, medical care, transportation or child care.⁵ A severe housing cost burden puts low-income households at increased risk of becoming homeless or being displaced from their community.

The number of families and individuals living unsheltered or without a permanent home has also been on the rise. In 2016, Seattle Public Schools served 2,944 homeless students, while the number of people living on the streets in King County rose 19% to 4,505, of which 2,942 were counted in Seattle (2016 One Night Count Annual Report). In 2017, a new point in time count identified 5,485 people living without shelter and another 6,158 people living in shelters or transitional housing in King County. Over 70% of the homeless population was counted in Seattle.

Housing affordability has a clear nexus with racial and social inequity in Seattle. According to the 2017 City of Seattle Assessment of Fair Housing (AFH), Black households experience the highest rates of severe housing problems such as severe cost burden and overcrowding

⁵ U.S. Department of Housing & Urban Development, CHAS, 2010-2014 5-year American Community Survey.

(35%), followed by Hispanic/Latino and Asian households, while White households are least likely to experience housing problems. These inequities are also evident in persistent disparities in access to homeownership, which has had compounding impacts on disparities in wealth building.

In recent years, rapidly increasing home prices, has put the opportunity for buying a first home out of reach for almost all moderate-income households. The median home value in Seattle is now \$690,300,⁶ an increase of 15.5% over the past year. Zillow predicts that home prices will rise an additional 5.1% in the next 12 months. Providing affordable homeownership opportunities addresses historical inequities by allowing families, historically denied access to ownership to build wealth. In addition to building financial wealth, homeownership allows families more stability and opportunity to gain in other facets of their lives, whether it is better managing health issues, children doing better in school or having the credit to start one's own business. Presenting the opportunity to own a home near amenities such as are present in Magnolia has shown to benefit families and communities.

Patterns of racial segregation rooted in Seattle's history of racially restrictive covenants also persist. According to Seattle's 2017 AFH, 69% of the lowest poverty exposure census tracts also have a history of creating and enforcing racially restrictive covenants prohibiting one or more groups of people based on race, ethnicity or national origin from settling in that area compared with 33% of the highest poverty exposure tracts. Magnolia and Laurelhurst are among the neighborhoods that utilized restrictive covenants in the past and have remained relatively exclusive neighborhoods with little to no access to affordable housing choices for those with low incomes.

In addition to the critical need for affordable housing, the growing population in Seattle has placed extraordinary demand on the public park system and has over-burdened the limited active recreation resources available through SPR.

Between 2010 and 2016, Seattle's population increased by 78,140 individuals. Puget Sound Regional Council has projected that an additional 120,000 will move to Seattle by 2035, with most growth occurring in the city's urban centers and villages. To meet the increased demand for park space and meet the City's adopted Level of Service (LOS) of eight acres of parkland per 1,000 residents, SPR needs to acquire approximately 40 acres of parkland by 2035.

Proposed Actions

To implement the applicant's objectives for the site and satisfy the purpose and need for the project, the Proposed Actions for the Fort Lawton Project include:

- City Council approval of an updated redevelopment plan;

⁶ Zillow Home Value Index (as of August 2017).

- City Council approval of a legislative rezone of portions of the Fort Lawton site from SF 7200 to a lowrise zoning classification, and approval of any necessary amendments to Subchapter II of Chapter 23.34 to accommodate such a rezone;
- City Council authorization of public property conveyances from the U.S. Army to the City of Seattle, including acquisition and subsequent sale of parcels designated for housing development and execution of necessary easement agreements;
- Preliminary and final plat approvals;
- City Council approval of funding for acquisition and development; and
- Land use, building and construction permit approvals.

As discussed later in this chapter, not all the alternatives would require the same set of actions. For example, Alternative 2 would not require rezone of a portion of the Fort Lawton site to a lowrise zoning classification or public property conveyances, but it would require that the City Council approve an amendment to the Comprehensive Plan's Future Land Use Map and a rezone to a lowrise zoning classification for the Talaris site. The environmental impacts of the Proposed Actions are evaluated in the context of each alternative.

Redevelopment Concept

As indicated in the "Applicant's Objectives," the intent of the Fort Lawton Project is to *"Redevelop the approximately 34-acre former Fort Lawton U.S. Army Reserve Center site into an affordable, livable community that meets Seattle's increasing need for affordable housing, and open space and recreation areas."*

The Fort Lawton Project is intended to be a well-designed community that would be compatible with the surrounding Magnolia neighborhood and Discovery Park. For the most part, building development is not intended to be visible, directly interface with or connect to these areas. Specifically, the project would locate the densest building development in the central portion of the Fort Lawton site, away from site boundaries and nearby single-family residential development. The project would preserve existing forested areas in the north, west and south portions of the site, and would maintain the existing vegetation along the eastern edge of the site that serves as a buffer between the site and the adjacent neighborhood. A minimal number of vehicular and pedestrian access points would be provided (one vehicular access point to the north and one to the south) to reduce the project's interface with the surrounding area.

2.7.1 Description of EIS Redevelopment Alternatives

To conduct a comprehensive environmental review, a range of redevelopment alternatives are included in this DEIS to fulfill the applicant's objectives and purpose and need for the project, as well as provide a useful tool for the decision-making process. The EIS alternatives create an envelope of potential redevelopment for the analysis of environmental impacts under Alternatives 1, 2 and 3. These alternatives are intended to represent a reasonable range of land uses and densities to address the applicant's development objectives for the

site, the existing regulatory framework and economic factors. As the environmental review and land use approval process associated with the project proceeds, the Proposed Action chosen by the decision-makers may include components of some or all of the three alternatives. However, it is assumed that the scope of the Proposed Action that is ultimately approved will be within the range of assumptions and impacts tested in this DEIS.

Table 2-2 summarizes and compares the built and open space areas, and **Table 2-3** the proposed redevelopment under the EIS alternatives.

Redevelopment is analyzed for the year 2025 which, for SEPA purposes, is assumed to represent full buildout of the project. The actual buildout period could vary depending on specific economic and market conditions. Likewise, during future permitting, the number and type of dwelling units and/or the specific number and type of park facilities could vary and be approved so long as the impacts are within the overall project envelope analyzed in this EIS. Consequently, the summary of proposed development for Alternatives 1, 2 and 3 in **Table 2-3** is representative of the potential development; actual development may vary.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant’s Preferred Alternative)

Under Alternative 1, proposed development would feature a mix of affordable housing on the Fort Lawton site, including affordable rental and ownership and formerly homeless housing. A portion of the site would be rezoned to lowrise residential zoning. Public park uses would also be created, including active park facilities, preserved existing natural areas and conversion of an existing structure to a park maintenance facility. Proposed development is described further below and summarized in **Tables 2-2** and **2-3**.

As shown in **Table 2-2** and illustrated in **Figure 2-6A** and **2-6B**, Fort Lawton Site Plan – Alternative 1, approximately 13.2 acres (39% of Fort Lawton site) would be in built/imperious surface areas and 20.7 acres (61% of the site) would be in open space/pervious surface areas under Alternative 1.

A total of approximately 202,291 sq. ft. of residential uses (238 units), 21.6 acres of parks and recreation facilities and 266 parking spaces would be provided on the Fort Lawton site. Alternative 1 is anticipated to accommodate approximately 596 new residents.⁷

⁷ Population estimates are based on comparable projects and are calculated as follow:

- Senior Supportive housing – 85 residents (1.0 resident per unit) and 1 manager (1.0 manager per manager unit);
- Affordable rental – 250 residents (2.5 residents per unit); and
- Affordable ownership – 310 residents (5.0 residents per unit).

Table 2-2
BUILT AND OPEN SPACE AREA ON THE FORT LAWTON SITE –
EIS ALTERNATIVES

	Alt. 1 (Ac.)	Alt. 2 (Ac.)	Alt. 3 (Ac.)	Alt. 4 (Ac.)
Built Area (Impervious Area)				
Buildings/Structure Footprints	2.2	7.1	0.2	2.3
Roadways/Sidewalks ¹	6.6	6.9	5.0	5.0
Surface Parking	4.4	0.0	4.2	11.2
Private Drive Paths	<u>0.0</u>	<u>1.3</u>	<u>0.0</u>	<u>0.0</u>
Subtotal	13.2	15.3	9.4	18.5
Open Space Area (Pervious Area)				
Landscaped Areas	2.6	12.7	0.0	5.9
Passive Open Space Areas ²	13.0	0.0	17.0	9.6
Active Open Space Areas ³	5.1	0.0	7.6	0.0
Undesignated Buffer Space	<u>0.0</u>	<u>5.9</u>	<u>0.0</u>	<u>0.0</u>
Subtotal	20.7	18.6	24.6	15.5
TOTAL	33.9	33.9	33.9	33.9

Source: Seattle Office of Housing, 2017.

¹ Includes paved area along the Texas Way W and 36th Avenue W rights of way.

² Passive open space areas under Alternatives 1 and 3 includes natural wooded areas and passive parks. Passive open space areas under Alternative 2 include natural wooded areas.

³ Active open space areas under Alternatives 1 and 3 include multi-purpose fields.

Note: any discrepancies in the table are due to rounding.

Table 2-3
SUMMARY OF DEVELOPMENT – EIS ALTERNATIVES

	ALT. 1		ALT. 2		ALT. 3		ALT. 4	
	F.L. SITE	T. SITE	F.L. SITE	T. SITE	F.L. SITE	T. SITE	F.L. SITE	T. SITE
HOUSING								
Number of Housing Units	238	0	113	238 ²	0	238 ²	0	0
Area of Housing (SF)	202,291	0	316,400	256,551	0	256,551	0	0
PARKS & RECREATION								
Number of Sports Fields	2	0	0	0	3	0	0	0
Area of Parks & Recreation (Ac) ¹	21.6	0	0	0	29.0	0	0	0
COMMUNITY FACILITIES								
Area of Community Facilities (SF)	0	0	0	30,621	0	30,621	0	0
PARKING								
Number of Parking Spaces	266	0	254	295	90	295	0	0
Area of Surface Parking (Ac)	4.4	0	0	3.3	4.2	3.3	0	0

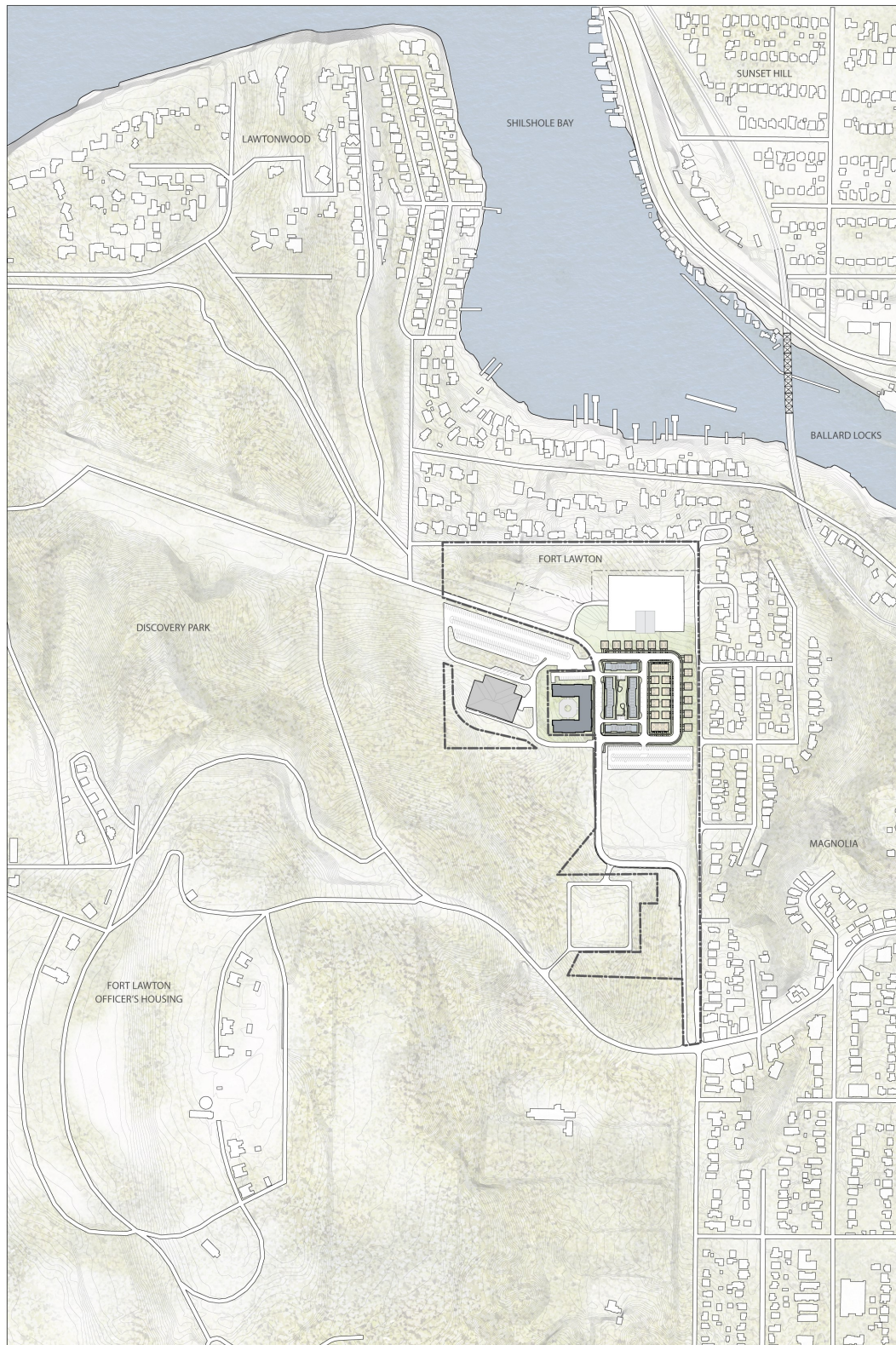
Source: Seattle Office of Housing, 2017.

F.L. = Fort Lawton, T. = Talaris

¹ Includes active and passive parks, SPR maintenance facility and area dedicated to Discovery Park.

² For purposes of conservative analysis in this EIS, the same number of affordable and formerly homeless housing units are assumed on the Talaris site under Alternatives 2 and 3 as on the Fort Lawton site under Alternative 1.

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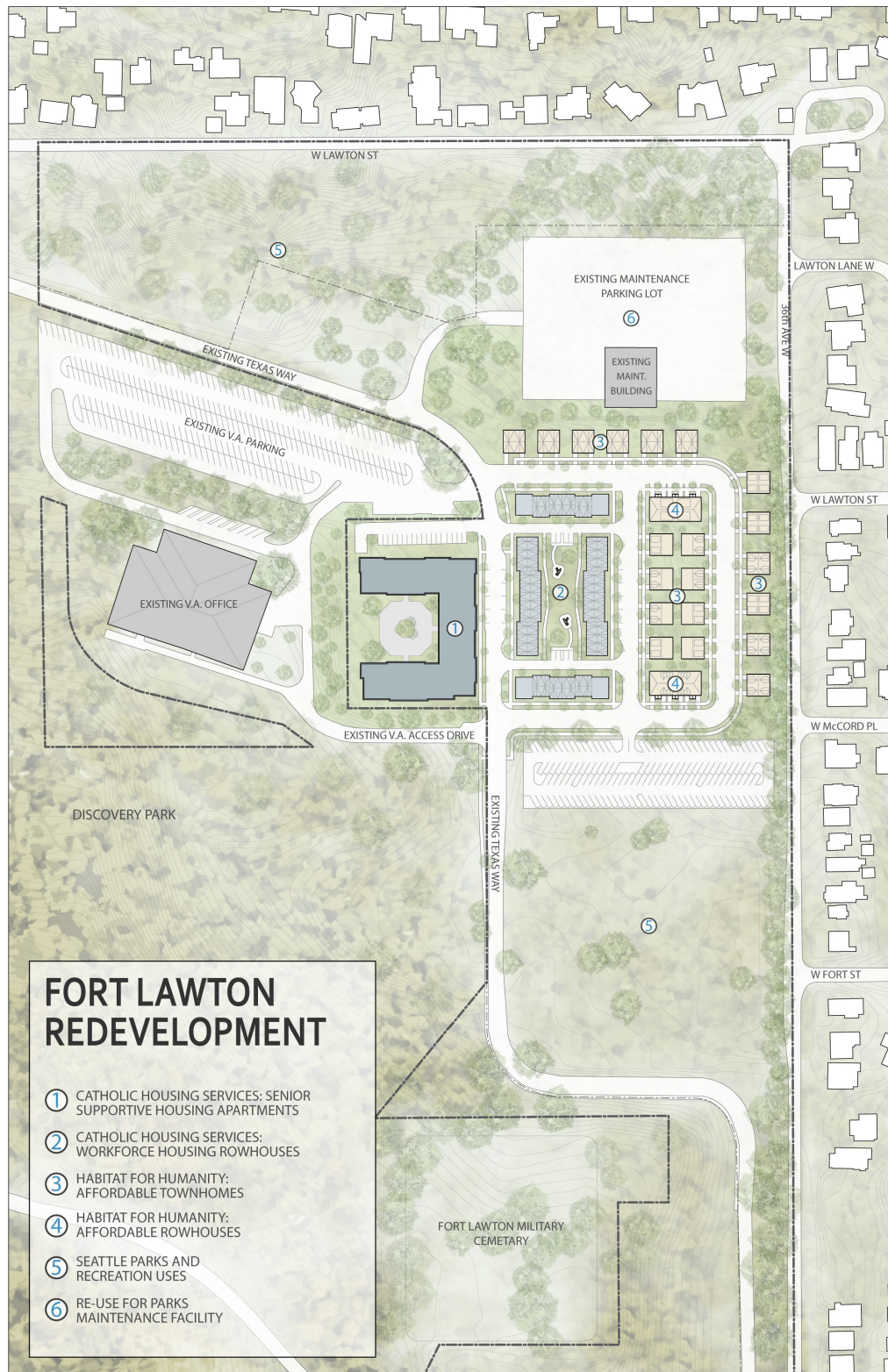


North

Note: This figure is not to scale

Source: SMR Architects, 2017.

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Note: This figure is not to scale

Source: SMR Architects, 2017.

Figure 2-6B
Fort Lawton Site Plan—Alternative 1

Conveyance/Sale of Property

Development of the Fort Lawton site under Alternative 1 would require public property conveyances by the U.S. Army to the City of Seattle per the BRAC process. Conveyances would include acquisitions and subsequent sale of parcels designated for housing development and the execution of necessary easement agreements.

Zoning Reclassification

The proposal would require that a portion of the site be rezoned from the existing SF 7200 zoning to a lowrise zoning classification (e.g., Lowrise 3) to develop the housing. (Note: the City is currently considering legislation to amend development standards for all lowrise zones; depending on what is adopted, the proposed redevelopment may be consistent with new Lowrise 1 or Lowrise 2 standards). The rezone could be accomplished through a legislative rezone process. For the rezone, a rezone proposal would need to be prepared, review of the proposal conducted and City Council approval granted. In addition, the City Council would need to enact any necessary amendments to Subchapter II of Chapter 23.34 to accommodate such a rezone.

Phasing Plan

The proposal would be approved and constructed over an estimated seven years. Construction of the project would begin after property conveyance, zoning reclassification and other approvals, likely in 2020. For analysis purposes in this EIS, buildout of the project is estimated to occur in 2025. Actual buildout would depend on specific economic and market conditions. (See **Table 2-4** for details.)

Demolition and Grading

Under Alternative 1, all the buildings on the Fort Lawton site, except OMS - Building 245, would be demolished and removed. OMS Building 245 would be preserved as a maintenance facility for SPR. Site grading for the residential and parks and recreation uses and associated infrastructure at the Fort Lawton site would occur during initial site preparation and during all subsequent phases of site redevelopment. As much as possible, buildings, fields and infrastructure would be designed to conform to the existing site topography and minimal grading would occur.

Table 2-4
PHASING SCHEDULE – ALTERNATIVE 1

Year	Activity
Year 1 (2018)	Property conveyance and zoning reclassification approval
Year 2 (2019)	Permit intake, design development
Year 3 (2020)	MUP/building permit approval, begin demolition, grading and construction of infrastructure
Year 4 (2021)	Complete infrastructure, begin construction of affordable rental housing and phase 1 of affordable for-sale housing
Year 5 (2022)	Complete affordable rental housing, begin phase 2 of affordable for-sale housing
Year 6 (2023)	Complete phase 2 of affordable for-sale housing, begin phase 3 of affordable for-sale housing, begin development of active park facility
Year 7 (2024)	Complete phase 3 of affordable for-sale housing, complete active park facility

Source: Seattle Office of Housing, 2017.

Proposed Development

Housing

Alternative 1 would include approximately 238 housing units on the Fort Lawton site. A mix of affordable housing would be provided, including:

- **Senior Supportive Housing** – Subsidized rental housing for senior citizens (55 years of age and older), including veterans, who were formerly homeless and have income at or below 30% of the area median income (AMI);⁸
- **Affordable Homeownership** – Housing available for sale to households with an income at or below 80% of the AMI; and
- **Affordable Rental** – Housing available for rent to households with an income at or below 60% of the AMI.

Table 2-5 provides a breakdown of the housing units and **Table 2-6** provides the area of housing by housing type under Alternative 1.

⁸ Per the U.S. Department of Housing and Urban Development's FY 2017 Income Limits Documentation System, the 2017 AMI for a family of four in the Seattle-Bellevue area is \$96,000.

**Table 2-5
NUMBER OF HOUSING UNITS – ALTERNATIVE 1**

	ALT. 1	
	F.L. SITE	T. SITE
Senior Supportive Apts. (Formerly Homeless Rental)	86 ¹	0
Affordable Rental	100	0
Affordable Ownership (Townhouses)	40	0
Affordable Ownership (Rowhouses)	12	0
TOTAL	238	0

Source: Seattle Office of Housing, 2017.

1. Includes 85 senior units and one manager unit

F.L. = Fort Lawton, T. = Talaris

**Table 2-6
AREA OF HOUSING – ALTERNATIVE 1**

	ALT. 1	
	F.L. SITE	T. SITE
Senior Supportive Apts. (Formerly Homeless Rental)	89,625	0
Affordable Rental (Rowhouses)	51,940	0
Affordable Ownership (Townhouses)	41,060	0
Affordable Ownership (Rowhouses)	19,666	0
TOTAL	202,291	0

Source: Seattle Office of Housing, 2017.

F.L. = Fort Lawton, T. = Talaris

Open Space and Recreation Areas

Under Alternative 1, a large portion of the Fort Lawton site (61%) would be in open space, including: passive open space, active open space and landscaped areas (see **Table 2-2**).

These areas would be available for use by project residents as well as the public.

Passive Open Space Areas

A total of 13.0 acres of the site would be provided for passive recreation activities such as picnicking and viewing (see **Table 2-2**). Existing wooded areas in the north and south parts of the site would be preserved in their natural condition. A large passive park would be provided in the north part of the site and a small passive park would be created in the central site area, amongst the townhouses and row houses. The smaller park could include a children's play area(s). Up to 4.7 acres of forest land owned by the U.S. Army in the west portion of the site could be dedicated to Discovery Park. All park facilities would be designed and constructed to SPR standards, and would be owned and maintained by SPR.

Active Open Space Areas

A total of 5.1 acres of the site would be developed for active recreation activities (see **Table 2-2**). Counting associated parking and site improvements, the total area devoted to active recreation would be approximately six acres. Two unlit, multi-purpose fields would be provided in the central portion of the site, to the south of the housing and parking. These

fields could be configured in a variety of orientations for different uses, including for both structured and unstructured athletics and community functions. It is anticipated that some league play would occur on these fields. The fields would require electricity to maintain the fields. All fields would be designed and constructed per SPR standards, and would be owned and maintained by SPR.

Ownership of Active Open Space Areas

The City has begun discussion with Seattle Public Schools (SPS) regarding their interest in owning and maintaining land dedicated to active recreation under Alternative 1. Such uses could help meet SPS's recreational needs, as well as serving the broader public. As with other shared facilities in Seattle, these would likely be the subject of a Joint Use of Facilities Agreement with SPR.

Pedestrian Facilities

Sidewalks and trails would be located throughout the site to provide opportunities for non-motorized circulation. Texas Way W would be improved to add a sidewalk or walkway on the east side of the street adjacent to new development areas. In addition, the existing sidewalk on the west side of the street would be maintained. Trails would be provided between the rowhousing in the central portion of the site and potentially in other portions of the site as well. No direct sidewalk/trail connections are assumed to the Magnolia neighborhood to the east or Discovery Park to the west (see **Figure 2-7**, Fort Lawton Circulation Plan – Alternative 1, and **Figure 2-8** – Fort Lawton Typical Road Sections – Alternative 1).

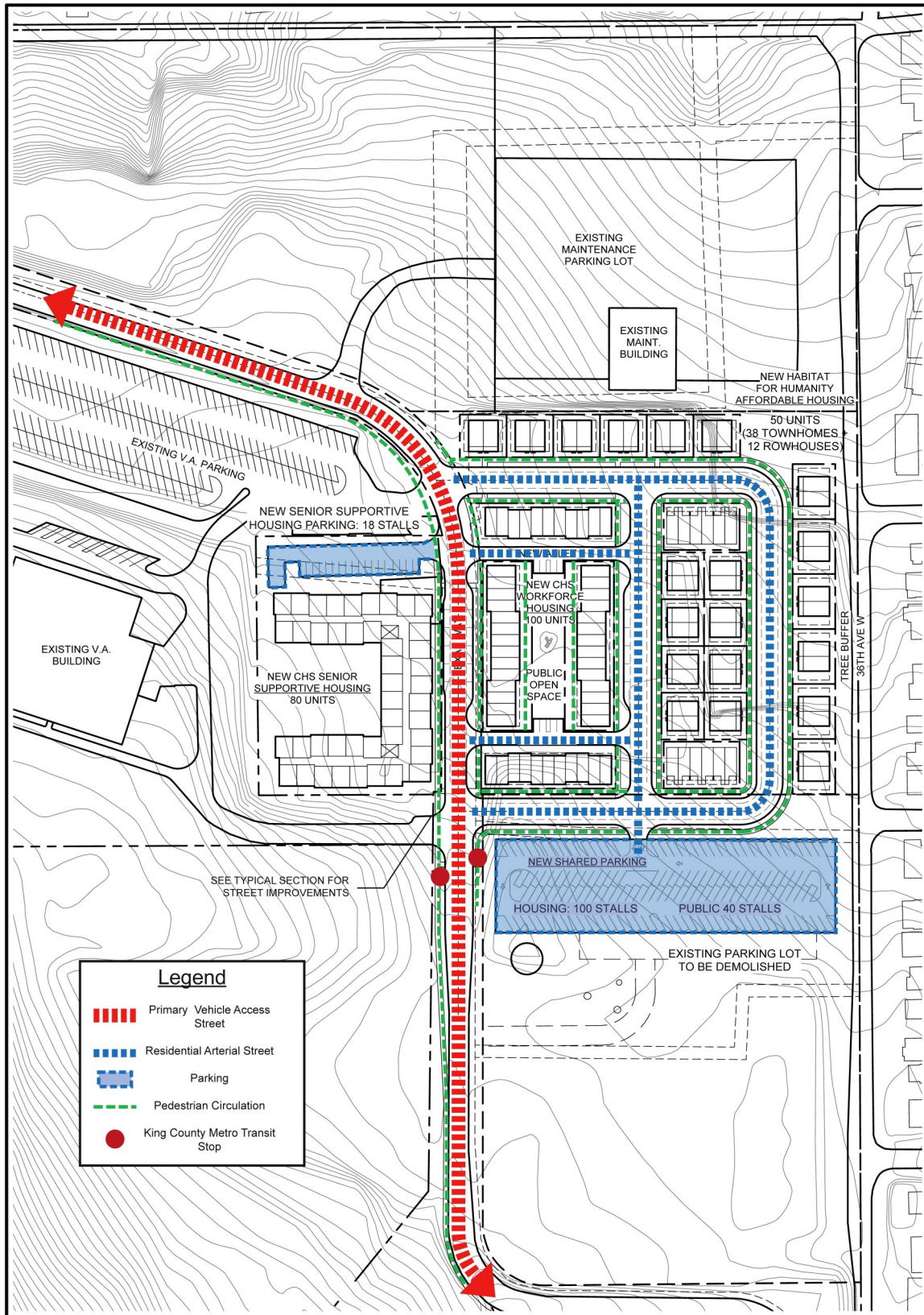
Maintenance Building

Existing OMS - Building 245 and the associated surface parking area and driveways in the north part of the Fort Lawton site would be retained under Alternative 1. These facilities would be used for parks maintenance purposes by SPR. No new infrastructure would be required for the building. Controlled access to the maintenance building parking area would be available from a driveway off of Texas Way.

Landscaping

Landscaping on the Fort Lawton site under Alternative 1 would blend with the existing natural vegetation in Discovery Park and the landscaping in the Magnolia neighborhood, and would meet applicable City of Seattle landscape regulations. The landscape concept for the parks and recreation component of the project would feature preserving wooded areas (e.g., in the north and south portions of the site), retaining passive use lawn areas and developing active playfields. The project would maintain and, if necessary, enhance the existing vegetation along the east edge of the site that serves as a buffer between the site and the Magnolia neighborhood. Exceptional trees in development areas onsite would be retained where possible. If any exceptional trees need to be removed, City of Seattle's

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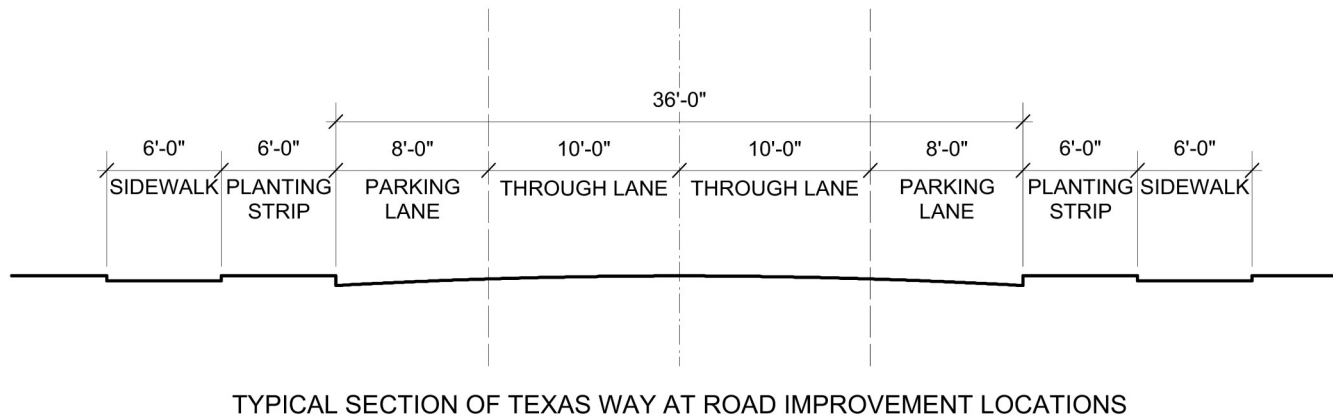
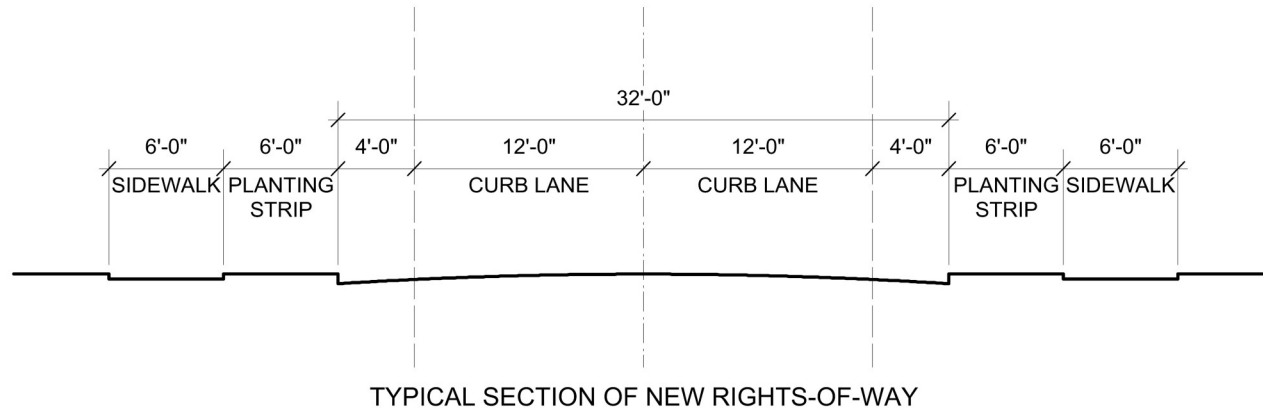


Note: This figure is not to scale

Source: SMR Architects, 2017.

Figure 2-7
Fort Lawton Circulation Plan—Alternative 1

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Source: SMR Architects, 2017.

Figure 2-8

mitigation requirements would be met (per SMC Chapter 25.11). Landscaping would incorporate native, noninvasive and drought-resistant plantings.

Access/Parking/Transit

Access

Under Alternative 1, the primary access point to the site would continue to be from the south via the intersection of Texas Way W and W Government Way. Access would also continue to be available from the north via the intersection of Texas Way W and 40th Avenue W (see **Figure 2-7**).

Texas Way W would be maintained in its current configuration and continue to serve as the main access route through the site. This street would be improved to include:

- Two 10-foot wide travel lanes;
- 8-foot wide parking lanes (on both sides of roadway);
- 6-foot wide planting strips (on both sides of the roadway, adjacent to development areas); and
- 6-foot wide sidewalks (on both sides of roadway, adjacent to development areas).

Other new residential streets would be developed onsite to serve development. These streets would include:

- Two 12-foot wide travel lanes;
- 4-foot wide shoulders (on both sides of roadway);
- 6-foot wide planting strips (on both sides of roadway); and
- 6-foot wide sidewalks (on both sides of roadway).

(See **Figure 2-8**.)

Parking

A total of 266 parking spaces would be provided on the Fort Lawton site for development under Alternative 1. Of these, 206 spaces would be for the housing and 60 spaces for the parks and sports fields (see **Table 2-7** for a breakdown of the parking spaces by use under Alternative 1). Most of the parking spaces would be located in paved surface parking lots (226 spaces); parking for the townhouses would be located within the buildings (40 spaces).

Parking under Alternative 1 would meet the requirements in the Seattle Municipal Code (SMC 23.54.015).

Table 2-7
PARKING SPACES BREAKDOWN – ALTERNATIVE 1

	Alt. 1	
	F.L. Site	T. Site
HOUSING		
Senior Supportive Apts. (Formerly Homeless)	18	0
Workforce Apts. (Affordable Rental)	112	0
Townhouses (Affordable for Sale)	40	0
Rowhouses (Affordable for Sale)	12	0
New On-Street Parking	<u>24</u>	<u>0</u>
Subtotal	206	0
PARKS & RECREATION		
Parks/Sports Fields	<u>60</u>	<u>0</u>
TOTAL	266	0

Source: Seattle Office of Housing, 2017.

F.L. = Fort Lawton, T. = Talaris

Transit

King County Metro transit bus stops would be provided at two locations along Texas Way W onsite: on either side of the roadway adjacent to the large shared parking area (see **Figure 2-7**).

Utilities

Alternative 1 would require new water, sewer, stormwater, electrical and solid waste service for development. SPU would continue to provide water and sewer service, Seattle City Light electrical service, PSE natural gas service and a licensed private contractor solid waste service to the site. Necessary utility extensions would be made to serve development. A temporary stormwater control system would be installed for construction and a permanent stormwater control system for operation of the project, per City of Seattle standards (see Section 3.12, **Utilities**, for details).

Project Design

A cohesive design concept would be generated for the development under Alternative 1 that would meet overall citywide design guidelines and City design review requirements.

Housing

The housing would feature four building types, as described below.

Senior Supportive Housing

The senior supportive housing would consist of one three-story, u-shaped building located in the west central portion of the site, to the west of Texas Way W (see **Figure 2-6B**). The building would be developed by Catholic Housing Services and would feature:

- Maximum building height: up to 40 ft.;
- Density: 177 units allowed/85 units provided (plus one manager unit);
- Bedrooms: two floors of studio units over a base level of supportive services; and

- Open Space: courtyard to the west of the building.

Affordable Rental Housing

Affordable rental apartments would be provided in four, three-story rowhouse blocks located in the central portion of the site (see **Figure 2-6B**). The buildings would also be developed by Catholic Housing Services and would feature:

- Maximum building height: 30 ft. + 10 ft. (pitched roof allowance);
- Density: 31 units allowed/28 units provided;
- Bedrooms: One-, two- and three-bedroom units; and
- Open Space: courtyard surrounded by rowhouses.

Affordable Homeownership Rowhouses

Rowhouses would be provided in two, three-story six plex buildings in the central portion of the site (see **Figure 2-6B**). The buildings would be developed by Habitat for Humanity and would feature:

- Maximum building height: 30 ft. + 10 ft. (pitched roof allowance);
- Density per site: no limit/6 units per site provided; and
- Bedrooms: three-bedroom units.

Affordable Homeownership Townhouses

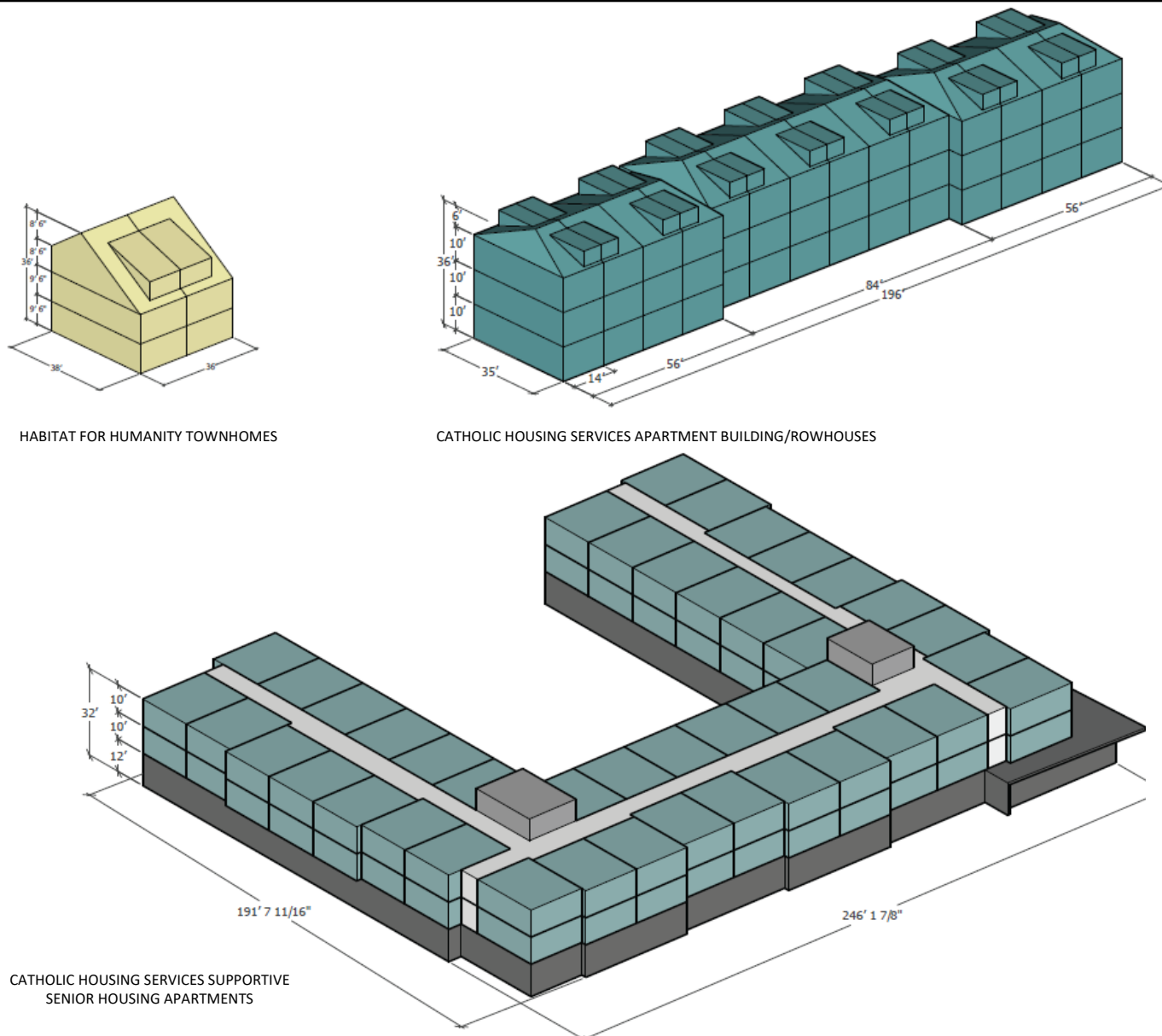
Townhouses would be provided in 20, three-story duplex buildings located in the central and east portions of the site (see **Figure 2-6B**). The buildings would be also be developed by Habitat for Humanity and would feature:

- Maximum building height: 30 ft. + 10 ft. (pitched roof allowance);
- Density: 2 units per site allowed/2 units per site provided; and
- Bedrooms: three-bedroom units.

(See **Figure 2-9**, Massing Diagrams.)

Exterior building materials for all the new buildings could include: fiber cement panel and lap siding, as well as wood framing and trim. Design inspiration for the project would be taken from the Officer Row housing that historically occupied the site.

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Note: This figure is not to scale

Source: SMR Architects, 2017.

Parks

The active and passive park areas would meet SPR standards for park development. The parks would be designed in more detail in the future through a planning and public outreach process, and would be constructed when funding is available.

Supportive Services, Facilities and Resident Associations

Under Alternative 1, supportive services would be provided for the formerly homeless senior residents, and community facilities and organization would be provided for the residents of the affordable rental and ownership housing on the Fort Lawton site as described below.

Senior Supportive Housing

The senior supportive housing would have a comprehensive package of services focused on residential stability. First, case management services would be provided onsite by Catholic Community Services of Western Washington (CHS' sister organization). These Housing Case Managers would meet with residents to identify their supportive service needs, provide case management services, crisis intervention, eviction prevention, advocacy and linkages to community resources, and encourage participation in meaningful activities. Residents would be assisted in obtaining and maintaining financial disability benefits such as Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI) and VA benefits, and would be assisted with obtaining Medicaid, Medicare and other medical benefits. Case managers would also leverage outside behavioral health services, including chemical dependency treatment and/or mental health services, and bring providers onsite whenever possible. Residents needing additional help with personal care and unit up-keep would be referred for chore service. Health care would be a primary need of residents at the Fort Lawton Homeless Senior Housing. Residents would be referred, transported and accompanied when necessary to community health clinics. Primary care physicians and/or visiting nurses may use a private room available in the building to serve residents. This approach would encourage residents to develop a plan of action to address their physical and mental health care needs. The goal of services is for residents to obtain and maintain financial and medical benefits, decrease the use of emergency medical services, establish a relationship with a primary health care provider and increase a resident's ability to abide by lease requirements despite a disabling condition.

In addition to case management services, all residents would have access 24 hours a day to residential counselors. Residential Counselors would actively engage residents in on-site recreational and social activities which could include creating opportunities for resident involvement in internal and external neighborhood volunteer activities. Residents would be assisted in the formation of interest groups or therapeutic support groups which may be facilitated when appropriate. Residential Counselors would collaborate with property management, case managers and other outside service providers to ensure coordination of services to residents. Housing stability plans would be developed in collaboration with residents, case managers and other staff, outlining goals and strategies to ensure housing success. Contact would be maintained with case managers to resolve crises and monitor

progress as defined in the housing stability plan, and ensure the adequate provision of identified services.

Affordable Rental Housing

A versatile community space for tenants would be an integral part of the design of the affordable rental housing, as tenant enrichment and empowerment is vital to Office of Housing's vision for Fort Lawton. The community space would house a meeting room with a small kitchenette and on-site management offices. The meeting space would be available for the tenants to come together socially and to facilitate tenant-based empowerment activities such as a resident's council, home ownership classes, visiting medical services and similar activities. Catholic Housing Services would encourage the establishment of a resident's council to solicit input from tenants and cultivate an active community. If possible, a computer lab would also be housed in the community space, providing tenants an opportunity to learn, or improve, the computer skills necessary to participate in our technological world. Catholic Housing Services has a long history of coordinating support services and connecting residents with community-based resources, and with office space available in the community space they hope to bring those resources to the residents of Fort Lawton affordable housing.

Affordable Ownership Housing

The affordable ownership housing would utilize a land trust model that involves a community association comprised of the Habitat homeowners. This model typically includes requirements for homeowners to participate in the governance of their own community by serving on the board of the association. Community members would be involved in the establishment and enforcement of the rules and regulations impacting their own homes and their own community. The association would be required to have professional management and the ground lease would provide for oversight by Habitat. This would provide the support and guidance to the community members and insure the Association is properly managed and property standards are maintained.

Sustainability

Under Alternative 1, sustainable design principles for the Fort Lawton Project would include:

- optimize site potential;
- minimize non-renewable energy consumption;
- use environmentally preferable products;
- protect and conserve water;
- enhance indoor environmental quality; and
- optimize operational and maintenance practices.

Housing developed on the Fort Lawton site would adhere to the Evergreen Sustainable Development Standards (ESDS). These standards include: maximizing density; providing: access to open space, walkable neighborhoods, water conserving fixtures, reductions in

energy use and increased insulation; and use of low Volatile Organic Compound (VOC) materials.

The project stormwater management system could include retention basins and rain gardens. The landscape design would include native drought resistant plants to reduce water usage.

Alternative 2 – Market-Rate Housing Onsite; Affordable and Homeless Housing Offsite

Under Alternative 2, development of market-rate single-family housing under current zoning is proposed on the Fort Lawton site, and construction of affordable and formerly homeless housing is proposed on the Talaris site.

As shown in **Table 2-2**, approximately 15.3 acres (45% of the Fort Lawton site) would be covered in built/impervious surface areas and 18.6 acres (55% of the site) would be in open space/pervious surface areas with proposed development under Alternative 2. Approximately 50% of the Talaris site would be covered in built/impervious surfaces and 50% in open space/pervious surfaces.

Alternative 2 would include 316,400 sq. ft. of residential uses (113 units) and 254 parking spaces on the Fort Lawton site, and approximately 256,551 sq. ft. of residential uses (up to 238 units), approximately 30,621 sq. ft. of community facilities and 295 parking spaces on the Talaris site. The project would not provide any active or passive public parks. These figures are rough estimates based on areas that would likely be targeted for development; actual buildout would be further refined based on variables such as avoidance of steep slope areas and potential clustering of homes (see **Figure 2-10** – Fort Lawton Site Plan – Alternative 2 and **Figure 2-11** – Talaris Site Plan, Alternatives 2 and 3).

Alternative 2 is anticipated to accommodate a total of approximately 849 residents (263 on the Fort Lawton site⁹ and 596 residents on the Talaris site)..

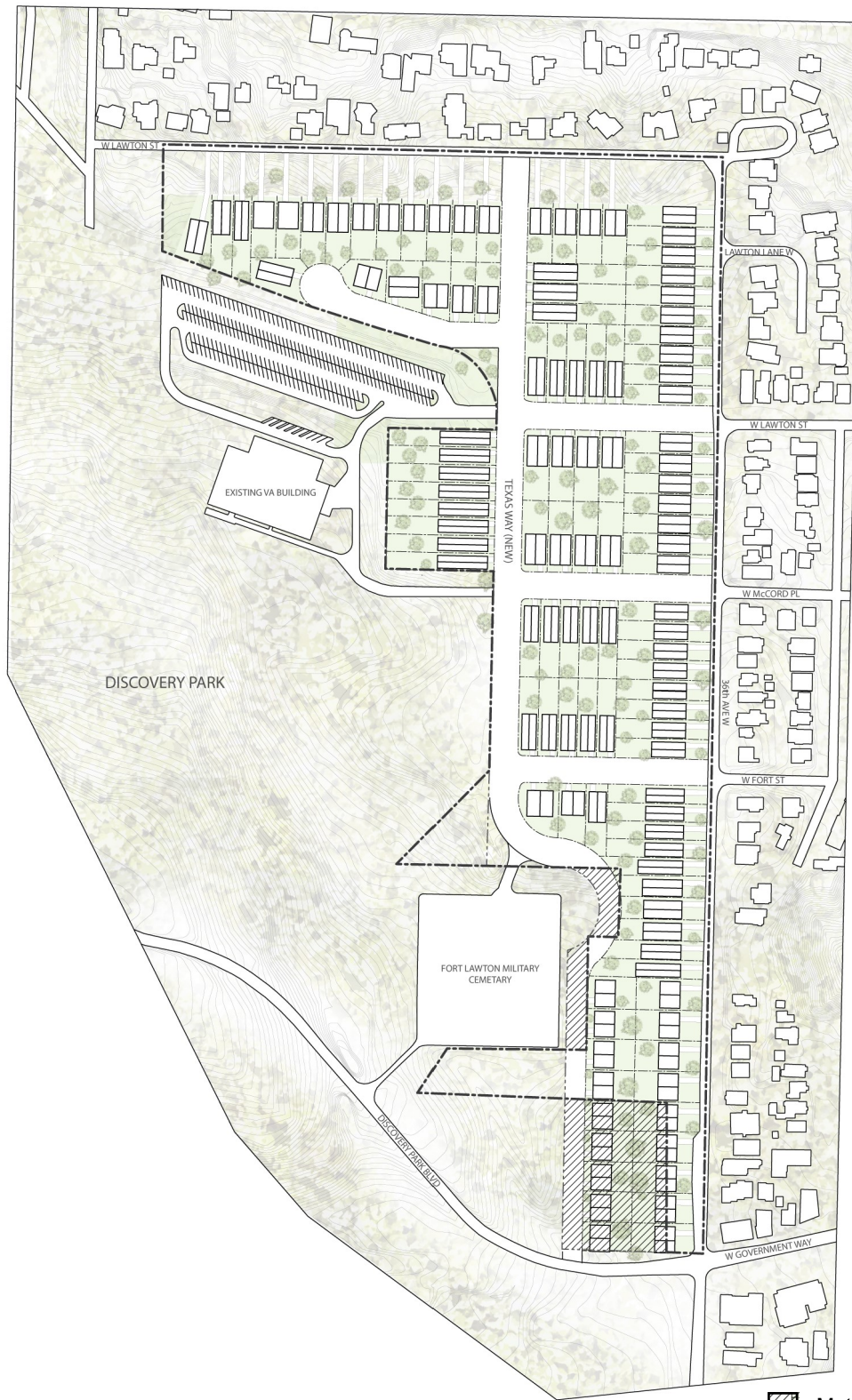
Conveyance/Sale of Property

Under Alternative 2, no public property conveyances by the U.S. Army to the City of Seattle per the BRAC process would occur. The property would be sold to a home developer/builder to develop the Fort Lawton site as market-rate housing.

Development of the Talaris site as affordable and formerly homeless housing would require purchase of the property by affordable housing developers.

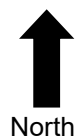
⁹Based on 2.33 residents per unit in the Magnolia neighborhood from the American Community Survey 2009-2013, census tract aggregation.

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Note: This figure is not to scale

Matches project area in Fort Lawton USARC Environmental Assessment (2012)

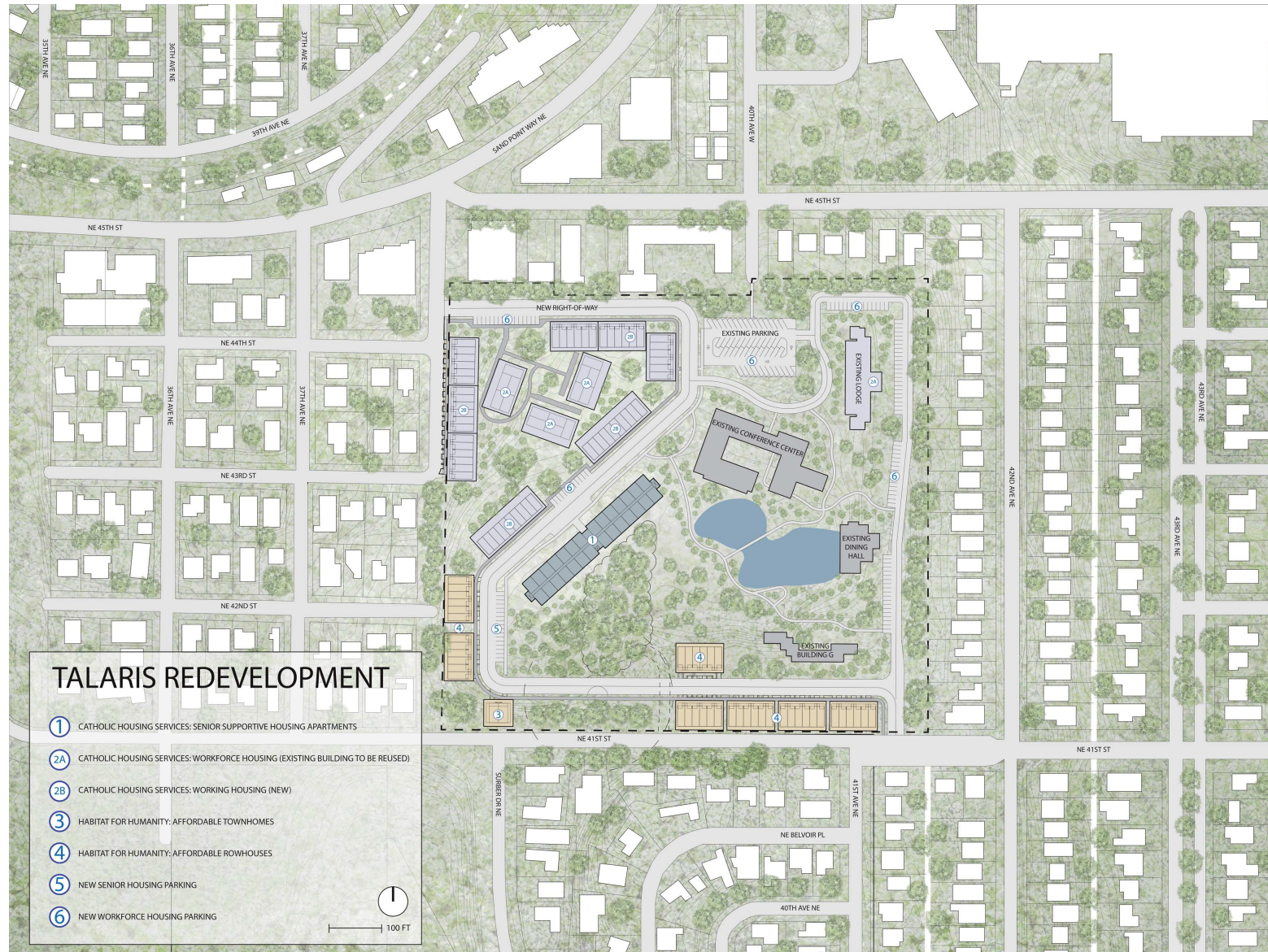


North

Source: SMR Architects, 2017.

Figure 2-10
Fort Lawton Site Plan—Alternative 2

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Note: This figure is not to scale

Source: SMR Architects, 2017.



Figure 2-11

Talaris Site Plan—Alternatives 2 and 3

Zoning Reclassification

The single-family detached housing under Alternative 2 would be an allowed use under the Fort Lawton site's SF 7200 zoning. A zoning reclassification of the Fort Lawton site would not be required.

The Talaris property would require a rezone to lowrise residential zoning (e.g. Lowrise 3), as well as potential amendments to Subchapter II of Chapter 23.34. A Comprehensive Plan amendment would also be required to allow for a rezone to lowrise residential zoning.

Phasing Plan

Like Alternative 1, Alternative 2 would be developed in phases over the course of approximately 7 years, with buildout assumed by 2025 (subject to market conditions).

Demolition and Grading

All the existing buildings on the Fort Lawton site would be demolished and removed under Alternative 2 to construct the market-rate housing. It is assumed that all the existing buildings on the Talaris site would be retained and reused for the affordable and formerly homeless housing and community facilities, and that new residential buildings would be constructed as well.

As with Alternative 1, residential buildings and associated infrastructure would be designed to conform to the existing site topography on the Fort Lawton site; minimal grading would occur. Minimal grading is also anticipated for the residential uses and associated infrastructure at the Talaris site.

Proposed Development

Housing

Alternative 2 would include approximately 113 market-rate housing units on the Fort Lawton site. The market-rate housing would be sold at the prevailing price. Given the current housing prices in the Magnolia area, these homes would likely only be affordable to upper income households. Like Alternative 1, Alternative 2 would provide a total of up to 238 affordable and formerly homeless housing units; however, this housing would be located at the Talaris site. **Table 2-5** provides a breakdown of the housing units under Alternative 1; for purposes of analysis in this EIS these are assumed to be the same under Alternative 2.

Parks and Recreation Areas

No public parks or recreation areas would be provided on the Fort Lawton site with development under Alternative 2. Up to 35% of the individual lots on the site would likely be covered in buildings, as allowed by the site's SF 7200 zoning. The remaining 65% of the lots would be in private yards for use by the individual homeowners.

Up to 4.7 acres of forested land in the west portion of the site that borders Discovery Park could be: retained by the U.S. Army and used as open space for the FLARC VA offices; purchased by the developer of the private homes and used as private open space for the development; or purchased by the City for future public use.

Community Facilities

Alternative 2 would include community facilities in three of the existing buildings on the Talaris site. These facilities would be available for use by residents of the project as well as the public, and would include conference and dining areas.

Landscaping

Landscaping on the Fort Lawton site under Alternative 2 would be at the discretion of the homebuilder(s) and homeowners.

The Talaris site landscaping has been designated as an historic landmark by City of Seattle. Under Alternative 2, much of the existing landscaping would be retained with the development of the affordable and formerly homeless housing on this site. Any modifications to the existing landscaping would adhere to the requirements of the site's historic landmark designation.

The treatment of any exceptional trees on the Fort Lawton and Talaris sites would adhere to the requirements in SMC Chapter 25.11.

Access/Parking/Transit

Access

Under Alternative 2, vehicular access through the Fort Lawton site would be provided via Texas Way W and other public streets. Texas Way W would likely terminate in a cul-de-sac. The primary access point to the site would continue to be from the south via the intersection at W Government Way. Access would also be available from the north via a new intersection off W Lawton Street and from the east via three new access points along 36th Avenue W. The access at W Government Way would be shifted to the west, along the site property line to accommodate proposed development under Alternative 2 and to provide additional separation from the existing W Government Way/36th Avenue NE intersection.

Access to the Talaris site would continue as under existing conditions. Vehicular access through the Talaris site would be provided by private roadways. Access to the site would be available from the south via two access points off NE 41st Street and from the west via one access point off 38th Avenue NE.

Parking

A total of approximately 254 parking spaces would be provided on the Fort Lawton site for the market-rate housing under Alternative 2. These parking spaces would be located within the buildings. A total of 295 parking spaces would be provided on the Talaris site, 206

spaces for the affordable and formerly homeless housing and 89 spaces for the community facilities. Parking under Alternative 2 would meet the requirements in the Seattle Municipal Code (SMC 23.54.015).

Transit

No transit facilities would be provided on either the Fort Lawton or Talaris sites under Alternative 2.

Utilities

Alternative 2 would require water, sewer, stormwater, electrical and solid waste service for housing uses at the Fort Lawton site and housing and community facilities at the Talaris site. SPU would continue to provide water and sewer service, Seattle City Light electrical service, PSE natural gas service and a licensed private contractor solid waste service to the sites. Necessary utility extensions would be made to serve development at both sites. Temporary stormwater control systems would be installed for construction and permanent stormwater control systems for operation of the project, per City of Seattle standards (see Section 3.12, **Utilities**, for details).

Project Design

All the housing on the Fort Lawton site under Alternative 2 would be single-family detached homes. As allowed by the site's SF 7200, the Alternative 2 buildings would be a maximum of 30 feet in height, except:

- If a lot is less than 30 feet wide, then building height would be a maximum of 25 feet; and
- For buildings with pitched roofs, the roof may extend up to 5 feet above the maximum building height.

Market-rate homes would likely be designed to appeal to high income buyers purchasing homes in the \$1.5 million range. Based on comparable new developments, units would be 3 bedroom/3 bathroom or 4 bedroom/4 bathroom homes. Building footprints would likely maximize the 7,200 sq. ft. lots.

Under Alternative 2, some of the affordable and formerly homeless housing on the Talaris site would occupy existing, renovated buildings, while other of the housing would be in newly constructed buildings. The community facilities would occupy existing, renovated buildings on the Talaris site. All the existing building exteriors on the Talaris site have been designated as an historic landmark by City of Seattle. As such, any modifications to the existing buildings would adhere to the requirements of the buildings' historic landmark designation. The design of new housing on the Talaris site would be similar to the building design under Alternative 1 and would blend with the existing historic architecture onsite.

Supportive Services, Community Facilities and Resident Associations

Under Alternative 2, supportive services would be provided for the formerly homeless senior residents and community facilities and resident associations would be incorporated into the affordable rental and ownership housing, like under Alternative 1. However, these would be located at the Talaris site.

Sustainability

Under Alternative 2, the market-rate housing developed on the Fort Lawton site could incorporate sustainable development features, at the discretion of the home developer/builder(s). Housing would be required to adhere to the energy requirements in the most current International Building Code (IBC).

The affordable and formerly homeless housing on the Talaris site would adhere to the Evergreen Sustainable Development Standards (ESDS), and would include sustainable stormwater control and landscape features like those under Alternative 1.

Alternative 3 - Public Park Onsite; Affordable and Homeless Housing Offsite

Under Alternative 3, the entire Fort Lawton site would be developed as a public park; construction of affordable and formerly homeless housing would occur at the Talaris site.

As shown in **Table 2-2**, 9.3 acres (27% of the Fort Lawton site) would be covered in built areas/impervious surface areas and 24.6 acres (73% of the site) would be covered with open space/pervious surface areas under Alternative 3. Approximately 50% of the Talaris site would be covered in built/impervious surfaces and 50% in open space/pervious surfaces.

Alternative 3 would include approximately 29.0 acres of park and recreation uses and 90 parking spaces on the Fort Lawton site, and approximately 256,551 sq. ft. of residential uses (up to 238 units), 30,621 sq. ft. of community facilities and 295 parking spaces on the Talaris site (see **Table 2-2**, **Figure 2-11**, Talaris Site Plan – Alternatives 2 and 3, and **Figure 2-12A** and **Figure 2-12B**, Fort Lawton Site Plan – Alternative 3).

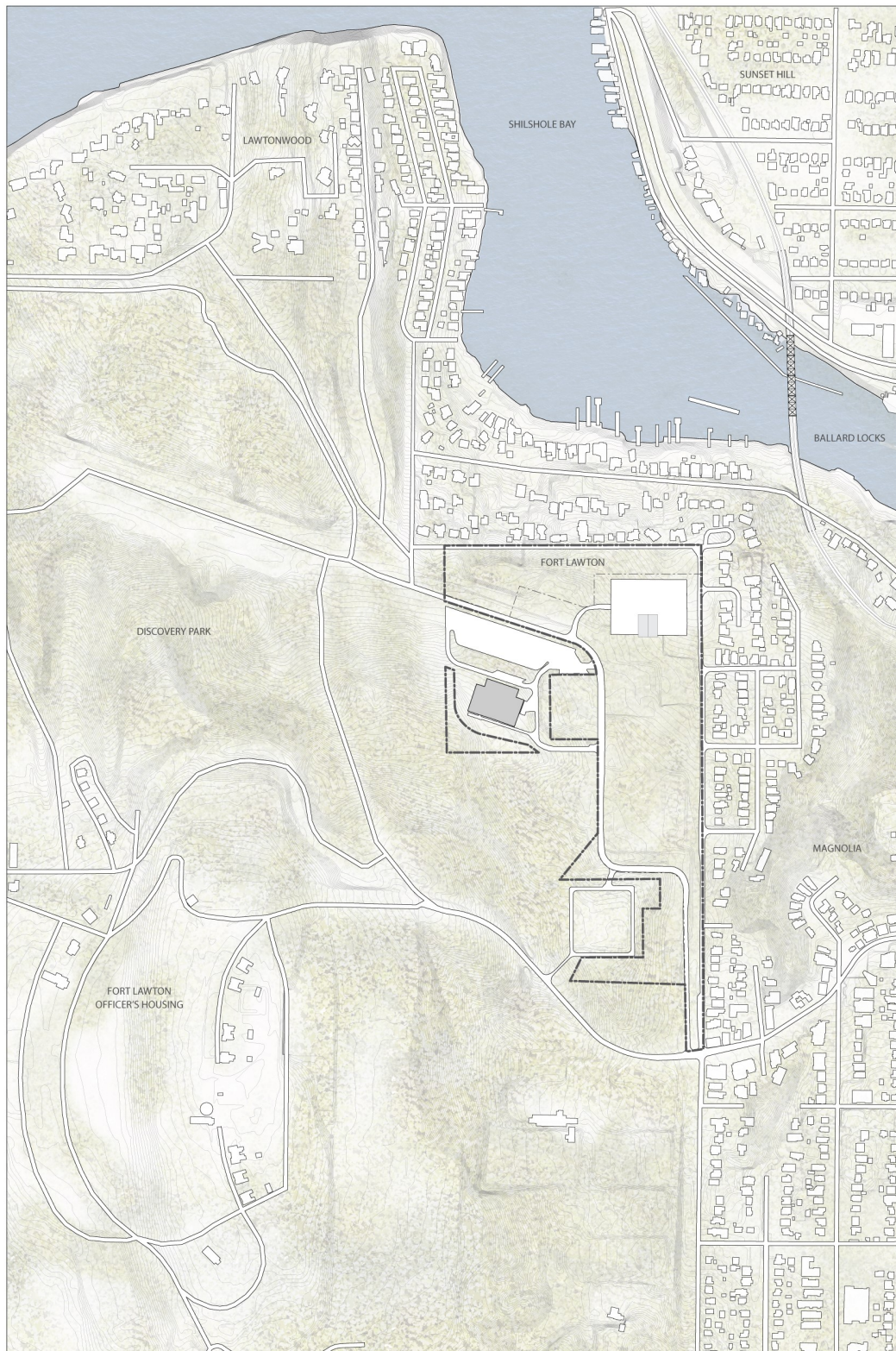
Alternative 3 is anticipated to accommodate approximately 596 residents on the Talaris site.

Conveyance/Sale of Property

Under Alternative 3, the U.S. Army would implement a public conveyance of the Fort Lawton property for parks and recreation uses.

Development of the Talaris site as affordable and formerly homeless housing would require purchase of the property by affordable housing developers.

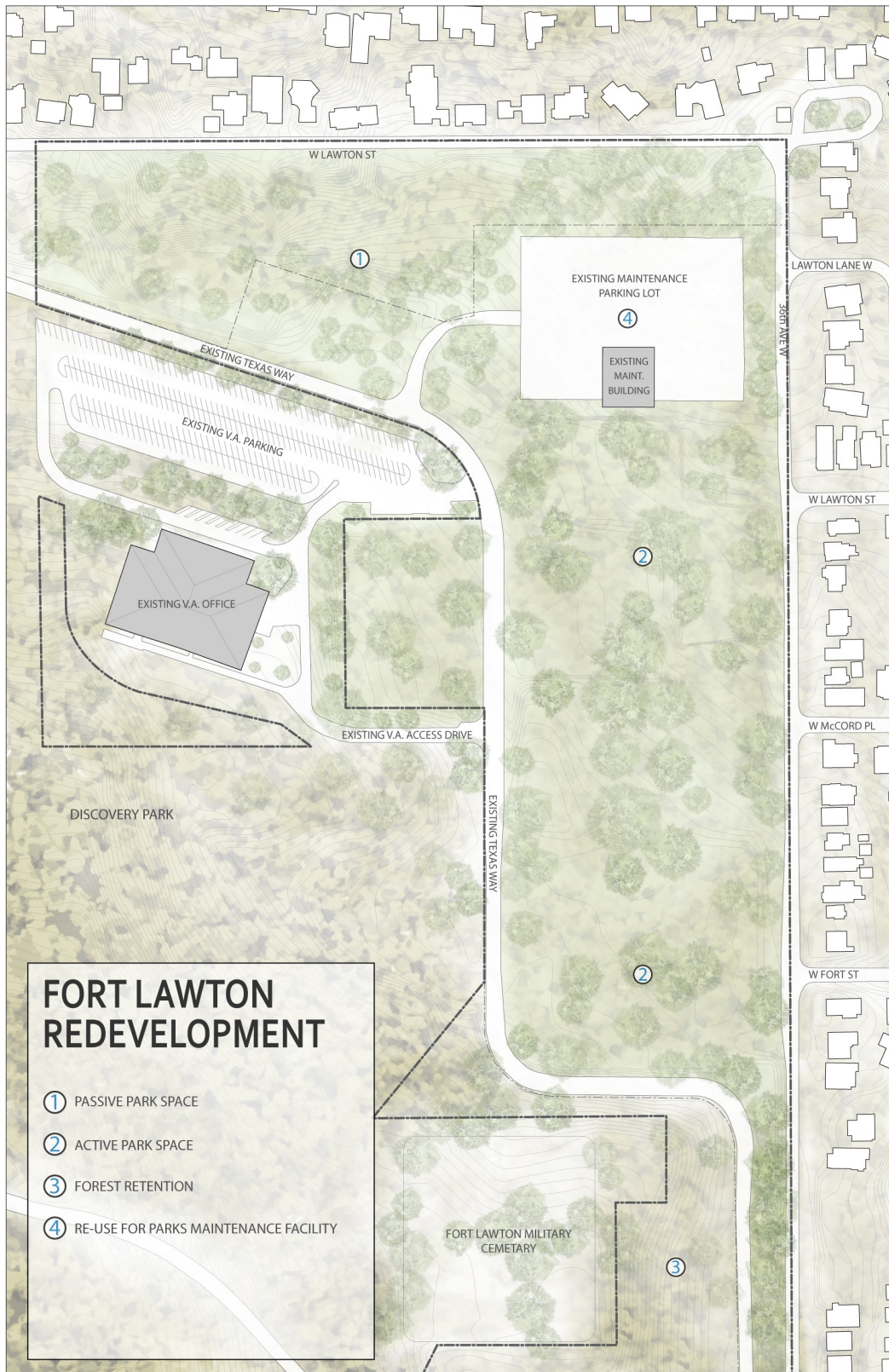
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Note: This figure is not to scale

Source: SMR Architects, 2017.

Fort Lawton Army Reserve Center Redevelopment Project Draft Environmental Impact Statement



Note: This figure is not to scale

Source: SMR Architects, 2017.

Figure 2-12B
Fort Lawton Site Plan—Alternative 3

Zoning Reclassification

Park uses on the Fort Lawton site under Alternative 3 would be allowed by the site's SF 7200 zoning. Alternative 3 would not require a zoning reclassification of the site.

The Talaris property would require a rezone to lowrise residential zoning (e.g., Lowrise 3), as well as potential amendments to Subchapter II of Chapter 23.34. A Comprehensive Plan amendment would also be required to allow for a rezone to lowrise residential zoning.

Phasing Plan

Like Alternative 1, parks and recreation uses on the Fort Lawton site and affordable and formerly homeless housing on the Talaris site under Alternative 3 would be developed in phases over the course of approximately 7 years. Buildout is assumed to occur by 2025 (subject to market conditions). At this point, SPR does not have the funding to design and build the parks and recreation facilities on the Fort Lawton site. The property would be banked until funding is secured in the future.

Demolition and Grading

As with Alternative 1, all the existing buildings on the Fort Lawton site would be demolished and removed except OMS - Building 245 under Alternative 3. OMS - Building 245 would be preserved and used as a parks maintenance facility by SPR.

Site grading would occur during initial site preparation and during all subsequent phases of site redevelopment. Like Alternative 1, park and recreations uses and associated infrastructure on the Fort Lawton site would be designed to conform to the existing site topography; minimal grading would occur. Minimal grading is also anticipated for the residential uses and infrastructure at the Talaris site.

Proposed Development

Housing

No housing would be developed on the Fort Lawton site under Alternative 3. A total of up to 238 affordable and formerly homeless housing units would be provided on the Talaris site, like under Alternative 2. **Table 2-5** provides a breakdown of the housing units under Alternative 1; for purposes of analysis in this EIS these are assumed to be the same under Alternative 3.

Parks and Recreation Areas

Under Alternative 3, most the Fort Lawton site (73%) would be in open space, including: passive and active open space areas (see **Table 2-2**). These areas would be available for use by the public.

Passive Open Space Areas

A total of 17.0 acres of the site would be provided for passive recreation activities. Existing wooded areas in the north and south parts of the site would be preserved in their natural

condition. Passive parks would be provided in the north portion of the site. Like Alternative 1, up to 4.7 acres of forest land owned by the U.S. Army in the west portion of the site could be dedicated to Discovery Park. All passive parks would be designed and constructed to SPR standards, and would be owned and maintained by SPR.

Active Open Space Areas

A total of 7.6 acres of the site would be developed as active open space areas. Three unlit, multi-purpose fields would be provided. It is anticipated that some league play would occur on these fields. The fields would require electricity to maintain the fields. All fields would be designed and constructed per SPR standards, and would be owned and maintained by SPR.

Pedestrian Facilities

Sidewalks and trails would be located throughout the site to provide opportunities for non-motorized circulation. Texas Way W would be improved to add a sidewalk or walkway on the east side of the street adjacent to new development areas. In addition, the existing sidewalk on the west side of the street would be maintained. No direct sidewalk/trail connections would be provided to the Magnolia neighborhood to the east or Discovery Park to the west.

Maintenance Building

The existing SPR maintenance building (OMS Building 245) and associated surface parking area and driveway in the north part of the Fort Lawton site would be retained under Alternative 1. These facilities would be used for parks maintenance purposes. No new infrastructure would be required for the building. Controlled access to the maintenance building parking area would be available from a driveway off of Texas Way.

Community Facilities

Alternative 3 would include community facilities in existing buildings on the Talaris site. These facilities would be available for use by residents of the project as well as the public, and would include conference and dining areas.

Landscaping

Under Alternative 3, the landscape concept for the parks and recreation component of the project on the Fort Lawton site would feature preservation of wooded areas (e.g., in the north and south portions of the site), retention of passive use lawn areas and development of active playfields.

The Talaris site landscaping has been designated an historic landmark by City of Seattle. Under Alternative 3, much of the landscaping would be retained with the development of affordable and formerly homeless housing on this site. Any modifications to the existing landscaping would adhere to the requirements of the site's historic landmark designation.

The treatment of any exceptional trees on the Fort Lawton and Talaris sites would adhere to the requirements in SMC Chapter 25.11.

Access/Parking/Transit Facilities

Access

Under Alternative 3, the primary access point to the Fort Lawton site would continue to be from the south via the intersection of Texas Way W and W Government Way. Access would also continue to be available from the north via the intersection of Texas Way W and 40th Avenue W (see **Figure 2-11**).

Parking

A total of 90 parking spaces would be provided on the Fort Lawton site for park and recreation uses under Alternative 3. These parking spaces would be in paved surface parking lots. A total of 295 parking spaces would be provided on the Talaris site, 206 spaces for the affordable and formerly homeless housing and 89 spaces for the community facilities. Parking under Alternative 3 would meet the requirements in the Seattle Municipal Code (SMC 23.54.015).

Transit

Like Alternative 1, King County Metro transit bus stops would be provided at two locations along Texas Way W on the Fort Lawton site.

Utilities

Alternative 3 would require water, sewer, stormwater, electrical and solid waste service for park and recreation uses at the Fort Lawton site and housing uses and community facilities at the Talaris site. SPU would continue to provide water and sewer service, Seattle City Light electrical service, PSE natural gas service and a licensed private contractor solid waste service to the sites. Necessary utility extensions would be made to serve development at both sites. Temporary stormwater control systems would be installed for construction and permanent stormwater control systems for operation of the project, per City of Seattle standards (see Section 3.12, **Utilities**, for details).

Project Design

Under Alternative 3, some of the affordable and formerly homeless housing on the Talaris site would occupy existing, renovated buildings, while other of the housing would be in newly constructed buildings. The community facilities would occupy existing, renovated buildings on the Talaris site. All the existing building exteriors on the Talaris site have been designated as an historic landmark by City of Seattle. As such, any modifications to the existing buildings would adhere to the requirements of the buildings' historic landmark designation. The design of new housing on the Talaris site would be like the building design under Alternative 1 on the Fort Lawton site and would blend with the existing historic architecture onsite.

Supportive Services, Community Facilities and Resident Associations

Under Alternative 3, supportive services would be provided for the formerly homeless senior residents and community facilities and resident associations would be incorporated into the affordable rental and ownership housing, like under Alternative 1. However, these would be located at the Talaris site.

Sustainability

Under Alternative 3, the affordable and formerly homeless housing on the Talaris site would adhere to the Evergreen Sustainable Development Standards (ESDS), and would include sustainable stormwater control and landscape features like Alternative 1.

2.8.1 Alternative 4 - No Action Alternative

Under the No Action Alternative, the Fort Lawton site would remain in its existing vacant condition. The property would not be conveyed by the U.S. Army to the City of Seattle per the BRAC process. The City would terminate its lease of the property and the Army would resume maintenance of the site and facilities. Buildings and infrastructure would likely continue to deteriorate.

The site could be conveyed to the City or conveyed or sold to another entity in the future, and could be developed in accordance with the uses allowed by the site's current SF 7200 zoning.

2.9 BENEFITS AND DISADVANTAGES OF DEFERRING PROJECT IMPLEMENTATION

The benefits of deferring approval of the Proposed Actions and implementing redevelopment of the Fort Lawton Project include deferral of:

- Potential impacts of the redevelopment on the natural environment (e.g., critical areas, air quality and noise on and adjacent to the site); and
- Potential impacts of the redevelopment on the man-made environment (i.e., traffic operations, aesthetics/views, historic and cultural resources, public services and utilities).

The disadvantages of deferring approval of the Proposed Actions and implementation of redevelopment include deferral of:

- The opportunity for conveyance of the Fort Lawton property by the U.S. Army to the City of Seattle;
- The opportunity to implement housing and parks and recreation development on the Fort Lawton site;
- The opportunity to increase the quantity of affordable and formerly homeless housing, including for senior citizens and veterans in Seattle;

- The opportunity to optimize density and land uses on a large, contiguous parcel in Seattle;
- The opportunity to provide parks and recreation opportunities for project residents and the public; and
- Tax revenues and other fees (i.e., permit, inspection and utility connection fees) that would accrue to City of Seattle.

Chapter 3

Affected Environment, Impacts, Mitigation Measures and Significant Unavoidable Adverse Impacts

CHAPTER 3

AFFECTED ENVIRONMENT, IMPACTS, ALTERNATIVES, MITIGATION MEASURES AND SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Chapter 3 describes the affected environment, impacts of the alternatives, mitigation measures and any significant unavoidable adverse impacts on the environment that would be anticipated from development of the Fort Lawton Project under the DEIS alternatives.

3.1 EARTH

This section of the DEIS describes the earth-related conditions on and near the Fort Lawton and Talaris sites. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified. This section is based on the geotechnical report prepared by Landau Associate in November 2017 (see **Appendix B**).

Key Findings

Geologic hazards are present at both sites, including steep slopes, erosion and seismic hazards; a methane buffer is also located on the Talaris site. There is minimal potential for methane to migrate onto the Talaris site.

Construction and operation of the project under Alternatives 1, 2 and 3 on and near the geologic hazards could result in significant earth-related impacts. During construction, impacts could include erosion from site clearing and grading, and instability and vibration from building and infrastructure construction. Minimal grading is proposed under Alternatives 1, 2 and 3. Alternative 2 at the Fort Lawton site has a greater potential for erosion/landslides than the other alternatives, with development currently shown on steep slopes/erosion hazard areas. During operation, development under Alternatives 1, 2 and 3 would change impervious surface area on the sites which could impact groundwater. With implementation of site-specific analysis and other project features, and installation of temporary and permanent stormwater control and construction BMPs required by the City, no significant earth-related impacts are expected.

Methodology

Readily available geotechnical information and published sensitive area maps and surficial geologic maps, including from the City, of the two sites were reviewed for this analysis. Based on this information, conclusions were reached related to the potential for unstable conditions/geotechnical hazards to be present on the sites and for proposed development under the EIS alternatives to disturb these areas and potentially cause earth-related impacts (see **Appendix B** for details on the geotechnical analysis methodology).

3.5.1 Affected Environment

This sub-section describes existing earth-related conditions on and near the Fort Lawton and Talaris sites.

Fort Lawton Site

Geology and Topography

The Fort Lawton site is situated within a glacial upland that is locally referred to as Magnolia Bluff. Magnolia Bluff is bounded by Shilshole Bay and Salmon Bay to the north, the Interbay Trough to the east, Elliott Bay and Smith Cove to the south and Puget Sound to the west.

Glacial uplands such as Magnolia Bluff are generally comprised of very dense and hard glacial soils that were laid down during the advance and retreat of several glaciers. The surficial geology of the Fort Lawton site is largely mapped as advance outwash. Various geologic units are present in the deeper subsurface at the Fort Lawton site. In general, the geologic units are ordered from the most recent, or younger deposits, to the oldest and include: Vashon till, Vashon-age advanced outwash, Lawton clay and Olympia beds. The geologic units younger than the Vashon-age glacial till have not been glacially over-ridden. The Vashon-age glacial till and the older units have been glacially consolidated and are typically very dense or hard.

The site generally slopes downward in a series of terraces from higher elevations at the southwest corner to lower elevations to the north and northeast. Steep slopes are present along the north and east edges of the site.

Groundwater

It is likely that any groundwater present at the Fort Lawton site is perched atop the relatively impermeable Lawton clay. Previous subsurface investigations have identified groundwater levels near the site to be approximately 160 feet beneath ground surface (bgs). Groundwater in the area generally flows laterally to the steep hillsides along the coast and deep ravines, such as the Interbay Trough, where groundwater ultimately discharges into Elliott Bay. It is anticipated that groundwater conditions will vary depending on local subsurface conditions, the season, recent weather pattern and other factors.

Geologic Hazards

Geologically hazardous areas are defined because of their potential susceptibility to erosion, sliding, earthquake or other geologic events, or because of their past use (e.g., landfill). These areas may not be suited for development because of public health and safety concerns without conducting specific studies during the design and permitting process.

The City of Seattle defines and identifies geologic hazard areas in its Environmentally Critical Areas Ordinance (SMC 25.09.020) and has developed a folio of maps of the geologically hazardous areas. In general, before development is allowed in or immediately adjacent to mapped critical areas, detailed geotechnical studies must be conducted to address specific standards relating to site geology and soils, seismic hazards and facility design.

A discussion of steep slope and landslide, seismic, landfill, erosion and flood hazards at the Fort Lawton site follows.

Steep Slopes and Landslide Hazards

The City generally defines steep slope areas as those areas that rise at an inclination of 40 percent or more with a vertical change in elevation of at least 10 feet. Generally, landslide hazard areas are defined as:

Any area with a combination of:

- Slopes greater than 15 percent;
- Impermeable soils (typically silt and clay) frequently interbedded with granular soils (predominantly sand and gravel);
- Springs or groundwater seepage;
- Any area that has shown movement during the Holocene Epoch (from 10,000 years ago to present) or is underlain by mass wastage debris of that epoch;
- Any area subject to instability due to rapid stream erosion, stream bank erosion or undercutting by wave action;
- Any area that shows evidence of, or is at risk from, snow avalanches; and/or
- Any area located on an alluvial fan that is presently subject to, or potentially subject to, inundation by debris flows or deposition of stream-transported sediments.

The north portion Fort Lawton site and an area along the west portion of the site are mapped as potential slide areas, with smaller localized areas mapped as steep slopes. Additionally, the City of has identified previous slide activity both to the north and south of the site.

Seismic Hazards

Seismic hazard areas are generally defined as those areas subject to severe risk of earthquake damage due to ground shaking, ground rupture or soil liquefaction. Ground shaking can occur large distances from the earthquake source; ground rupture only occurs along active fault traces; and liquefaction requires a certain combination of soil and groundwater conditions.

Ground Shaking - The entire Puget Sound region lies within a seismically active area, and moderate to high levels of ground shaking should be anticipated during the design life of a project at the Fort Lawton site. Due to the previous development at the site, there is potential for undocumented near-surface deposits of relatively loose/soft fill soils that could affect the level of earthquake ground shaking felt in the area.

Ground Rupture - The Seattle Fault Zone, located about 6 miles south of the Fort Lawton site, is the closest reported fault zone to the site. The Seattle Fault Zone is about 3 to 4 miles wide and consists of a series of east-west trending faults. Future ground rupture may occur within the Seattle Fault Zone; however, the actual risk at the site posed by such ground rupture is relatively small given the relatively thick deposits of glacial soils and the distance between the site and the fault zone.

Liquefaction – Liquefaction can occur when certain soils lose strength and temporarily behave as if they were a liquid when shaken by an earthquake. The seismically induced loss of strength can impact building foundations and embankments. Seismically induced liquefaction typically occurs in loose, saturated, sandy material commonly associated with recent river, lake and beach sedimentation. In addition, seismically induced liquefaction can be associated with areas of loose, saturated fill.

Due to the glacially consolidated nature of the soils and deep depth to groundwater at the Fort Lawton site, it is not anticipated that liquefaction will pose a large hazard to development. While there may be undocumented fill at the site, it is unlikely that it will be thick enough or saturated enough to pose a serious liquefaction threat with development.

Erosion Hazards

Erosion hazard areas are defined as those areas containing soils that may experience severe to very severe erosion from construction activity. The susceptibility to erosion is generally a function of soil type, topography, occurrence of groundwater seepage or surface runoff, and the built environment.

The surficial geology at the Fort Lawton site has been identified as advance outwash and likely undocumented fill. When unvegetated and/or disturbed, advance outwash and fill materials may experience severe to very severe erosion hazards on slopes exceeding 15 percent.

Landfills and Flood Hazards

No landfills are known to exist on or adjacent to the Fort Lawton site. The City has not mapped the site as being in a flood hazard area.

Talaris Site

Geology and Topography

The Talaris site is situated in the Laurelhurst neighborhood of North Seattle. Laurelhurst is bounded by the Hawthorne Hills and Ravenna neighborhoods to the north, Wolf Bay and Lake Washington to the east, Union Bay to the south and the Union Bay Natural Area (formerly the Montlake Landfill) and the University of Washington bluff to the west. The Laurelhurst neighborhood includes glacial uplands as well as marshlands, and as a result, soils in this area may consist of a mixture of loose to very dense glacial soils and very soft marsh deposits.

Various geologic units are present at the Talaris site, including: peat deposits, recessional outwash and ice contact deposits.

The Talaris site topography is general flat to rolling, with limited areas of steep slopes.

Groundwater

Previous subsurface investigations have identified groundwater at depths ranging from 0 to 25 feet bgs. A confined aquifer is likely present beneath the ice contact deposits onsite. It is anticipated that groundwater will be encountered at shallow depths near the marsh and will be deeper in upland areas of the Talaris site.

Geologic Hazards

A discussion of steep slope and landslide, seismic, landfill, erosion and flood hazards at the Talaris site is provided below, based on the definitions in the City's Environmentally Critical Areas Ordinance (SMC 25.09.020) and the its folio of maps of geologically hazardous areas.

Steep Slopes and Landslide Hazards

Localized steep slope areas are located along the eastern edge of the Talaris site, as well as along Talaris Way; however, no areas on or near the site have been identified as potential slide areas.

Seismic Hazards

Ground Shaking – As mentioned previously, the entire Puget Sound region lies within a seismically active area, and moderate to high levels of ground shaking should be anticipated during the design life of development at the Talaris site. Due to the presence

of relatively thick peat deposits, the near-surface soils at the Talaris site could affect the level of earthquake ground shaking felt in the area.

Ground Rupture – The Seattle Fault Zone, located about 5 miles south of the Talaris site, is the closest reported fault zone to the site. Future ground rupture may occur within the Seattle Fault Zone; however, the actual risk at the Talaris site posed by such ground rupture is relatively small given the relatively thick deposits of glacial soils and the distance between the site and the fault zone.

Liquefaction - Due to the presence of ice contact and recessional outwash and relatively thick peat deposits at the Talaris site, it is anticipated that soil liquefaction would pose a risk to development at the site.

Erosion Hazards

The soils at the Talaris site have been identified as peat, recessional outwash and ice contact deposits, and likely undocumented fill. When unvegetated and/or disturbed (e.g., during construction), ice contact deposits, recessional outwash and fill materials may experience severe to very severe erosion hazards on slopes exceeding 15 percent. Peat deposits are typically found on very shallow slopes or flat areas and would not be expected to be an erosion hazard; however, depending on the composition of the peat, it may be erodible in unprotected cut slopes.

Landfills

The abandoned Montlake Landfill is located to the south and east of the Talaris site. While the site is within the 1,000-foot methane buffer of the old landfill, previous studies have indicated that the risk of methane migrating from the abandoned landfill onto the site is low.

Flood Hazards

The Talaris site is not mapped as being in a flood hazard area.

(See **Appendix B** for details on the existing earth-related conditions at the Fort Lawton and Talaris site.)

3.1.2 Impacts of the Alternatives

An analysis of the potential adverse earth-related impacts of Alternative 1, the Applicant's Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant's Preferred Alternative)

Fort Lawton Site

Construction

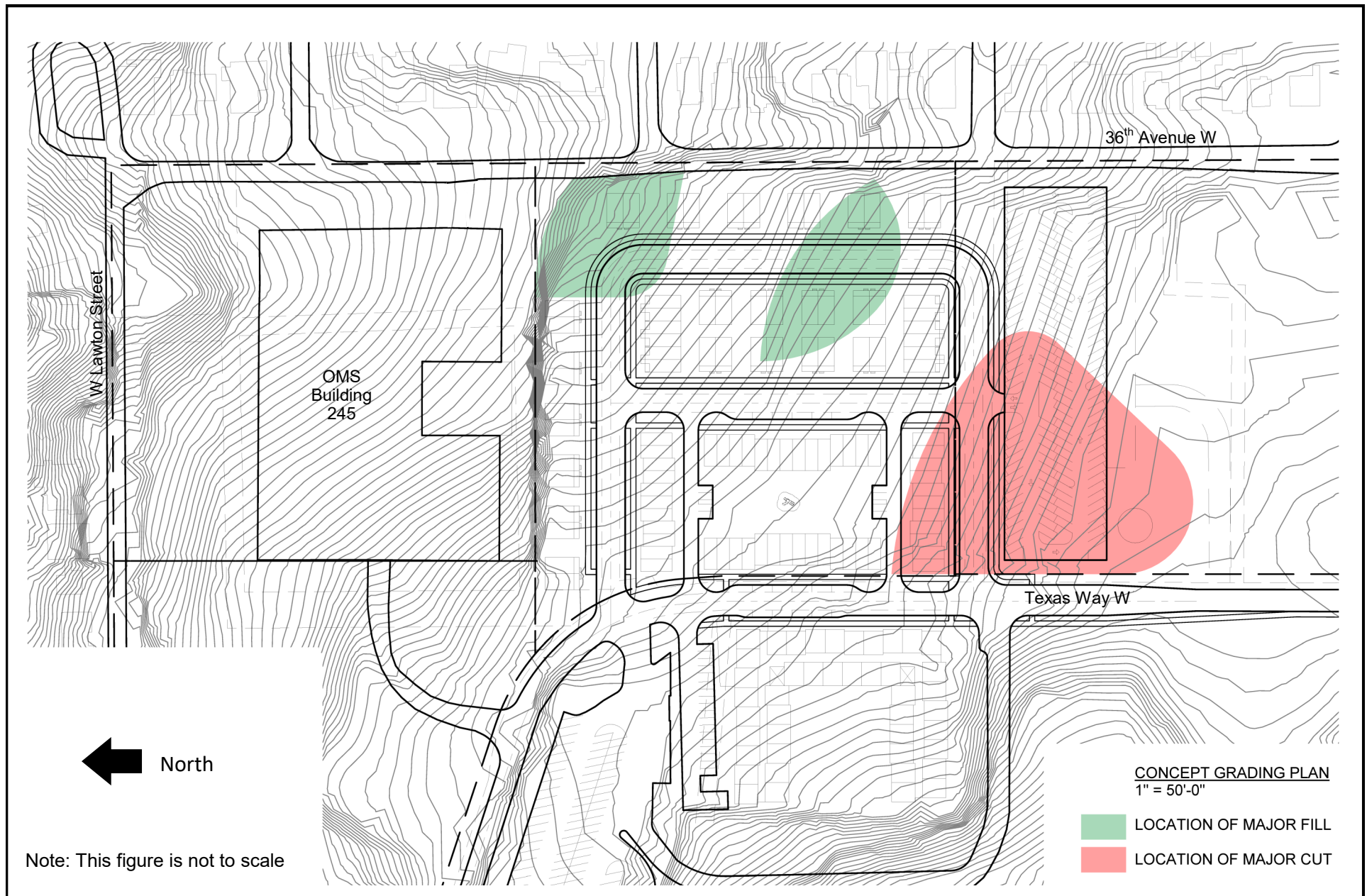
Development of Alternative 1 at the Fort Lawton site would include removing some of the existing pavement and most of the structures and preparing subgrade soil by grading, and placing and compacting structural fill. Proposed structures would be designed to conform to the existing site topography and minimal grading would occur, except at a large hill located on the south end of the site next to the existing road (note: the general topography and slopes onsite are similar to the site's natural condition, but all the small hills or mounds could have been created by past filling). Assuming it is suitable to be used as fill, the soil from the hill would be moved to the north part of the site where steep grades currently exist. No soil would be imported or exported from the site in this concept, but approximately 11,000 cubic yards of soil would be moved. The locations of major cut and fill are indicated on **Figure 3.1-1**.

Construction for Alternative 1 could result in exposed soil and soil stockpiles, which could erode and cause on-site and off-site transport of sediment. However, temporary erosion and sedimentation control measures would be implemented during construction to reduce the potential for erosion-related impacts.

Temporary excavations would likely be required for the installation of future structures and infrastructure. Without mitigation, these excavations could impact immediately adjacent existing and future structures, utilities and other improvements. However, standard construction measures would reduce the potential for such impacts.

As mentioned above, surficial on-site soil that is excavated as part of site development could be reused as on-site fill. All structural fill and backfill material placed as part of future site improvements would be densely compacted which could cause vibrations and potential settlement of structures in the immediate vicinity of the construction work. Placement of large volumes of fill could also cause settlement/ground subsidence that could impact existing or future structures in the immediate area of the fill. However, site grading is expected to be minimal and site-specific analysis and design of fill placement near settlement-sensitive structures would be conducted to address the potential for settlement impacts at nearby structures and significant impacts are not expected.

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Source: SMR Architects, 2017.

Figure 3.1-1

Fort Lawton Grading Plan—Alternative 1

Geologic Hazards

The potential geologic hazard impacts of development under Alternative 1 at the Fort Lawton site are discussed below.

Settlement -The surficial soil at the site is not anticipated to be prone to great amounts of settlement with development under Alternative 1.

Landslides/Steep Slopes - There is a potential for landslides to occur at the existing steep, landslide-prone slopes in the north and west portions of the Fort Lawton site. The impact of landslides is considered moderately low for Alternative 1 given that these portions of the site would be maintained in their natural forested condition.

Erosion Hazards – When unvegetated and/or disturbed, the on-site soils could experience severe to very severe erosion hazards on slopes exceeding 15 percent. Site-specific analyses would be conducted to address this potential impact. Additionally, erosion control measures and Best Management Practices (BMPs) during construction would be implemented to reduce erosion impacts.

Seismic Hazards - Moderate to high levels of ground shaking should be anticipated during the design life of Alternative 1. The relatively loose/soft fill near-surface soils at the site could affect the level of earthquake ground shaking felt in the area. Seismic design using current design codes and generally accepted engineering standards and practices during the design phase of the project would reduce the potential impacts to buildings and infrastructure from ground shaking.

The potential for ground rupture, liquefaction and landslide impacts from earthquakes and their potential to damage structures under Alternative 1 are considered minimal.

Landfill Areas and Floodplains – There are no landfills or floodplains known to exist on or adjacent to the site that could impact development under Alternative 1.

Groundwater

Groundwater could be encountered at relatively shallow depths onsite, particularly during the winter and spring months, and construction dewatering could be required. Dewatering could cause some ground settlement and damage to adjacent utilities and structures. If extensive dewatering is required, site-specific analyses would determine what structures could be influenced by excavation dewatering and the appropriate control measures.

While temporary excavation dewatering could be required for certain structures, the effect on groundwater would be temporary and localized and no significant impacts are expected.

Operation

At build-out under Alternative 1, the Fort Lawton site would be covered in roadways, parking areas, structures, vegetated sports fields, landscaping and preserved natural open space. Approximately 13.2 acres of the site would be in impervious surfaces, compared to 18.5 acres under existing conditions. Therefore, there would be no decrease in recharge to the aquifer beneath the site, and there could be some increase in recharge.

A permanent stormwater management system would be designed and installed onsite, in accordance with the Seattle Stormwater Code. As a result, earth-related impacts during operation of the project would be minimal. The proposed stormwater management system could include retention basins and rain gardens; there could be some recharge to the aquifer near these facilities.

Talaris Site

Under Alternative 1 the Talaris site would not be redeveloped at this time and no earth-related impacts are anticipated.

(See **Appendix B** for details on potential earth-related impacts under Alternative 1.)

Alternative 2 – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Construction

Like Alternative 1, development at the Fort Lawton site under Alternative 2 would include removing some of the existing pavement and preparing subgrade soils by grading, placing and compacting structural fill. All structures would be removed under Alternative 2. Minimal grading is anticipated; however, construction of retaining walls and/or deep foundations could be necessary.

The potential for erosion/sedimentation, impacts on nearby structures (e.g., due to temporary excavations, and vibration and settlement with placement/compaction of soils) and impacts on groundwater during construction would be like under Alternative 1. With implementation of temporary erosion and sedimentation control measures and BMPs, and proper design and installation of construction-related structures, no significant impacts are expected.

Alternative 2 involves constructing approximately 113 market-rate housing units on the Fort Lawton site. Some of this proposed housing would be built near landslide hazard areas. Site-specific slope stability analyses and design of the residential units and any associated earth retention structures along the top of the slope would be required to address the potential impacts of construction in these areas.

Foundations

If needed due to soil and slope conditions in certain locations, deep foundations, such as pile- or pier-supported foundations, could be used to reduce impacts to steep slopes (e.g., in the north portion of the site; see **Figure 2-10**). Increased levels of noise and vibration could occur within about 50 to 100 feet of pile-driving activities and could result in structural damage. The impact of vibrations is difficult to quantify and would be addressed on a case-by-case basis.

Drilled piles could be used for stabilizing steep slopes in the landslide hazard areas on the site. Installation of temporary casing for the piles could produce ground vibrations and localized ground settlement around the drilled pile construction area. Monitoring of the ground surface would be conducted during construction to address these potential vibration impacts.

Geologic Hazards

Most of the potential geologic hazard impacts (e.g., settlement, erosion hazards, seismic hazards, landfills and floodplains) of development under Alternative 2 at the Fort Lawton site are expected to be like those under Alternative 1. However, the potential for landslide hazard/steep slope impacts would be greater, as discussed below.

Landslide/Steep Slopes - There is a potential for landslides to occur on the existing, steep, landslide-prone slopes in the northern and western portions of the Fort Lawton site. The possibility for landslides is considered relatively high for Alternative 2 because the current site plan shows some of the proposed structures would be located in or near landslide hazard areas (see **Figure 2-10**). Site-specific analyses for future improvements near landslide hazard areas would be prepared prior to any construction to ensure compliance with City of Seattle requirements for setback and design. Retaining walls and/or deep foundations such as driven piles could be used to reduce impacts.

Operation

At build-out under Alternative 2, the Fort Lawton site would be covered in roadways, structures and landscaping. Less area would be preserved in natural open space than under Alternative 1. Approximately 15.3 acres of the site would be in impervious surfaces, compared to 13.2 acres under Alternative 1 and 18.5 acres under existing conditions. Therefore, there would be no decrease in recharge to the aquifer beneath the site, and there could be some increase in recharge.

Like Alternative 1, a permanent stormwater management system would be designed and installed onsite, in accordance with the Seattle Stormwater Code. As a result, earth-related impacts during operation of the project would be minimal.

Talaris Site

Construction

Development at the Talaris site under Alternative 2 would likely include removing some of the existing pavement and preparing subgrade soils by grading, placing and compacting structural fill. None of the structures at the site would be removed under Alternative 2. Minimal grading is anticipated.

The potential for erosion/sedimentation, impacts on nearby structures (e.g., due to temporary excavations, and vibration and settlement with placement/compaction of soils) and impacts on groundwater during construction would be like at the Fort Lawton site. With implementation of temporary erosion and sedimentation control measures and BMPs, and proper design and installation of construction-related structures, no significant impacts are expected.

Highly organic material, such as the peat that underlies a large portion of the Talaris site, would not be suitable for reuse as onsite fill. As a result, it is likely that any fill needed onsite would be imported. All structural fill and backfill material placed for site improvements would be densely compacted, which could cause vibrations and potential settlement of structures in the immediate vicinity of the construction work. Placement of large volumes of fill could also cause settlement/ground subsidence that could impact existing or future structures (onsite or offsite) in the immediate area of the fill. However, site grading is expected to be minimal and site-specific analysis and design of fill placement near existing settlement-sensitive structures would be conducted to address the potential for settlement impacts at nearby structures.

Alternative 2 proposes constructing approximately 238 housing units, a community facility and surface parking on the Talaris site. If any of these structures are constructed in steep slope areas along the eastern edge of the site and along Talaris Way, the stability of the slopes could be compromised. Site-specific slope stability analyses and design would be conducted to address the potential for impacts during construction on the stability of these areas. Additionally, temporary erosion control measures and BMPs would be implemented during construction to reduce erosion impacts.

Soil Preparation

Preloading of soils could be required for the construction of some of the structures on the Talaris site. Potential impacts of preloading would generally be associated with increased quantities of earthwork and the potential for ground subsidence impacts to structures and utilities in the immediate area. Site-specific analysis and design would be conducted; pre- and post-construction surveys of nearby structures would be conducted; and ground movements would be monitored to address these potential impacts.

Ground improvement methods, such as compaction grouting or stone columns, could be used to reduce liquefaction hazard and increase bearing capacity of compressible

foundation soils at the Talaris site. The potential impacts of these ground improvement methods could include vibrations and potential settlement of structures in the immediate vicinity, generating excessive spoils and heave of existing structures and utilities. Pre- and post-construction surveys of nearby structures and monitoring of ground movements would be conducted to address these possible impacts.

Foundations

It is expected that deep foundations would be required to support most of the proposed structures under Alternative 2, and could include driven or drilled piles. Like at the Fort Lawton site, there would be a potential for vibration impacts to nearby structures during installation of the piles. The impact of vibrations is difficult to quantify and would be addressed on a case-by-case basis.

Geologic Hazards

The potential geologic hazard impacts of development under Alternative 2 at the Talaris site are discussed below.

Settlement - Portions of the Talaris site are underlain by loose/soft compressible deposits. Constructing heavy structures or placing significant heights of fill directly on these soils could cause foundation settlement, particularly in the southwest portion of the site. Such settlement could result in damage to structures and utilities. Construction techniques, including using deep foundation systems or preloading a building site prior to construction, would be implemented to address potential settlement impacts.

Landslide Hazard/Steep Slopes - The impact of landslides is considered moderately low for Alternative 2 because the steep slope areas on the Talaris site appear to be localized. Site-specific analyses of the Talaris site would be conducted prior to any construction to ensure compliance with City of Seattle requirements for setback and design.

Erosion Hazard - When unvegetated and/or disturbed, the ice contact deposits, recessional outwash and fill materials at the Talaris site could experience severe to very severe erosion hazards on slopes exceeding 15 percent. The peat deposits are typically found on very shallow slopes or flat areas onsite and would not be expected to be an erosion hazard. However, depending on the composition of the peat, it could be erodible in unprotected cut slopes.

Portions of the site have slopes that exceed 15 percent. Case-by-case basis and site-specific analyses would be conducted for each structure in these areas to address the potential for erosion impacts. Additionally, construction on slopes would employ temporary erosion control measures and BMPs during construction.

Seismic Hazard - Due to the relatively thick peat deposits at the Talaris site, the site may be susceptible to amplified earthquake ground motions. Seismic design using current

design codes and generally accepted engineering standards and practices would be used during the design phase of the future site improvements to reduce potential impacts.

The potential for ground rupture from an earthquake and associated impacts at the Talaris site is relatively small given the relatively thick deposits of glacial soils and the distance between the site and the fault zone.

The liquefiable soils that are present at Talaris site would have a moderate to high seismic risk. There is a potential for loss of soil strength, ground surface settlement and lateral displacement of soils supporting structures founded in or over liquefiable soils. Methods to address potential soil liquefaction would include: ground improvement, deep foundations and/or designing for the potential soil liquefaction impacts.

Although the potential for deep-seated, earthquake-induced landslides at the Talaris site is relatively low, some sloughing and slope movement would likely occur within the loose surficial materials on the localized slopes during a large seismic event. Site-specific slope stability analyses and designing of structures would address these potential impacts.

Landfill Areas - While the Talaris site is within the 1,000-foot methane buffer of the former Montlake Landfill, the risk of methane migrating from the landfill onto the site is considered low. Therefore, no impacts to development at the Talaris site under Alternative 2 are expected.

Groundwater

Groundwater could be encountered within excavations at relatively shallow depths at the Talaris site, particularly during the winter and spring months, and construction dewatering could be required. Dewatering could potentially cause some ground settlement and damage to adjacent utilities and structures. Site-specific analyses would determine what structures could be impacted by dewatering and the best methods to address these impacts. While dewatering could potentially be required for certain structures, the effect on groundwater would be temporary and localized.

Operation

At build-out under Alternative 2, the Talaris site would be covered in roadways, parking areas, structures, landscaping and preserved natural open space. Approximately 50 percent of the site would be in impervious surfaces, compared to 30 percent under existing conditions. However, no significant loss of recharge to the aquifer beneath the site is expected.

A permanent stormwater management system would be designed and installed onsite, in accordance with the Seattle Stormwater Code. As a result, earth-related impacts during operation of the project would be minimal.

(See **Appendix B** for details on potential earth-related impacts under Alternative 2.)

Alternative 3 - Public Park Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Construction

Like Alternative 1, development at the Fort Lawton site under Alternative 3 would include removing some of the existing pavement and most structures, and preparing the subgrade soils by grading, placing and compacting structural fill. Minimal grading is anticipated.

Alternative 3 proposes constructing parks and recreation facilities on the Fort Lawton site, including three multiuse fields. Like under Alternative 1, natural areas in the north and west portions of the site would be retained. The potential for construction impacts, including erosion/sedimentation, impacts on nearby structures (e.g., due to temporary excavations, and vibration and settlement with placement/compaction of soils) and impacts on groundwater during construction would be like under Alternative 1. With implementation of temporary erosion and sedimentation control measures and BMPs, and proper design and installation of construction-related structures, no significant impacts are expected.

Geologic Hazards

Geologic hazard impacts under Alternative 3, including settlement, landslide/steep slopes, erosion hazards, seismic hazards and landfill hazards would be like under Alternative 1.

Groundwater

As described under Alternative 1, the depth to groundwater at the Fort Lawton site is expected to be relatively deep; however, groundwater could be encountered at relatively shallow depths, particularly during the winter and spring months. Therefore, construction dewatering could be required to control groundwater flow into certain excavations. Dewatering could cause some ground settlement and damage to adjacent utilities and structures. If extensive dewatering is required, site-specific analyses would determine what structures could be influenced by excavation dewatering and the appropriate control measures.

Operation

At build-out under Alternative 3, the Fort Lawton site would be covered in roadways, parking areas, a structure, vegetated sports fields and preserved natural open space. There would be 9.4 acres in impervious surfaces under Alternative 3 compared to 13.2 acres under Alternative 1. Therefore, there would be no decrease in recharge to the aquifer beneath the site, and there could be some increase in recharge.

Like Alternative 1, a permanent stormwater management system would be designed and installed onsite, in accordance with the Seattle Stormwater Code. As a result, erosion,

sedimentation and other earth-related impacts during operation of the project would be minimal.

Talaris Site

Potential earth-related impacts during construction and operation of Alternative 3 at the Talaris site would be the same as those described under Alternative 2, because the same development is proposed.

(See **Appendix B** for details on potential earth-related impacts under Alternative 3.)

Alternative 4 – No Action Alternative

Under the No Action Alternative, the Fort Lawton and Talaris sites would not be redeveloped at this time and would remain in their existing conditions. No earth-related impacts are anticipated under Alternative 4.

3.1.3 Mitigation Measures

The following measures have been identified to address the potential earth-related impacts from construction and operation of the Fort Lawton Project under Alternatives 1, 2 and 3. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

Legally-Required Measures

- During construction, contractors would employ temporary erosion and sedimentation control measures and BMPs to control erosion. These measures would be consistent with City of Seattle critical area and grading regulations.
- The foundation support systems would be determined as part of the specific design and permitting of infrastructure and individual buildings. Site-specific studies and evaluations would be conducted in accordance with SMC requirements and the provisions of the current version of the SBC.
- Proper design and construction procedures, including those in the SBC, would be followed to ensure that buildings and infrastructure could withstand a seismic event.
- A permanent stormwater management system would be designed and installed onsite, in accordance with the Seattle Stormwater Code.

Measures Proposed as Part of Project

- Site-specific analyses would be completed prior to construction to address: development on or adjacent to steep slopes areas, and to determine what structures could be influenced by excavation dewatering.
- As appropriate, pile- or pier-supported foundations would be used for structures near landslide hazard areas to reduce impacts to steep slopes.
- Any excavation shoring systems would be properly designed and constructed to address impacts from temporary construction excavations.
- Fill would be designed to control adjacent settlements and ground subsidence impacts. In addition, adjacent structures/surfaces would be monitored during construction to verify that no adverse settlement occurs.
- To limit the potential for adverse vibration impacts from pile driving on nearby structures, vibration monitoring would be conducted during installation of test piles and selected production piles.
- If appropriate, drilled piles would be used to limit the vibration and ground settlement impacts associated with driven piles.
- Ground improvement techniques or deep foundations would be employed to address the potential for liquefaction impacts at the Talaris site.

Other Possible Measures

- The potential use of properly designed retaining walls that are constructed near landslide hazard areas in accordance with City of Seattle critical area and grading regulations would reduce impacts to steep slopes.

3.1.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse earth-related impacts are expected.

3.2 BIOLOGICAL RESOURCES

This section of the DEIS describes the biological resources on and near the Fort Lawton and Talaris sites. Potential impacts from redevelopment of the EIS alternatives on these resources are evaluated and mitigation measures identified. This section is based on the biological resources report prepared by The Watershed Company in October 2017 (see **Appendix C**).

Key Findings

A Wildlife Environmental Conservation Area (ECA) is mapped by the City on the Fort Lawton site (which includes a heron management area); a potential wetland has also been identified on the site. Riparian Corridor, Wetlands and Wildlife ECAs are mapped by the City on the Talaris site (the latter including a bald eagle nest site). The riparian corridor is associated with a stormwater pipe through the site. One wetland has been identified onsite. No federally-listed species or federally-designated habitat are known to occur on either site. Wildlife species of state and/or local importance potentially use the sites and nearby areas.

Construction activity would temporarily disturb wildlife under the action alternatives on the Talaris and Fort Lawton site.

With proposed development, the amount of open space, including wildlife habitat, on the Fort Lawton site would increase over existing conditions under all the action alternatives, with the highest increase under Alternative 3 and Alternative 1, respectively. Open space would decrease relative to existing conditions on the Talaris site under Alternatives 2 and 3.

No direct impacts to critical areas, wildlife habitat or sensitive wildlife species is expected on the Fort Lawton site under Alternative 1 or 3. Under Alternative 2, direct impacts to biological resources would include impacts to the potential wetland area and removal of forested vegetation and wildlife habitat. On the Talaris site, development would remove forested vegetation and wildlife habitat under Alternatives 2 and 3, but would avoid direct impacts to the wetland area and bald eagle nest site. Under all the action alternatives, indirect impacts to retained habitat and wildlife would increase due to increased human activity. There could be a permanent displacement of certain wildlife species less tolerant of urban uses from the Fort Lawton and/or Talaris sites with proposed development.

Methodology

Readily available existing information, including previous site studies, were reviewed to identify wetlands, streams, vegetation and wildlife that may be present on or near the Fort Lawton or Talaris sites. Washington Department of Fish and Wildlife interactive mapping programs were also used as a source of information on wildlife use of the project sites. Information and locations of rare plants was reviewed using WA DNR databases and NatureServe's LandScope Washington mapping application. A site visit to the Fort Lawton

site was conducted on June 28, 2017 to verify previously reported lack of wetlands and streams, assess existing vegetation and note wildlife observations (see **Appendix C** for details on the methodology for the biological resources analysis).

3.2.1 Affected Environment

This sub-section describes existing biological resources on and near the Fort Lawton and Talaris sites, including wetlands, streams, vegetation and fish and wildlife.

Fort Lawton Site

The Fort Lawton site is located in Seattle's Magnolia neighborhood and is bordered by Discovery Park to the south and west and residential properties to the north and east. Also nearby are Kiwanis Memorial Preserve Park to the east and Commodore Park to the northeast. Salmon Bay is located to the northeast. The site contains existing development and some retained natural open space. Existing buildings and parking areas are no longer in use.

Wetlands and Streams

A wetland was identified on the north slope of the Fort Lawton site during a previous study (see **Figure 3.2-1** for the approximate location). Wetland vegetation and topography of this area indicates that wetland or stream features could be present. Additional studies would be needed to document wetlands and/or streams and their required buffers in the north portion of the site. The remaining portions of the Fort Lawton site are not expected to contain wetlands or streams.

Wetlands and streams are mapped in both Discovery Park and Kiwanis Memorial Reserve Park adjacent to the site.

Vegetation

Remaining natural unmaintained vegetation that is present at the Fort Lawton site is primarily located in two areas in the north and south portions of the site. A narrow strip of established trees is also present on the east side of the site (see **Figure 3.2-1**). Most of the wildlife habitat available at the site is located within these areas. The site abuts forests located in Discovery Park to the west. Overall, plant species at the site are typical of urban non-wetland forests in the region. No sensitive or rare plants are known to occur on the site or immediate vicinity.

North Forest

The north forest is located on the bluff in the north portion of the Fort Lawton site. It is dominated by deciduous tree species, mainly red alder and bigleaf maple. Other tree species present include western red cedar, bitter cherry, black hawthorn and Oregon ash. The tree canopy is a single layer and is estimated as moderately closed (40-69%) overall.

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LEGEND:

- Onsite Habitat Areas
- Offsite Habitat Areas
- Approximate Potential Wetland
- Fort Lawton Site
- Study Area

*Note: Field sketch only.
Features depicted are approximate and not to scale

Source: The Watershed Company, 2017.

Figure 3.2-1
Fort Lawton Existing Biological Resources

The understory of the north forest area is dominated by non-native invasive plant species including English ivy, bindweed, Himalayan blackberry, herb-robert geranium, Scotch broom and knotweed. Some native understory shrubs and groundcover plants are present but they are suppressed by the invasive species. Special habitat features present in the north forest include downed wood, leaf litter and dead parts of live trees. The north forest is a designated Biodiversity Areas and Corridor and a Great Blue Heron breeding area by Washington State Department of Fish and Wildlife (WDFW).

South Forest

The south forest is located at the south end of the site, west of Texas Way and north of Discovery Park Boulevard. This on-site forest connects with forested areas in Discovery Park offsite to the west. The south forest consists of a mix of deciduous and coniferous native trees species including Douglas-fir, bigleaf maple, red alder, Pacific madrone and western red cedar. The canopy is characterized as multi-story and considered closed (70-100%) on average.

Shade-tolerant invasive non-native plants are also present in this forested area. These species include English ivy, English holly, cherry laurel and Himalayan blackberry. Native understory plants include osoberry, red elderberry, beaked hazelnut, native woodland rose, trailing blackberry and swordfern. The south forest is a designated Biodiversity Areas and Corridor by WDFW.

Other Vegetated Areas

Other vegetated areas on the Fort Lawton site are generally maintained or managed landscapes that are often dominated by non-native species. These areas are located adjacent to buildings, roads and parking lots. Vegetation in these areas often consists of either mowed herbaceous plants or small patches of trees that contain little to no understory vegetation. These areas offer relatively little habitat value when compared to other unmaintained forested patches on and near the site.

A narrow strip of native conifer trees is present on the east perimeter of the site, between Texas Way and 36th Ave W. This strip of vegetation, while disturbed and disconnected from other habitat areas, contributes some habitat value to the site as a whole.

Offsite

Discovery Park and Kiwanis Memorial Preserve Park are located within approximately 300 feet of the Fort Lawton site. In general, these city-owned parks contain relatively contiguous forested areas and are dominated by native tree species of varying sizes and ages. Kiwanis Memorial Preserve Park appears to be dominated by deciduous tree species, while forested areas of Discovery Park contain a mix of deciduous and coniferous tree species. Similar to the habitat patches on the site, non-native invasive plants are likely present or prevalent in places within these forested park areas

The parks likely include a variety of special habitat features that wildlife species may use, including downed wood, leaf litter, duff, shrub layer, moss, flowers, lichens, forbs, fungi, underground plant parts, herbaceous layer, snags, dead parts of live trees, tree cavities, bark, large live tree branches, live remnant trees and fruits/seeds/nuts.

Discovery Park and Kiwanis Memorial Preserve Park are designated Biodiversity Areas and Corridors by WDFW. Kiwanis Memorial Preserve Park is also mapped as a Great Blue Heron breeding area. Both parks also contain streams with associated wetlands.

Fish and Wildlife

While the Fort Lawton site is in a largely developed condition, remaining forested habitat functions as a valuable wildlife refuge in a very urban landscape. Potential for wildlife use of the site is increased particularly because of the proximity and connectivity to habitat located in Discovery Park and Kiwanis Memorial Preserve Park.

The variety of wildlife using the habitat on and near the Fort Lawton site is fairly well documented. During breeding point count surveys on the site in winter 2004, a total of 43 bird species were observed. These species consist of a mix of common urban bird species (i.e., American crow, European starling, house sparrow) as well as species more suited to low-density urban environments (i.e., bald eagle, chickadees, juncos, woodpeckers, great blue heron, kinglets, swallows), likely a result of the preservation of large tracts of forest and other habitat areas in Discovery Park to the west.

As stated previously, the north forest onsite and Kiwanis Memorial Preserve Park are considered great blue heron breeding areas by WDFW. They are also mapped as Heron Habitat Areas (with 500-foot buffers) and Wildlife Environmental Conservation Areas (ECAs) by the City of Seattle. In addition, bald eagle breeding areas and a purple martin breeding site are mapped nearby.

Fish are not present on or near the Fort Lawton site due to a lack of fish habitat. Amphibians and reptiles are expected to be uncommon due to the surrounding roads and residences which disconnect on-site habitat from nearby vegetated areas and generally create movement barriers for these types of wildlife species. Terrestrial mammals that are expected to use habitat on and near the site include mice, moles, voles, rats, squirrels, chipmunks, rabbits, raccoons, opossums, coyotes, deer and bats. On occasion, larger mammals have used habitat in Discovery Park, including a cougar in 2009 that was subsequently relocated.

The following sensitive species are either species of local importance or priority species and have been determined to potentially use habitat present on the Fort Lawton site or immediate vicinity. No state- or federally-listed species or federally-designated critical habitat are known to occur on or immediately adjacent to the site.

Great Blue Herons are regulated by the City of Seattle as a species of local importance. They are considered a State Monitored species and Washington State Priority Species by WDFW.

A great blue heron rookery was located in Kiwanis Memorial Reserve Park in the past. Forests of Kiwanis Memorial Reserve Park and the north forest onsite are mapped as breeding areas by WDFW and the City of Seattle. Currently, the nearest known heron rookery is located in Commodore Park next to Salmon Bay, approximately 800 feet from the Fort Lawton site. As of April 2014, the Kiwanis heron colony had abandoned the Kiwanis site due to repeated bald eagle attacks and the colony is not expected to return in the near future. The north forest on the Fort Lawton site could provide nesting habitat for great blue herons, although no nests have been documented onsite.

Pileated Woodpeckers are a State Candidate species and Washington State Priority Species by WDFW. Forests on and near the Fort Lawton site likely support breeding pileated woodpeckers. One individual was observed on the Fort Lawton site during a 2004 bird survey. No nests are known to be present the site but nest sites are possible given the habitat available, particularly if sufficient standing dead wood is retained onsite. Pileated woodpeckers are expected to use habitat on the Fort Lawton site for foraging or traveling.

Purple Martins are a State Candidate species and Washington State Priority Species by WDFW. A breeding site has been mapped approximately 0.3 miles northwest of the Fort Lawton site in Discovery Park. Purple martins forage in open areas on the Fort Lawton site. No nest sites have been documented onsite. However, there is potential for nest sites, presuming pileated woodpecker use of forested habitat and limited competition from more aggressive cavity-nesting species.

Talaris Site

The Talaris site is located in the Laurelhurst neighborhood of Seattle, on the west side of Lake Washington north of Union Bay. The site is currently operated and managed as the Talaris Conference Center. The conference center is situated in a park-like setting which includes a constructed pond, landscaped lawns and natural areas. Natural open spaces nearby include Union Bay Natural Area, Union Bay, and Washington Park Arboretum, all generally located to the south of the site.

Wetland and Streams

Wetland ECAs are mapped by the City on the Talaris site. Based on a past study, one wetland (Wetland 1) has been identified in the southwest portion of the Talaris site (see **Figure 3.2-2**). Wetland 1 is a depressional wetland that contains no outlet and includes emergent and scrub-shrub vegetation classes generally dominated by non-native invasive plant species. Wetland 1 has been rated as a Category II wetland.

A constructed pond is located on the Talaris site. The pond could be considered an artificial wetland and could be exempt from regulation as a critical area. The status of this feature

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LEGEND:

- Offsite Habitat Areas
- Approximate Wetland
- Constructed Pond
- Approximate Bald Eagle Nest
- Approximate Purple Martin Nest
- Talaris Site
- Study Area

*Note: Field sketch only.
Features depicted are approximate and not to scale

Source: The Watershed Company, 2017.

Figure 3.2-2
Talaris Existing Biological Resources

should be verified by the applicable local, state and federal jurisdictions. The pond covers about 0.75 acre.

One off-site wetland (Yesler Swamp) is located approximately 175 feet southwest of the site. Yesler Swamp is assumed to be a Category II/Category I wetland

Given the time that has passed and changes in critical area regulations, the boundaries and classifications of these wetlands will need to be re-verified in accordance with current regulations.

A stream or riparian corridor ECA is mapped by City of Seattle on the Talaris site. A past study of the site indicates that this feature is a large stormwater pipe that lacks fish habitat “upstream” of the site and is therefore not considered a regulated critical area. No other streams are known to exist on the site.

Vegetation

Existing vegetation on the Talaris site is located around buildings, walkways, paved access drives and parking areas. It mainly consists of large landscaped areas with lawns and large trees. The site landscaping has been designated an historic landmark by City of Seattle.

A mix of native and non-native ornamental trees species are present throughout the site including bigleaf maple, red alder, black cottonwood, bitter cherry, willow, western red cedar, Douglas-fir, Lombardy poplar, weeping willow, ornamental pines, and ornamental oaks.

Understory vegetation is generally managed/landscaped except for an area in the southwest portion of the site and along the east property line. These unmaintained areas contain understory vegetation dominated by non-native invasive plant species including Himalayan blackberry, English ivy, field bindweed, bittersweet nightshade, patches of knotweed and scattered English holly. Special habitat features include a few downed logs, stumps and snags overgrown by invasive plants. No sensitive or rare plants are known to occur on or near the site.

Offsite

Yesler Swamp, part of the Union Bay Natural Area, is located southwest of the Talaris site, on the south side of NE 41st Street. This natural area, a former landfill, is situated next to Union Bay and has various habitat types including forested, scrub-shrub and open herbaceous areas interspersed with seasonal and permanent ponds. The various habitat types and ponds attract a variety of birds.

WDFW has recorded a purple martin breeding area near Yesler Swamp and the University of Washington Center for Urban Horticulture. Additionally, the Union Bay Natural Area and associated lake shoreline are expected to provide habitat for other types of wildlife including fish, amphibians, reptiles and some small mammals.

Fish and Wildlife

The Talaris site contains large undeveloped or partially developed areas, and is surrounded by a highly developed urban landscape. The density of vegetation present onsite compared to surrounding areas is high. The onsite vegetation functions as a refuge for urban wildlife species in the area. However, wildlife use is likely limited by the plant species composition and isolation from other habitat areas, noise and other disturbance associated with existing facility operations and pedestrian use of the site.

The most common wildlife species onsite are typically birds and small mammals tolerant of urban natural areas. American crow, Bewick's wren, Steller's jay, black-capped chickadee, house sparrow and northern flicker have been observed onsite. Signs of woodpecker foraging in the southwest portion of the site have also been found. Other wildlife expected on the site include mice, rats, squirrels, raccoons, opossums, bats and a variety of other birds like robins, thrushes, sparrows, towhees, juncos, ducks, hummingbirds and some hawks. Coyote use of the property has been reported.

Native fish are not expected to be present on the Talaris site based on the lack of an above-ground stream feature or natural ponds. The created ponds could support stocked or introduced fish. Amphibians and reptiles are expected to be uncommon onsite due to the surrounding roads and residences that disconnect on-site habitat from nearby vegetated areas and generally create movement barriers to these less mobile wildlife species. However, breeding of some tolerant amphibian species may take place in the pond.

A Fish and Wildlife Habitat Conservation Area (FWHCA) associated with a known Bald Eagle nest site is mapped on the site by the City of Seattle as a wildlife ECA. The nest was observed in a stand of black cottonwoods in the southwest portion of the site. The current status of the nest is unknown, but activity was reported in 2013 and again (although unconfirmed) in 2015. Bald Eagles are no longer listed for protection by state or federal agencies; they have also been recently removed from Washington State's Priority Habitats and Species list. The mapped Wildlife ECA on Talaris is presumably based on the prior status of Bald Eagles as a Priority Species. Since this no longer applies, the City should be consulted to determine how the mapped Wildlife ECA would be regulated. Bald Eagle nests are still protected by the U.S. Fish and Wildlife Service under the Bald and Golden Eagle Protection Act and Migratory Bird Treaty Act.

No federally-listed species or federally-designated critical habitat are known to occur on the site. No other state- species of local importance or priority species are known to use or have a close association with the habitat onsite.

As stated previously, a purple martin breeding area is mapped by WDFW approximately 700 feet southwest of the site in the Union Bay Natural Area. Many other wildlife species are also expected to use the Union Bay Natural Area for some portion of their life cycle. In general, wildlife using habitat in the natural area are not expected to regularly visit the Talaris site due to habitat fragmentation caused by roads and residences. Also, the "park-

like” habitat available onsite, in combination with the regular disturbance that the site receives, precludes use by certain wildlife species present in the Union Bay Natural Area. Purple martins may forage or pass through Talaris while traveling. However, suitable nesting habitat appears to be limited to the Union Bay Natural Area.

(See **Appendix C** for details on existing biological resources.)

3.2.2 Impacts of the Alternatives

An analysis of the potential adverse biological resources impacts of Alternative 1, the Applicant’s Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

Alternative 1 - Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant’s Preferred Alternative)

Fort Lawton Site

Construction

Construction activities on the Fort Lawton site under Alternative 1 would temporarily impact wildlife species within the immediate area. Construction equipment activity and noise could potentially disturb wildlife and habitat. Urban-adapted wildlife that are more tolerant of disturbance (e.g., finch, sparrows, starlings, crows and small mammals) would not likely be displaced but those that are habitat-specific (e.g., birds of prey, woodpeckers and owls) may handle the displacement with difficulty when searching for suitable habitat in otherwise claimed territories. During breeding season, there is a greater potential for permanent loss of species.

There is a potential for erosion and sedimentation of downstream water resources to occur during construction activities. With installation and operation of the proposed temporary stormwater control system on the Fort Lawton site, Alternative 1 is not be expected to significantly impact biological resources downstream.

Operation

Under Alternative 1, 61% of the Fort Lawton site would be retained in open space including passive open space, active open space and landscaped areas (see **Table 2-2**). By comparison, under existing conditions, 45% of the site is open space. Therefore, more of the site would be in open space than at present under this alternative. Existing forested habitat areas in the north and south parts of the site would be preserved in their natural condition with proposed development. Wildlife habitat and corridors for wildlife movement between Kiwanis Memorial Preserve Park and Discovery Park would be preserved with these natural

areas. Up to 4.7 acres of forest land owned by the U.S. Army in the west portion of the site could be dedicated to Discovery Park and could also be preserved as natural area.

Proposed development on the Fort Lawton site under Alternative 1 would include residential buildings, parks/recreation areas, roadways/sidewalks, parking areas and landscaping, primarily in the central portion of the site. The landscaping would likely include a mix of ornamental plant species and native, noninvasive and drought-resistant plantings. Some of the central portion of the site would be in sports fields. The landscaped, more managed habitat would not provide substantial value for most wildlife species. Species adapted to the urban environment would continue to use these areas.

No direct impacts to critical areas (i.e., the potential wetland/stream in the north forest area), vegetation that provides wildlife habitat (in the north and south portions of the site), or sensitive wildlife species (i.e., great blue herons, pileated woodpeckers and purple martins which could use habitats onsite) would be expected at the Fort Lawton site under Alternative 1.

Proposed development under Alternative 1 would indirectly impact retained habitat on the Fort Lawton site due to: increased human activity; building, parking lot and roadway lighting; noise; the potential use of fertilizers, pesticides and herbicides in landscaped areas; and the introduction of “super predators” (e.g., domestic dogs and cats) in residential areas that could impact native wildlife. However, activity, lighting etc. from military use of the site in the past could also have impacted these species.

Stormwater runoff from the site could carry pollutants to downstream water resources. With installation and operation of the proposed permanent stormwater control system on the Fort Lawton site, Alternative 1 is not be expected to significantly impact biological resources downstream.

Talaris Site

Under Alternative 1, the Talaris site would not be redeveloped at this time and biological resources on that site would continue as under existing conditions.

Alternative 2 – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Construction

Temporary impacts to wildlife from construction activities would generally be similar to under Alternative 1 (i.e., due to noise and activity). However, the area and magnitude of construction would be greater under this alternative.

Like Alternative 1, there is a potential for erosion and sedimentation of downstream water resources to occur during construction activities. With installation and operation of the proposed temporary stormwater control system on the Fort Lawton site, Alternative 2 is not be expected to significantly impact biological resources downstream.

Operation

Under Alternative 2, the Fort Lawton site would be developed with market-rate single family housing. Approximately 55% of the site would be in open space, similar to under existing conditions (see **Table 2-2**). However, forested habitat areas onsite would be completely or partially developed under this alternative. No active or passive public parks would be provided at the site under this alternative.

The north forest area would be partially developed and the south forest area would be completely developed with single family residences, landscaping and driveways. Landscaping would likely include a mix of ornamental plant species and native, noninvasive and drought-resistant plantings. The landscaped, more managed habitat would not provide substantial value for most wildlife species. Species adapted to the urban environment would continue to use these areas. The forest land owned by the U.S. Army in the west portion of the site may or may not be dedicated to Discovery Park and preserved as natural area.

Direct impacts to biological resources would be expected at the Fort Lawton site under Alternative 2. If the potential wetland area in the northwest portion of the site is determined to be jurisdictional, current site plans would directly impact the wetland. On-site forested vegetation that provides wildlife habitat would be removed or significantly altered, impacting wildlife species that use these areas. Existing habitat on-site could support breeding populations of great blue herons, pileated woodpeckers and purple martins, although no nest sites have been documented on the site. Bald eagles are present in the vicinity but not likely to nest on the site. Removal and reduction of forested habitat areas and replacement with single family residences would preclude use of on-site habitat by some wildlife species, including the sensitive species listed previously. Also, wildlife currently using these habitat areas would be displaced or lost due to development under Alternative 2.

Similar to Alternative 1, proposed development under Alternative 2 would indirectly impact any remaining habitat due to increased human activity. Building, parking lot and roadway lighting; noise; the potential use of fertilizers, pesticides and herbicides in landscaped areas; and the introduction of domestic dogs and cats in residential areas could impact native wildlife. However, past military use of the site would have had similar indirect impacts to wildlife. Additionally, should the potential wetland be preserved, indirect impacts from smaller buffers and adjacent development could alter the wetland character and ability to support local species.

Like Alternative 1, stormwater runoff from the site could carry pollutants to downstream water resources. With installation and operation of the proposed permanent stormwater control system on the Fort Lawton site, Alternative 2 is not be expected to significantly impact biological resources downstream.

Talaris Site

Construction

Temporary impacts from construction activities could impact wildlife use of the Talaris site, as described for Fort Lawton under Alternative 1 (e.g., due to noise and activity). Conducting construction activities during the nonbreeding season could limit temporary impacts to on-site sensitive wildlife species.

Like Fort Lawton under Alternative 1, there is a potential for erosion and sedimentation of downstream water resources to occur during construction activities. With installation and operation of the proposed temporary stormwater control system on the Talaris site, Alternative 2 is not be expected to significantly impact biological resources downstream.

Operation

Under Alternative 2, the Talaris site would be developed with affordable housing. Some of the housing would occupy existing, renovated buildings, while other housing would be in newly constructed buildings. Approximately 50% of the site would be in open space, less than under existing conditions. The Talaris site landscaping has been designated as an historic landmark by the City of Seattle. As such, much of the existing landscaping, which contributes to the available onsite habitat, would be retained under this alternative.

Preliminary site plans appear to avoid direct impacts to the known wetland area in the southwest portion of the site as well as the constructed pond. Site plans also avoid directly impacting the bald eagle nest tree and area within approximately 150 feet of the nest. Alternative 2 is expected to reduce vegetation/potential habitat areas onsite. However, much of the existing landscaping would be retained. Any removal of vegetation has the potential to impact wildlife species that may use that vegetation for some portion of their life cycle. Redevelopment of the site, with retention of vegetation in the vicinity of wetland and bald eagle habitat areas, could provide opportunities for habitat enhancement through removal of invasive species and replacement with native or noninvasive, drought-tolerant plants.

Proposed development under Alternative 2 at the Talaris site would indirectly impact retained habitat due to increased human activity. Building, parking lot and roadway lighting; noise; use of fertilizers, pesticides and herbicides in landscape would increase under Alternative 2.

Like Alternative 1, stormwater runoff from the site could carry pollutants to downstream water resources. With installation and operation of the proposed permanent stormwater

control system on the Talaris site, Alternative 2 is not be expected to significantly impact biological resources downstream.

Alternative 3 - Public Park Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Construction

Construction activities associated with removal of existing buildings and pavement at the Fort Lawton site have the potential to temporarily disturb wildlife species in the immediate vicinity. Urban-adapted wildlife are more tolerant of disturbance. Less tolerant species may relocate due to noise and activity associated with demolition and construction.

Like Alternative 1, there is a potential for erosion and sedimentation of downstream water resources to occur during construction activities. Erosion potential would be greater given the development in erosion hazard areas (e.g., in the north part of the site). With installation and operation of the proposed temporary stormwater control system on the Fort Lawton site, Alternative 3 is not be expected to significantly impact biological resources downstream.

Operation

Under Alternative 3, the entire Fort Lawton site would be developed as a public park. Approximately 73% of the site would be in open space, more than under existing conditions or Alternative 1 (see **Table 2-2**). Much of the central portion of the site would be in sports fields. Existing forested habitat areas in the north and south parts of the site would be preserved in their natural condition under this alternative. Wildlife habitat and corridors for wildlife movement between the Kiwanis Memorial Preserve Park and Discovery Park would be preserved with these natural areas. Like Alternative 1, up to 4.7 acres of forest land owned by the U.S. Army in the west portion of the site could be dedicated to Discovery Park and could also be preserved as natural area.

No direct impacts to critical areas (i.e., the potential wetland/stream in the north forest area), vegetation that provides wildlife habitat (in the north and south portions of the site) or sensitive wildlife species (i.e., great blue herons, pileated woodpeckers and purple martins which could use habitats onsite) would be expected at the Fort Lawton site under Alternative 3.

Increased recreational use of the site could indirectly impact wildlife use due to increased human activity. Building, parking lot and roadway lighting; noise; and use of fertilizers, pesticides and herbicides in the landscape would increase under Alternative 3. Previous military use of the site would have contributed to these indirect impacts in the past.

Like Alternative 1, stormwater runoff from the site could carry pollutants to downstream water resources. With installation and operation of the proposed permanent stormwater

control system on the Fort Lawton site, Alternative 3 is not be expected to significantly impact biological resources downstream.

Talaris Site

Under Alternative 3, the Talaris site would be developed in the same manner as Alternative 2 and impacts would be as described for Alternative 2.

Alternative 4 – No Action Alternative

Under the No Action Alternative, the Fort Lawton and Talaris sites would not be redeveloped and existing conditions would continue. No impacts to biological resources would be expected at either site.

3.2.3 Mitigation Measures

The following measures have been identified to address the potential impacts on biological resources from construction and operation of the Fort Lawton Project under Alternatives 1, 2 and 3. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

Legally-Required Measures

- On the Fort Lawton site, any wetlands would be delineated, surveyed and rated and appropriate buffers determined per SMC 25.09.160.
- On the Talaris site, the jurisdictional status of the constructed pond and the stormwater pipe/riparian corridor would be confirmed.
- On the Talaris site, the status of the bald eagle nest would be determined.
- On the Fort Lawton site, a great blue heron *Management Plan* would be followed per DPD Directors Rule 5-2007, including:
 - Any clearing, grading or outside construction would be done outside of the nesting season (February 1st through July 31st).
- Coordination with WDFW would be provided when working near nesting habitat associated with known great blue heron breeding areas.

- Significant trees in the development areas of the sites would be identified per SMC Chapter 25.11 and tree protection/replacement measures would be implemented, as applicable.
- Development would be limited to the minimum necessary to meet project needs and mitigation sequencing would be demonstrated, as required by the City.
- Temporary and permanent stormwater control systems would be installed to limit water quality impacts on downstream resources.
- Temporary fencing at wetland buffer edges and around vegetation that provides habitat for sensitive wildlife species (i.e., bald eagle nest area at Talaris and/or forested habitat patches at Fort Lawton) would be installed during construction to protect and preserve these critical areas. Permanent fencing would be maintained at the edges of wetland buffers and at the edges of habitat areas to discourage intrusion by people and pets.
- Mitigation would be provided for any wetland impacts by implementing an approved mitigation plan, per SMC 25.09.065. Any mitigation sites would be maintained and monitored and trees would be retained/installed, as applicable.

Measures Proposed as Part of Project

- Development would be planned in areas that limit impacts to wetlands and their associated buffers and to maximize retention of trees and valuable habitat areas.
- On the Fort Lawton site, the north and south forested patches would be retained to the greatest extent possible to provide natural habitat and corridors for wildlife movement between Kiwanis Memorial Preserve Park and Discovery Park.
- The use of fertilizers, pesticides and herbicides in developed areas would be limited, consistent with the City's ongoing pesticide reduction commitments.
- Native, drought tolerant species would be planted in landscaped areas.
- Lighting would be directed away from natural areas, downcast lighting would be used and night lighting would be limited, where feasible, to limit impacts on wildlife.

Other Possible Measures

- Interpretive signs could be installed and/or information on biological resources could be distributed for public education.

3.2.4 Significant Unavoidable Adverse Impacts

Under Alternatives 1 and 3 at the Fort Lawton site, there could be a permanent minor displacement of certain wildlife species less tolerant of urban uses due to proposed development (e.g., from increased activity levels, use of landscape maintenance products and the introduction of pets). The past military use of the Fort Lawton site could also have impacted these species. Under Alternative 2 at the Fort Lawton site and Alternatives 2 and 3 at the Talaris site, there could be a permanent displacement of certain wildlife species less tolerant of urban uses, due to proposed development (e.g., from the elimination of habitat, as well as increased activity levels, use of landscape maintenance products and the introduction of pets). The existing conference center uses at the Talaris site also likely impact these species. No other significant unavoidable adverse biological resources impacts are anticipated.

3.3 AIR QUALITY/GREENHOUSE GAS EMISSIONS

This section of the DEIS describes air quality and greenhouse gas (GHG) conditions on and near the Fort Lawton and Talaris sites. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified. This section is based on the Air Quality report prepared by Landau Associates in October 2017 (see **Appendix D**).

Key Findings

Near the Fort Lawton and Talaris sites, the largest existing contributor to criteria air pollutants is on-road vehicular traffic. Both sites are located in an attainment area for ozone, NO₂ and PM₁₀ and PM_{2.5} and in a maintenance area for CO, as designated by Ecology and the EPA. There are currently no major sources of GHGs on either site.

Under Alternatives 1, 2, and 3, construction activities could temporarily impact air quality due to increases in fugitive dust, particulate matter, traffic related emissions and soil carbon GHG emissions. Construction activities would comply with Puget Sound Clean Air Agency (PSCAA) regulations and no significant impacts are expected. During operation, Alternatives 1, 2, and 3 would result in an increase in GHG emissions due to increased heating and traffic-related activity. Due to the type and level of development, the air quality impacts from project traffic are not expected to be significant. Alternative 2 is projected to have the highest annual average GHG emissions, at 5,949 MTTCO₂ per year (combined Fort Lawton and Talaris emissions). Alternatives 1 and 3 are projected to have a slightly lower level of annual average GHG emissions, at 4,012 MTTCO₂ per year. Predicted GHG emissions from all the alternatives would fall below Washington State Department of Ecology's threshold of significance; therefore, no significant GHG impacts are anticipated.

Methodology

Current federal, state and local air quality regulations were reviewed to prepare this analysis, including regional U.S. Environmental Protection Agency (EPA) and Washington State Department of Ecology (Ecology) attainment status. Attainment status indicates that air quality in an area meets the National Ambient Air Quality Standards (NAAQS) and non-attainment status indicates that air quality in an area does not meet those standards. Projected air quality impacts resulting from construction and operation of residential and park uses were then estimated and evaluated. The operational impact evaluation considered vehicle miles traveled in association with new development and the associated impact on air quality.

Ecology's "SEPA GHG Calculation Tool" was used to evaluate existing and future buildout GHG emissions for each action alternative. Because GHG emissions result in global rather than localized impacts, GHG emissions from the Fort Lawton and Talaris sites were combined. Three types of life-cycle emissions were estimated using the SEPA GHG Calculation Tool: stationary combustion equipment, energy and transportation. Based on

Ecology's guidance, GHG emissions are presumed to be not significant if a 'business as usual' increase of less than 25,000 metric tons per year of CO_{2e} occurs.

(See **Appendix D** for details on the air quality and GHG emissions analysis methodology.)

3.3.1 Affected Environment

This sub-section describes existing air quality and GHG conditions and regulations applicable to the Fort Lawton and Talaris sites. Air quality/GHG conditions and regulations across King County are generally the same or similar; therefore, the Fort Lawton and Talaris sites are presented together.

Fort Lawton and Talaris Sites

Air Pollution Sources

Typical existing air pollution sources in Seattle include commercial and retail businesses, light industry, residential wood-burning devices (such as woodstoves) and vehicular traffic. On-road vehicular traffic along major roadways and in existing institutional (school, hospital), commercial and residential areas is expected to be the single largest contributor to criteria pollutant emissions. Vehicles contribute most of the carbon monoxide (CO), nitrogen dioxide (NO₂) and GHGs. Stationary equipment used in commercial and industrial areas is a secondary source of emissions and space heating (such as gas and diesel heating equipment) contributes air pollutant emissions as well.

Key Criteria Air Pollutants

The criteria pollutants described below are the six key air pollutants produced in the combustion of fossil fuels and other processes.

Carbon Monoxide

CO is a product of incomplete combustion generated by mobile sources (such as vehicular traffic and heavy equipment), residential wood combustion and industrial sources that burn fuel. Of all pollutants for which short-term health standards exist, CO is emitted in the greatest quantity. The impact of CO is usually limited to the local vicinity of its emission. Since CO is of particular concern with respect to vehicular traffic, the highest ambient concentrations tend to occur near congested roadways and intersections, particularly during wintertime periods of air stagnation.

Ozone

Ozone (O₃) is a highly reactive form of oxygen that is generated by an atmospheric chemical reaction with ozone precursors like nitrogen oxides and volatile organic compounds. These precursors are emitted directly from industrial and mobile sources. Transportation equipment such as automobiles and trucks also significantly contribute to ozone precursor emissions. Elevated ozone concentrations in the atmosphere is a regional

issue rather than a localized problem because the atmospheric reactions take time, and during this delay, ozone precursors may be dispersed far from their point of origin.

Particulate Matter (PM₁₀ and PM_{2.5})

Particulate matter is generated by industrial emissions, residential wood combustion, motor vehicle tailpipes and fugitive dust from roadways, haul roads and unpaved surfaces. There are federal standards for the emission of particulate matter less than or equal to 10 micrometers in size (PM₁₀) and particulate matter less than or equal to 2.5 micrometers in size (PM_{2.5}) because these sizes of particulate matter contribute the most to human health effects and regional haze. The highest ambient concentrations generally occur near the emission sources which in King County would be from residential wood-burning stoves and motor vehicle tailpipes on major roads. PM_{2.5} has a greater impact than PM₁₀ at locations far from the emitting source because it remains suspended in the atmosphere longer and travels farther.

Lead

The main source of lead pollution has historically been the transportation sector but tailpipe lead emissions have drastically declined since the EPA implemented regulations to remove lead from on-road motor vehicle gasoline in 1995. The major emission sources of lead currently include lead smelters and metals processing plants and combustion of aviation gasoline.

Nitrogen Oxides and Sulfur Oxides

Nitrogen oxides (NOx) and sulfur oxides (SOx) are emitted by mobile sources and fuel-burning stationary sources. NOx and SOx pollution from tailpipe emissions form regional haze and acid deposition in the Olympic and Cascade Mountains surrounding Seattle, and NOx is one of the ozone precursors that contribute to ongoing ozone issues in the Puget Sound region.

Greenhouse Gases

GHGs are a group of gases that, when present in the atmosphere, absorb or reflect heat that normally would radiate away from the earth, and thereby increases global temperature. Several GHG constituents are commonly evaluated: Carbon dioxide (CO₂), methane, nitrous oxide, water vapor, O₃ and halocarbons. CO₂ is the individual constituent that is normally emitted in the greatest amount and generally contributes the most to climate change. Each individual constituent has its own global warming potential. To express the average emission rate and global warming potential of the combined constituents, GHG emission rates are commonly expressed as the equivalent amount of carbon dioxide (CO₂e). The effects of GHG emissions are global rather than local, meaning that the amount of GHG emitted is important, but not the specific location of the emissions.

Air Quality Regulations

Three agencies have jurisdiction over ambient air quality on and near the sites: the EPA, Ecology and the Puget Sound Clean Air Agency (PSCAA). The EPA established NAAQS and specified future dates for states to develop and implement plans to achieve these standards. The standards are divided into primary and secondary standards; the former are set to protect human health within an adequate margin of safety and the latter to protect environmental values, such as plant and animal life. Ecology established the Washington State Ambient Air Quality Standards (WAAQS) for the six criteria air pollutants that are at least as stringent as the national standards.

Air Quality Attainment Status

Based on monitoring information collected over a period of years, the EPA and Ecology designate regions as being attainment or non-attainment areas for regulated air pollutants. If the measured concentrations in a non-attainment area improve so they are consistently below the NAAQS, Ecology and the EPA can reclassify the non-attainment area to a maintenance area.

King County is designated an attainment area for ozone, NO₂ and PM₁₀ and PM_{2.5}. The County is designated in a maintenance area for CO.

Puget Sound Regional Council Transportation Conformity Analysis

Within the region, all federal- or state-funded, significant transportation projects (including constructing or widening roadways and signalized intersections) that are proposed within non-attainment or maintenance areas are subject to the Transportation Conformity Regulations. These regulations ensure that transportation projects, plans and programs will conform to existing plans and timetables for attaining or maintaining NAAQS. The Fort Lawton and Talaris sites are located in a maintenance area for CO and ozone.

Puget Sound Clean Air Agency Regulations

All construction sites in the Puget Sound region are required to implement rigorous emission controls to minimize fugitive dust and odors during construction, as required by PSCAA Regulation 1, Section 9.15, Fugitive Dust Control Measures.

Climate Change Policy

National Environmental Policy Act Requirement for Climate Change Analysis - In 2010, the Council on Environmental Quality issued draft National Environmental Policy Act (NEPA) guidance on the consideration of the effects of climate change and GHG emissions. This guidance advises federal agencies to consider opportunities to reduce GHG emissions caused by federal actions, adapt their actions to climate change impacts throughout the NEPA process and address these

issues in their agency NEPA procedures. This guidance does not set numerical thresholds for what levels of GHG emissions would constitute a significant impact, nor does it specify what types of mitigation measures should be required by local municipalities.

State of Washington Greenhouse Gas Requirements - In 2007, Executive Order 07-02 was issued establishing several GHG reduction goals, including reducing emissions to 1990 levels by 2020, 25 percent below 1990 levels by 2035 and 50 percent below 1990 levels by 2050.

In 2011, the Washington State Department of Commerce released an updated Washington State Energy Strategy for 2012, which includes short- and long-term policy options to maintain competitive energy prices; increase competitiveness by fostering a clean energy economy and jobs; and meet the state's obligations to reduce GHG emissions. The Strategy outlines strategies to meet these goals in terms of transportation efficiency, building efficiency, distributed energy and pricing.

In 2016, Ecology adopted emission standards (Chapter 173-442 WAC – Clean Air Rule) to cap and reduce GHG emissions from significant stationary sources, petroleum product producers, importers and distributors and natural gas distributors.

Puget Sound Clean Air Agency and Greenhouse Gases - In 2004, the PSCAA published its strategy document for climate change, entitled Roadmap for Climate Protection: Reducing GHG Emissions in Puget Sound.¹ In this strategy, the PSCAA recommends a broad range of GHG reduction measures including regional vehicle trip reduction, building energy efficiency improvements, solid waste reduction, forestry and agriculture practice improvements and community education. This strategy also encourages local municipalities to implement their own GHG reduction measures.

City of Seattle Climate Change Policies - In 2013, the City of Seattle adopted Resolution 31447, the Seattle Climate Action Plan. Additionally, in 2013, Seattle published the Seattle Climate Action Plan Implementation Strategy. The strategy provides a framework that focuses on reducing GHG emissions in road transportation, building energy and waste sectors of the economy.

The *Seattle 2035 Comprehensive Plan* outlines the City's goal of reducing GHG emissions by 58% from 2008 levels by 2030 and becoming carbon-neutral by 2050. The Comprehensive Plan also outlines policies related to transportation, building energy, waste and the food system that are aimed at reducing the emission of GHGs.

(See **Appendix D** for details on existing air quality and GHG emissions conditions and regulations.)

¹ Puget Sound Clean Air Agency, 2004.

3.3.2 Impacts of the Alternatives

An analysis of the potential adverse air quality and GHG impacts of Alternative 1, the Applicant's Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant's Preferred Alternative)

Fort Lawton Site

Construction

Under Alternative 1, clearing and grading activities, demolition of most of the existing structures and construction of new infrastructure and housing and park uses through project buildout in approximately 2025 could cause temporary increases in the ambient concentrations of fugitive dust and suspended particulate matter. Construction activity would comply with PSCAA regulations to minimize dust emissions. Therefore, no significant construction impacts are expected.

Construction activities would likely require the use of diesel-powered, heavy trucks and smaller equipment such as generators and compressors. These engines would emit air pollutants that could slightly degrade local air quality in the immediate vicinity of the activity. However, these emissions would be temporary and localized and the resulting construction tailpipe emissions would likely be far outweighed by emissions from existing traffic in the region. No significant impacts are expected.

Some construction activities could cause detectable odors in the Fort Lawton vicinity, especially during paving operations using tar and asphalt. Such odors would be short-term and localized. Stationary equipment used for construction must comply with PSCAA regulations requiring the best available measures to control the emissions of odor.

Construction equipment and material hauling could temporarily increase traffic flow on city streets adjacent to a construction area. If construction delays traffic enough to significantly reduce travel speeds in the area, general traffic-related emissions would increase.

Development would also require removal of some existing vegetation, which would lead to soil carbon GHG emissions. However, wooded areas in the north and south parts of the Fort Lawton site would be preserved and forest land in the west portion of the site could be dedicated to the adjacent Discovery Park. Overall, more vegetated area would be created in the form of landscaping, passive and active open space, than would be removed, resulting in a net increase in vegetation on the site and less soil carbon GHG emissions.

Operation

Air quality impacts that could result from residential development under Alternative 1 would include heating, wood-burning and transportation-related impacts; park uses would result in transportation-related impact, as described below.

Mobile Source Air Toxics

Development would include the addition of roadways and improvements to existing roadways. When a street is widened and moves closer to receptors, the localized level of mobile source air toxics emissions could be higher. On a regional basis, the EPA's vehicle and fuel regulations (coupled with ongoing future fleet turnover) will over time cause substantial reductions that will cause region-wide mobile source air toxics levels to be significantly lower than today in most cases. Therefore, development under Alternative 1 is not expected to generate significant levels of mobile sources of air toxic emissions.

Emissions from Vehicle Travel

Tailpipe emissions from vehicles traveling on public roads would be the major source of air pollutant emissions associated with development under Alternative 1. Potential air quality impacts caused by increased tailpipe emissions are divided into two general categories: CO hotspots caused by localized emissions at heavily congested intersections and regional photochemical smog (the regional haze produced by ozone and fine particles) caused by combined emissions throughout the Puget Sound region.

Development under Alternative 1 would increase vehicle travel on existing public roads. However, it is unlikely that the increased traffic and congestion would cause localized air pollutant concentrations at local intersections to form a hotspot (i.e., a localized area where air pollutant concentrations exceed NAAQS).

EPA motor vehicle regulations have steadily decreased tailpipe emissions from individual vehicles. Continuing decreases from individual vehicle emissions are expected to more than offset the increase in vehicle traffic, leading to a decrease in total GHG emissions from transportation sources, even as populations increase. For these reasons, it is unlikely that air quality impacts from Alternative 1 at local intersections would be significant.

When added to other growth in the region, the increased emissions caused by development under Alternative 1 could slightly contribute to worsening of regional air quality. However, the change in tailpipe emissions would be very small relative to the overall regional tailpipe emissions in the Puget Sound air basin. Because the change in tailpipe emissions associated with Alternative 1 is expected to be small compared to the overall tailpipe emissions in region and because the region is currently designated an attainment area, Alternative 1 would not result in a significant impact on regional air quality.

Space Heating Emissions at Residential Buildings

Emissions would be generated by natural gas at new dwellings. However, per-building space heating emissions are expected to decrease in response to energy conservation code advancements. Therefore, future space heating emissions at the Fort Lawton or Talaris sites are not expected to cause significant air quality impacts in the Puget Sound region.

Residential Wood Burning

Residential wood-burning appliances elevate concentrations of particulate matter and toxic air pollutants especially when heavy wood burning is combined with stagnant weather conditions. The ambient air pollutant concentrations caused by residential wood combustion generally occur in the immediate vicinity of the wood-burning appliance. Wood-burning appliances would not be included in the housing under Alternative 1.

The PSCAA and Washington State have regulations in place to improve regional air quality by limiting PM_{2.5} emissions from woodstoves. Continued enforcement of these regulations and policies would ensure that future emissions from residential wood combustion would prevent ambient pollutant concentrations in heavily populated areas from approaching health-based NAAQS limits. Therefore, no significant impacts are anticipated.

Greenhouse Gas Emissions

Projected buildout (2025) GHG emissions for each of the EIS alternatives is presented in **Table 3.3-1**. As mentioned previously, because GHG emissions result in global rather than localized impacts, estimates from the Fort Lawton and Talaris sites have been combined. Three types of life-cycle emissions are included in these calculations: stationary combustion equipment, energy and transportation.

As shown in the **Table 3.3-1**, the projected average annual GHG emissions under Alternative 1 is estimated to be 4,012 metric tons CO_{2e} per year. This is well below Ecology's threshold of significant impacts of over 25,000 metric tons CO_{2e} per year. Therefore, no significant impacts are expected. Note that the GHG emissions under Alternative 1 are from the Fort Lawton site only, as the Talaris site is not included in the project under this alternative.

Talaris Site

Under Alternative 1 the Talaris site would not be redeveloped. Air quality and GHG conditions on and near the site would continue as under existing conditions.

Table 3.3-1
COMPARISON OF ANNUAL GHG EMISSIONS – EIS ALTERNATIVES

GHG Emissions Estimates	Projected Average Annual GHG Emissions (metric tons CO _{2e} per year)			
	Alt 1	Alt 2	Alt 3	Alt 4 (NA)
Forecast Emissions				
Emissions (Stationary Combustion)	965	1,415	965	0
Emissions (Electricity)	929	1,541	929	0
Emissions (Transportation)	2,118	2,993	2,118	0
Total Emissions	4,012	5,949	4,012	0

Source: Landau Associates, 2017.

Alternative 2 – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

In general, air quality and GHG impacts under Alternative 2 would be similar to but greater than under Alternative 1 due to residential development occurring on both the Fort Lawton and Talaris sites. As shown in **Table 3.3-1**, combined GHG emissions from development at both sites is estimated at 5,949 metric tons CO_{2e} per year which is higher than the other alternatives, but below the threshold of significance (25,000 metric tons CO_{2e} per year). Alternative 2 would also result in more overall vehicle travel and vehicle-related emissions than Alternative 1 because housing would be built on both the Fort Lawton and Talaris sites. As with Alternative 1, it is unlikely that the increased traffic and congestion would cause localized air pollutant concentrations at local intersections to form a hotspot.

Fort Lawton Site

Construction

Temporary localized air emissions from construction activities (clearing/grading, demolition of all structures and construction of residences) could occur through project buildout in approximately 2025, similar to the impacts described under Alternative 1. Construction activity would comply with PSCAA regulations to minimize dust emissions. Therefore, no significant construction impacts are expected.

Operation

Air quality impacts associated with operation of market-rate residential development on the Fort Lawton site under Alternative 2 would be similar to Alternative 1, and significant levels of mobile sources of air toxic emissions, space heating emissions and residential wood burning emissions are not anticipated.

Talaris Site

Construction

Temporary air quality impacts through project buildout under Alternative 2 would result from clearing/grading, construction of homes and renovation of buildings throughout the Talaris site; there would be no demolition of existing structures. Construction activity would comply with PSCAA regulations to minimize dust emissions. Therefore, no significant construction impacts are expected.

Operation

Air quality impacts related to operation of affordable housing on the Talaris site would be similar to those described for the Fort Lawton site under Alternative 1.

Alternative 3 - Public Park Onsite; Affordable/Homeless Housing Offsite

In general air quality impacts under Alternative 3 would be similar to Alternative 1. As shown in **Table 3.3-1**, combined GHG emissions from development at both sites is estimated to be the same as Alternative 1 (4,012 metric tons CO_{2e} per year). This is well below Ecology's threshold of significant impacts of over 25,000 metric tons CO_{2e} per year. Alternative 3 would result in more overall vehicle travel and vehicle-related emissions than Alternative 1 because dwelling units would be built on the Talaris site and active and passive open space uses at the Fort Lawton site. As with Alternative 1, it is unlikely that the increased traffic and congestion would cause localized air pollutant concentrations at local intersections to form a hotspot.

Fort Lawton Site

Construction

Temporary construction air quality impacts through project buildout in approximately 2025 under Alternative 3 would result from clearing/grading, demolition of most of the structures and construction of parks and recreation uses throughout the Fort Lawton site. Impacts would be similar to but less than those described for Alternative 1 since construction of new residential development would not occur. Construction activity would comply with PSCAA regulations to minimize dust emissions. Therefore, no significant construction impacts are expected.

Operation

Air quality impacts associated with operation of park and recreational uses on the Fort Lawton site under Alternative 2 would be similar to under Alternative 1, and significant levels of mobile sources of air toxic emissions, space heating emissions and residential wood burning emissions are not anticipated.

Talaris Site

Under Alternative 3, the Talaris site would be developed in the same uses as under Alternative 2 and air quality impacts would also be the same.

(See **Appendix D** for details on potential air quality and GHG impacts under Alternatives 1, 2 and 3.)

Alternative 4 – No Action Alternative

Under Alternative 4, no redevelopment of the Fort Lawton or Talaris sites would occur at this time. Existing air quality conditions would continue and no new project-related air quality or GHG emissions would be generated.

3.3.3 Mitigation Measures

The following measures have been identified to address the potential impacts on air quality and GHGs from construction and operation of the Fort Lawton Project under Alternatives 1, 2 and 3. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

Legally-Required Measures

- PSCAA regulations to minimize fugitive dust and odor during construction would be implemented.
- All development would comply with applicable air quality regulations, including NAAQS, State Ambient Air Quality standards, PSCAA's and Ecology's indoor burning regulations, PSCAA's outdoor burning regulations and State of Washington GHG laws.

Measures Proposed as Part of Project

- Construction contractors would implement air quality control plans for construction activities. A dust control plan would be prepared that would require construction crews to implement all reasonable control measures described in the *Guide to Handling Fugitive Dust from Construction Projects*.² Air quality control plans would include best management practices (BMPs) to control fugitive dust and odors emitted by diesel construction equipment.

² Associated General Contractors of Washington and Fugitive Dust Task Force 1997.

- Housing developed on the Fort Lawton or Talaris sites would comply with the Evergreen Sustainable Development Standards (ESDS), which include the following GHG reduction measures:
 - Walkable neighborhoods (resulting in lower transportation-related emissions); and
 - Reductions in energy use and increased insulation (resulting in lower emissions related to space heating).
- Under Alternatives 1 and 3, sidewalks and trails would be located throughout the site that would provide opportunities for non-motorized circulation and reduce vehicular emissions.
- Under Alternatives 1 and 3, King County Metro transit bus stops would be provided at two locations along Texas Way West on the Fort Lawton site to encourage mass-transit use between the site and off-site locations and reduce the number of vehicular miles travelled.

3.3.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts on air quality or GHGs are anticipated.

3.4 NOISE

This section of the DEIS describes the noise conditions on and near the Fort Lawton and Talaris sites. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified. The section is based on the Noise report prepared by Landau Associates in October 2017 (see **Appendix E**).

Key Findings

The Fort Lawton site is currently vacant; existing sources of noise are limited to wildlife and occasional maintenance. Sources of noise on the Talaris site are from conference center uses and wildlife. Noise sources adjacent to both sites include traffic travelling on nearby roads, residential uses and in the case of the Talaris site, institutional uses (i.e., Children's Hospital).

During construction, Alternatives 1, 2, and 3 would result in a temporary increase in noise due to the use of heavy equipment and the hauling of construction materials. During operation, increases in traffic noise are expected to result from all development alternatives, with Alternatives 1 and 3 generating a larger increase in traffic noise than the other alternatives. Operational noise is anticipated to be highest under Alternative 3 with three multi-purpose fields, followed by Alternative 1 with two multi-purpose fields. Under Alternative 2, the increase in operational noise generation is expected to be minimal. Increases in noise under all the development alternatives are not anticipated to be significant relative to City and State regulatory criteria.

Methodology

Terminology used in the noise analysis include A-weighted decibel (dBA) and equivalent sound level (Leq) as described below. Noise can be described as unwanted sound. A frequency-dependent rating known as the dBA scale relates noise to human hearing sensitivity. This scale accounts for the human perception of a doubling of loudness as an increase of 10 dBA. Most people under normal listening conditions would probably perceive a 5 dBA change in noise of a similar nature. A measure used to represent the average sound energy occurring over a specified time period is Leq. Leq is the steady-state sound level that would contain the same acoustical energy as the time-varying sound that actually occurs during the monitoring period. The 1-hour A-weighted equivalent sound level (Leq 1 h) is the energy average of A-weighted sound levels occurring during a 1-hour period.

Noise-sensitive receiver locations considered for the noise evaluation include existing nearby residences and parks and planned residences, parks and community gathering places located throughout the study area, which includes Discovery Park, Kiwanis Memorial Preserve Park and residential areas adjacent to the Fort Lawton site (see **Figure**

3.4-1, Fort Lawton Noise Sensitive Receivers) and residential areas adjacent to the Talaris site (see **Figure 3.4-2**, Talaris Noise Sensitive Receivers).

The temporary impacts of noise from construction and long-term impacts of noise from residential land use and park uses are evaluated. Local on-site roadway noise was qualitatively analyzed. The Federal Highway Administration Traffic Noise Model Version 2.5 (USDOT FHWA 2004) was used to predict existing and future noise levels during peak hours.

Traffic noise impacts caused by increased traffic on the following roads adjacent to the Fort Lawton site were evaluated for the existing homes, parks and noise-sensitive receivers:

- Texas Way (Fort Lawton Cemetery and Kiwanis Memorial Preserve Park: R-2);
- 40th Avenue West (Existing Residence: R-1);
- West Government Way (Existing Residences: R-3 and R-5); and
- 34th Avenue West (Existing Residence: R-4).

Traffic noise impacts caused by increased traffic on the following roads adjacent to the Talaris site were evaluated for the existing homes and noise-sensitive receivers:

- Mary Gates Memorial Drive NE (University of Washington Sports Field: Field);
- NE 41st Street (Existing Residence: R-1); and
- NE 45th Street (Existing Residence: R-2).

Potential noise impacts are compared to City of Seattle and Washington State noise regulatory criteria.

(See **Appendix E** for details on the noise analysis methodology.)

3.4.1 Affected Environment

This sub-section describes existing noise conditions on and near the Fort Lawton and Talaris sites.

Fort Lawton Site

The Fort Lawton site is currently a vacant former Army Reserve center; the only existing sources of noise are wildlife that use the site and occasional maintenance of the facilities. Existing noise sources near the site include activities associated with residential and park uses (e.g., in the Magnolia neighborhood, and at Discovery Park and Kiwanis Memorial Reserve Park) and traffic traveling on adjacent roadways (e.g., W Government Way, Texas Way W, 36th Avenue W and W Lawton Street).

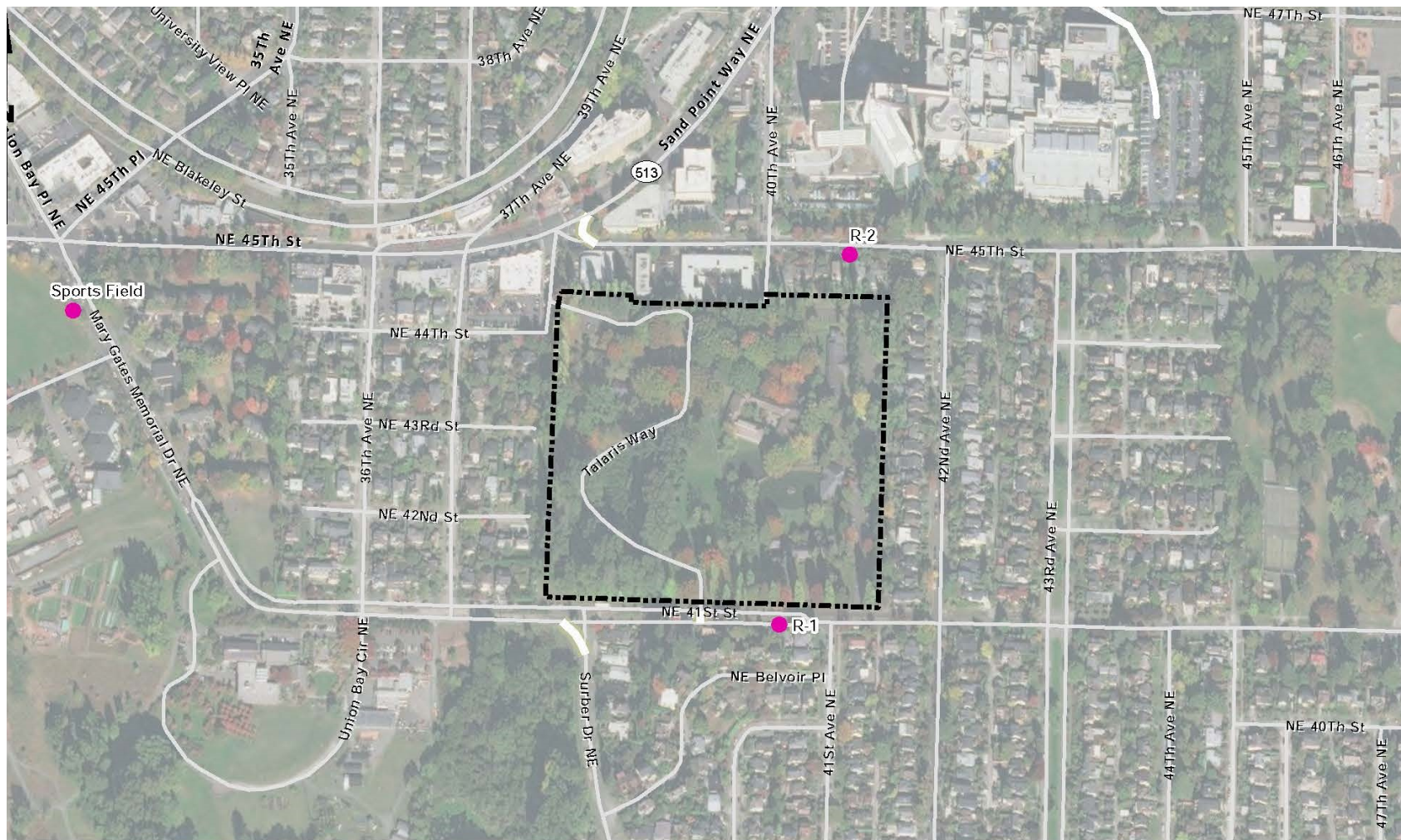
Fort Lawton Army Reserve Center Redevelopment Project Draft Environmental Impact Statement



Source: Landau Associates, 2017.

Figure 3.4-1
Fort Lawton Noise Sensitive Receptors

Fort Lawton Army Reserve Center Redevelopment Project Draft Environmental Impact Statement



Legend

- Receiver Location
- ▭ Project Area

Note: This figure is not to scale



Source: Landau Associates, 2017.

Figure 3.4-2

Talaris Noise Sensitive Receptors

Table 3.4-1 lists the modeled daytime Leq noise levels at each representative receiver location near the Fort Lawton site for existing conditions in 2017, as well as the traffic-related noise levels under Alternatives 1 through 4 in 2030. (2030 corresponds to the future analysis year in the transportation analysis for the project, and is consistent with the future planning year used by the City of Seattle.)

Talaris Site

The Talaris site is currently used as a conference center in a park-like setting. Existing sources of noise on the site are from the conference center attendees and staff and wildlife that use the site. Existing noise sources near the site include activities associated with residential, institutional and commercial uses (e.g., in the Laurelhurst neighborhood, Children’s Hospital and commercial uses along Sandpoint Way), and traffic traveling on adjacent roadways (e.g., NE 45th Street, 42nd Avenue NE, NE 41st Street and 38th Avenue NE).

Table 3.4-1 lists the modeled daytime Leq noise levels at each representative receiver location near the Talaris site for the existing conditions in 2017, as well as the traffic-related noise levels under Alternatives 1 through 4 in 2030.

Table 3.4-1
ESTIMATED TRAFFIC-RELATED NOISE LEVELS – EIS ALTERNATIVES

Representative Receiver Location	Modeled Noise Impact in dBA				
	Existing (2017)	Difference from No-Action Alternative			Alt 4 No Action (2030)
		Alt 1 (2030)	Alt 2 (2030)	Alt 3 (2030)	
Fort Lawton					
Cemetery	48	4	1	4	49
R-1	56	2	1	1	56
R-2 / Kiwanis Park	47	4	1	4	48
R-3	61	2	<1	2	62
R-4	62	1	<1	1	62
R-5	64	<1	<1	<1	65
Talaris					
Field	64	-	<1	<1	64
R-1	59	-	<1	<1	60
R-2	63	-	<1	<1	64

Source: Landau Associates, 2017.

Note: Alternative 1 includes no development at the Talaris site; therefore, no project-related changes in traffic volume are forecast. Development at the Talaris site is identical under Alternatives 2 and 3; therefore, project-related traffic volumes are forecast to be the same under both alternatives.

Noise impacts are rounded to the nearest whole decibel, consistent with WSDOT traffic noise modeling guidance. Values indicated as “<1” not shown due to rounding.

3.4.2 Impacts of the Alternatives

An analysis of the potential adverse noise impacts of Alternative 1, the Applicant's Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant's Preferred Alternative)

Fort Lawton Site

Construction

Clearing and grading activities, demolition of most of the existing structures, and construction of new infrastructure and housing through project buildout in approximately 2025 would be accompanied by temporary increases in noise due to the use of heavy equipment and hauling of construction materials. Noise impacts would depend on the background sound levels, the type of construction equipment being used and the amount of time it is in use. The project would adhere to the limits for construction activity within residential zones in SMC Chapter 25.08.425. Therefore, no significant impacts are expected during construction.

Operation

Alternative 1 would result in increased traffic on local roadways and associated noise within and around the Fort Lawton site. Noise impacts from traffic on local roadways is shown in **Table 3.4-1**. The largest traffic noise impacts are expected to occur along Texas Way W due to the low volume of existing traffic along this road and the relatively high volume of project-related traffic that is expected. However, the modeled peak-hour traffic noise increase at full buildout would not exceed the Washington State Department of Transportation (WSDOT) substantial increase impact threshold of 10 dBA at any of the representative receiver locations under Alternative 1. Therefore, traffic-related noise is not expected to be significant.

Operational noise under Alternative 1 would be generated by multi-family residential, parks/recreation, senior support service, and maintenance facility uses at the Fort Lawton site. Noise associated with residences and senior support service offices is expected to be minimal. Active open space can produce noise associated with maintenance and amplified and unamplified human voices, which is regulated by Chapter 25.08.490 of the SMC. As a result, no significant impacts are expected. Under Alternative 1, existing wooded areas in the north, south and west parts of the Fort Lawton site would be preserved in forest. Vegetation along the east edge of the Fort Lawton site would be maintained and potentially enhanced as necessary to serve as a noise buffer between the site and the adjacent Magnolia neighborhood under this alternative. Woodland and vegetated buffers

would assist in reducing the impacts of noise from the site on the surrounding area. Therefore, operational noise is not expected to be significant.

Talaris Site

Under Alternative 1 the Talaris site would not be redeveloped. Noise sources on and near the site would continue as under existing conditions and no additional noise impacts are expected.

(See **Appendix E** for details on potential noise impacts under Alternative 1.)

Alternative 2 – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Construction

Temporary construction noise impacts through project buildout under Alternative 2 would be like under Alternative 1 and would result from clearing/grading, demolition of all the existing structures and construction of homes throughout the Fort Lawton site. With adherence to the limits for construction activity in SMC Chapter 25.08.425, no significant impacts are expected.

Operation

Similar to Alternative 1, Alternative 2 would result in increased traffic on local roadways and associated noise within and around the Fort Lawton site. Noise impacts from traffic on local roadways are shown in **Table 3.4-1**. Traffic noise at representative receiver locations near the Fort Lawton site is expected to range from less than 1 to 1 dBA which is lower than under Alternative 1 due to the smaller increase in traffic volume forecast for this alternative. Like Alternative 1, modeled peak-hour traffic noise increase at full buildout would not exceed the WSDOT substantial increase impact threshold of 10 dBA at any of the representative receiver locations under Alternative 2. Therefore, traffic-related noise is not expected to be significant.

Operational noise under Alternative 2 would be generated by the single-family residences at the Fort Lawton site. Noise associated with these residences is expected to be minimal. No active open spaces and their associated noise are planned for the Fort Lawton site under this alternative. Therefore, operational noise is not expected to be significant.

Talaris Site

Construction

Temporary construction noise impacts through project buildout under Alternative 2 would result from clearing/grading, construction of homes and renovation of existing buildings throughout the Talaris site. There would be no demolition of existing structures. With

adherence to the limits for construction activity in SMC Chapter 25.08.425, no significant impacts are expected.

Operation

Similar to the Fort Lawton site under Alternative 1, development under Alternative 2 would result in increased traffic on local roadways and associated noise within and around the Talaris site. Noise impacts from traffic on local roadways are shown in **Table 3.4-1**. Traffic noise under Alternative 2 would increase by less than 1 dBA above the No-Action Alternative; the increase in noise under Alternative 2 would be the result of higher traffic volumes associated with the proposed multi-family development. The modeled peak-hour traffic noise increase at full buildout would not exceed the WSDOT substantial increase impact threshold of 10 dBA at any of the representative receiver locations under Alternative 2. Therefore, traffic-related noise is not expected to be significant.

Operational noise under Alternative 2 would be generated by multi-family residential and senior support service uses at the Talaris site. Noise associated with these uses is expected to be minimal. No active use of open spaces and their associated noise are planned for the Talaris site under this alternative. Therefore, operational noise is not expected to be significant.

(See **Appendix E** for details on potential noise impacts under Alternative 2.)

Alternative 3 - Public Park Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Construction

Temporary construction noise impacts through project buildout under Alternative 3 would result from clearing/grading, demolition of most of the structures and construction of parks and recreation uses throughout the Fort Lawton site. With adherence to the limits for construction activity in SMC Chapter 25.08.425, no significant impacts are expected.

Operation

Similar to Alternative 1, development under Alternative 3 would result in increased traffic on local roadways and associated noise within and around Fort Lawton site. Noise impacts from traffic on local roadways under Alternative 3 at the Fort Lawton site are shown in **Table 3.4-1**. Traffic noise level increase is expected to range from less than 1 to 4 dBA, which is higher than Alternatives 2 or 4 due to the multi-use fields which are expected to draw larger volumes of traffic during peak PM hours. The increase of traffic noise associated with Alternative 3 is expected to be like the increase under Alternative 1, except at receiver location R-1 where the increase associated with Alternative 3 would be slightly less. Like Alternative 1, modeled peak-hour traffic noise increase at full buildout would not exceed the WSDOT substantial increase impact threshold of 10 dBA at any of

the representative receiver locations under Alternative 3. Therefore, traffic-related noise is not expected to be significant.

Operational noise from Alternative 3 would be generated by the active and passive open space uses at the Fort Lawton site. Active open space would produce noise associated with maintenance and amplified and unamplified human voices. The noise generated by the parks/recreation uses would be greater than under Alternative 1, because there would be one additional multipurpose field. With adherence to the regulations in Chapter 25.08.490 of the SMC, no significant impacts are expected. Similar to Alternatives 1, existing wooded areas in the north, south and west parts of the Fort Lawton site would be preserved in forest. Vegetation along the east edge of the Fort Lawton site would be maintained and potentially enhanced as necessary to serve as a noise buffer between the site and the adjacent Magnolia neighborhood under this alternative as well. Woodland and vegetated buffers would assist in reducing the impacts of noise from the site on the surrounding area. Therefore, operation noise is not expected to be significant.

Talaris Site

The potential noise impacts of Alternative 3 at the Talaris site would be the same as described under Alternative 2 because the same development is proposed.

(See **Appendix E** for details on potential noise impacts under Alternative 3.)

Alternative 4 – No Action Alternative

Under Alternative 4, no development is proposed for the Fort Lawton or Talaris sites at this time. No temporary clearing/grading, demolition or construction noise would occur. Local roadway noise is expected to increase slightly through 2030 to correspond with an expected one percent per year increase in traffic volumes resulting in a modeled increase of noise associated with traffic ranging from less than 1 to 1 dBA, which would not exceed the WSDOT substantial impact threshold of 10 dBA at any of the representative receiver locations. No new project-related operational noises would occur.

3.5.3 Mitigation Measures

The following measures have been identified to address the potential noise impacts from construction and operation of the Fort Lawton Project under Alternatives 1, 2 and 3. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

Legally-Required Measures

- Construction activities would be limited to between the hours of 7 AM and 10 PM during weekdays, and between the hours of 9 AM and 10 PM on weekends and legal holidays to comply with applicable state and local regulations.
- The noise associated with maintenance and amplified/unamplified human voices in the active open space under Alternatives 1 and 3 would adhere to the regulations in SMC 25.08.490.

Measures Proposed as Part of Project

- To minimize construction noise at nearby receivers, the following mitigation measures would be incorporated into construction plans and contractor specifications:
 - Locate stationary equipment away from receiving properties;
 - Erect portable noise barriers around loud stationary equipment located near sensitive receivers;
 - Turn off idling construction equipment;
 - Require contractors to rigorously maintain all equipment; and
 - Train construction crews to avoid unnecessarily loud actions (e.g., dropping bundles of rebar onto the ground or dragging steel plates across pavement) near noise-sensitive areas.
- Under Alternatives 1 and 3, existing wooded areas in the north, south, and west parts of the Fort Lawton site would be preserved in forest. Vegetation along the east edge of the Fort Lawton site would be maintained and potentially enhanced as necessary to serve as a noise buffer between the site and the adjacent Magnolia neighborhood under these alternatives as well. Woodland and vegetated buffers would assist in reducing the impact of noise from the site on the surrounding areas.

3.5.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse noise-related impacts are expected.

3.5 ENVIRONMENTAL HEALTH

This section of the DEIS describes the environmental health conditions on and near the Fort Lawton and Talaris sites. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified. This section is based on the review of several technical reports on the sites (see **Appendix F** for a complete list and summaries of these reports).

Key Findings

Potential environmental health hazards are present at the Fort Lawton site, including asbestos, lead-based paint and PCBs in existing buildings, and possibly undiscovered underground storage tanks or contaminants. Buildings on the Talaris site could also contain asbestos, lead-based paint and PCBs. A former landfill is located near the Talaris site. However, there is minimal potential for methane migration onto the site.

Under Alternatives 1 and 3, all existing buildings except Building 245 would be removed on the Fort Lawton site. Under Alternative 2, all existing buildings would be removed on the Fort Lawton site. Under Alternatives 2 and 3, all existing buildings on the Talaris site would be retained and repurposed. During construction of Alternatives 1, 2 and 3, impacts could include air pollutants from dust or vehicle emissions, exposure to hazardous materials and/or accidental spills of construction-related chemicals. During operation of all the development alternatives, environmental health impacts could result from the improper use and disposal of household chemicals, such as cleaners and fertilizers; operational impacts are anticipated to be less under Alternative 3 due to fewer residential units than the other alternatives. With the implementation of a site-specific health and safety plan and a SWPPP, no significant environmental health impacts are expected.

Methodology

Relevant technical reports were reviewed to assess the environmental conditions/hazards at the Fort Lawton and Talaris sites and vicinities. Based on this information, conclusions were reached related to the potential for hazardous substances to be present on the sites and for proposed redevelopment under the EIS alternatives to disturb these substances and potentially cause environmental health impacts.

3.5.1 Affected Environment

This sub-section describes existing and historic land uses on and near the Fort Lawton and Talaris sites and identifies the known presence or potential presence of contaminants and/or hazardous materials on the sites.

Fort Lawton Site

In 1896, the Fort Lawton Military Reservation was established as an artillery battery intended to defend the city of Seattle and South Puget Sound from naval attack. The reservation consisted of over 1,100 acres and in 1900 was officially designated Fort Lawton. The artillery firing pieces were not installed and in 1902 the fort was converted to infantry use.

The current Fort Lawton site is situated on approximately 34 acres of the former military reservation and contains the following six buildings which are vacant and in caretaker status:

- Harvey Hall (Building 216) built in 1958;
- Leisy Hall (Building 220) built in between 1968 and 1972;
- Area Maintenance Support Activity (AMSA, Building 222) built in 1968;
- Maintenance Building (Building 211) built around 1958;
- Maintenance Building (Building 214) built in the late 1990s; and
- Organizational Maintenance Shop (OMS, Building 245) built in 1999.

Due to the age of some of the buildings, asbestos containing materials (ACM), lead-based paint (LBP) and polychlorinated biphenyls (PCBs) are potentially present. Other past activities and facilities associated with the former military reservation could also have resulted in the release of contaminants to the soil and groundwater (e.g., from underground and aboveground storage tanks, a rifle and pistol range and fill materials from unknown sources). These potential sources of contaminants are described further below.

Asbestos

Prior to 1973 ACM were commonly used for fireproofing and insulating purposes. In 1973 the U.S. Environmental Protection Agency (EPA) banned spray-applied surfacing asbestos; further bans on asbestos products were adopted in 1975, 1977 and 1978. Asbestos is made up of microscopic fibers that can easily become airborne and inhaled and can cause inflammation of the lungs and other areas of the respiratory system and lead to other health problems.

Asbestos surveys were conducted for Buildings 216, Building 220 and Building 222. These surveys determined that all three buildings contain ACM.¹ No asbestos survey was found for maintenance Building 211, which was built in 1958 and has the potential to contain asbestos. Building 214 and Building 245 were built in the late 1990s and are not expected to contain ACM.

¹ Rose Environmental, *Periodic ACM/PACM Condition Assessment – Lawton US Army Reserve Center, Seattle, Washington* (December 2012).

Lead-Based Paint

Prior to 1978, lead was added to paint to speed up drying, increase durability, maintain a fresh appearance and resist moisture that causes corrosion. Both inside and outside a building, deteriorated lead-paint can mix with household dust and soil. Lead is a highly toxic metal that may cause a range of health problems. In 1978, the federal government banned consumer uses of LBP.

There are no documented LBP surveys or abatement records for any of the buildings onsite. However, because most of the buildings were constructed before 1981, LBP is likely present. Building 214 was constructed in the late 1990s and is not expected to contain LBP.²

PCBs

Prior to 1979, PCBs were widely used in electrical equipment, such as transformers, capacitors, switches, fluorescent lights (ballasts) and voltage regulators. PCBs have been found to cause health problems. When fish and wildlife are exposed to them, PCBs can travel up the food chain, eventually accumulating in their tissues and becoming a threat to human health if eaten. In 1976, the EPA initiated regulation of PCBs through the Toxic Substances Control Act (TSCA) and then banned PCB use in 1978. In 1979, the manufacturing of PCBs in the United States was banned.

There are no PCB-containing ballasts or transformers at Harvey Hall (Building 216) and Leisy Hall (Building 220).³ In 1998, renovations conducted at Harvey Hall, Leisy Hall and Building 222 included upgrades to the lighting system. In 2001-2002, all pole-mounted and pad-mounted transformers were removed from Harvey Hall. No PCB information was found for Maintenance Building 211. Building 214 and OMS Building 245 were constructed in the late 1990s and are not expected to have PCB-containing equipment.

Underground and Aboveground Storage Tanks

Historically, there were five underground storage tanks (USTs) on the Fort Lawton site that were used to store petroleum products. From 1990-1993, five USTs were removed, cleaned, and disposed of. In 2013, there was no evidence of soil contamination at these tank site locations.⁴ The status of three reportable USTs has been listed as “removed” in the Washington Department of Ecology UST system; the other two heating fuel USTs were exempt from reporting as soil samples did not detect petroleum products.³ Past studies have indicated that no environmental conditions related to USTs were found and no further action is recommended on this site.

² Fuller, Mossbarger, Scott and May Engineers, Inc., *Environmental Conditions Property Report* (September 2007).

³ US Army Corp of Engineers, Mobile District, *Final Environmental Assessment (EA) Report*, July 2012.

⁴ EXCEL Engineering, Inc., *Environmental Condition of Property (ECP) Update Report*, April 2013.

Three aboveground storage tanks (ASTs) are located at the Leisy Hall complex. One 4,000-gallon diesel AST is situated on the southern exterior of Building 220 and is associated with an emergency generator. One 200-gallon AST used to store hydraulic fuel for a vehicle lift is situated in a storage room of the AMSA building (Building 222). And one 500-gallon AST used for the storage of used oil collected in maintenance operations conducted at Building 222 is located within a portable hazmat storage shed west of Building 222. No issues of leaks associated with the ASTs have been observed or reported.⁵ There is no information on removal or decommissioning of the ASTs.

Rifle/Pistol Range

The Fort Lawton Rifle Target Range and Pistol Target Range were located on property owned by the Fort Lawton Army Reserve Complex and the city of Seattle. Both were static small arms ranges that were active from approximately 1904 through 1944 for rifle and pistol marksmanship training for those stationed at Fort Lawton Military Reservation. The 1,000-Yard Target Range Munitions Response Site (MRS) is the portion of the Fort Lawton Rifle Target Range located on the original Fort Lawton property but is not included on the current redevelopment site. The target range is located north and extending northwest of AMSA Building 222, partially located on the existing parking lot of the VA building. Historically, arsenic and lead contamination can be present in soils and groundwater around shooting ranges. Past studies indicate that no environmental conditions related to munitions were found and no further action is recommended on this site.⁶

Other Potential Contaminant Sources

Soil and groundwater studies were conducted in the area of the existing paved parking of the VA building (directly adjacent to and northwest of AMSA Building 222) to determine if the property was adversely impacted by historical use or from adjacent properties. The past study indicated that no environmental conditions were found and no further action is recommended on this site.⁷

Talaris Site

The Talaris site contains nine separate buildings historically related to the Institute for Advanced Study. The site is currently in use as the Talaris Conference Center. The buildings were constructed in two phases: Phase I, 1965 – 1967; and Phase II 1970 - 1971. It is unknown if any ACM, LBP or PCB surveys have been conducted on the buildings. However, there is a potential for ACM, LBP and PCB ballasts or other equipment to be present due to the age of the buildings.

An abandoned landfill (Montlake Landfill) is located to the west of the Talaris site. The landfill operated from 1926 to 1966 and was closed in 1971 following landfill practices of

⁵ Fuller, Mossbarger, Scott and May Engineers, Inc., *Environmental Conditions Property Report*, September 2007.

⁶ U.S. Army Corp of Engineers, Omaha District, *Final Site Investigation Report*, May 2010.

⁷ ATC Associates, Inc., Phase II ESA, July 2009.

the time, including covering of the landfill with about 2 feet of clean soil. No landfill deposits underlie the site. The easternmost extent of the mapped abandoned landfill waste is slightly more than 1,000 feet from the western site boundary and a portion of the site is located within the buffer of the landfill. Past studies indicate that there is a low probability of methane migrating from the abandoned landfill onto the site.⁸

3.5.2 Impacts of the Alternatives

An analysis of the potential adverse environmental health impacts of Alternative 1, the Applicant's Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

Alternative 1 - Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant's Preferred Alternative)

Fort Lawton Site

Construction

Under Alternative 1, all the buildings except Building 245 would be demolished and removed from the Fort Lawton site. Demolition of the buildings could generate air pollutants due to dust from demolition activities and emissions from construction vehicles. However, such air pollutants would be temporary in nature and localized to the immediate vicinity of the demolition activity. Demolition activities would be conducted according to applicable air quality regulations established by the Puget Sound Clean Air Agency (PSCAA), and no significant impacts are expected (see Section 3.3 **Air Quality**, and **Appendix D** for details).

Due to the age of some of the existing buildings, there may be ACM, LBP and PCB-containing equipment present and the demolition of these structures could disturb these materials. Exposure to ACM, LBP and PCB could present health and safety issues for workers and the environment. Construction activities would include contingencies for appropriate site-specific health and safety procedures that meet the requirements of WAC 296-843, Hazardous Waste Operations, to minimize the potential for workers to be exposed to hazardous materials during construction, and no significant impacts are expected. Details on environmental-health related impacts from ACM, LBP and PCBs are provided below.

Asbestos

Buildings 216, 220 and 222 are known to contain ACM. Building 211 has the potential to contain asbestos due to its age. The other buildings on the site are not expected to contain

⁸ Shannon & Wilson, Inc., Geotechnical Report, October 2013.

ACM. During demolition and removal of Buildings 216, 220, 222 and 211 under Alternative 1, ACM could be released and potentially impact the health and safety of workers and the environment. ACM are required to be removed and disposed of in accordance with Washington State Regulations prior to any demolition, renovation or remodeling that would disturb these materials. Washington State Department of Labor and Industries and the Puget Sound Clean Air Agency (PSCAA) require that the abatement be performed using Certified Asbestos Workers under the direct on-site supervision of a Certified Asbestos Supervisor. ACM surveys conducted would be consulted for Buildings 206, 220 and 222 prior to any demolition activities to determine where ACM exists. If there are any data gaps in determining where ACM exists, a new ACM survey would be conducted for clarification. A new ACM survey would be conducted for Building 211 prior to any demolition activities to determine if ACM exists. ACM abatement would occur prior to demolition.

Lead-Based Paint

Because most of the buildings on the site were constructed before 1981, the presence of LBP is likely. Building 214, was constructed in the late 1990s and is not expected to contain LBP. LBP surveys would be conducted prior to demolition of buildings on the site under Alternative 1. If LBP is found on the exterior of the buildings, then the LBP survey would be extended to include the soil surrounding buildings that contain exterior LBP. Materials containing LBP would be removed or stabilized prior to demolition.

PCBs

PCBs are not expected to be present Building 216, Building 220, Building 222 or Building 214. Therefore, demolition of these buildings is not expected to release PCBs. No PCB information was found for Maintenance Building 211 and it is possible that demolition of this building could release PCBs. A PCB survey would be conducted for Building 211 to determine if any PCB-containing equipment remains in the building. PCB-containing equipment would be removed prior to demolition. Building 245 would be retained under Alternative 1 and no PCBs would be released during construction.

Underground and Aboveground Storage Tanks

Historically there were five USTs on the Fort Lawton site that were used for storage of petroleum products. These USTs were removed, cleaned, and disposed of. Due to the age of past uses on the site and lack of environmental regulations in the past, it is possible that undocumented underground storage tanks or contaminants could exist at the site and be discovered during construction activities for Alternative 1. Should any contamination be discovered during construction, applicable investigation and cleanup provisions, including applicable Model Toxic Control Act (MTCA) Regulations, would be followed.

There are three ASTs located at Leisy Hall. These ASTs would be properly emptied and removed prior to construction under Alternative 1, in accordance with applicable regulations.

Stormwater Management

During construction under Alternative 1, there would be a potential for accidental spills of construction-related chemicals. Due to the location of the site near Shilshole Bay, stormwater runoff could enter surface waters of the state. The Washington State Department of Ecology (Ecology) requires construction site operators to be covered by a Construction Stormwater General Permit if they are engaged in clearing, grading and excavating activities that disturb one or more acres and discharge stormwater to surface waters of the state. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared as required by the Stormwater Construction General Permit. The SWPPP would be prepared prior to construction at the site and contain Best Management Practice (BMPs) to control stormwater contamination and procedures for preventing and responding to accidental spills.

Operation

Future residential uses could pose a threat to the environment through the misuse and improper disposal of household cleaners, yard fertilizers and pesticides, and gas and other petroleum products used in the operation and maintenance of automobiles and yard equipment.

Talaris Site

Under Alternative 1 the Talaris site would not be redeveloped at this time. The site would remain in its existing condition and no environmental health impacts are expected.

Alternative 2 – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Potential environmental health impacts during demolition and construction of Alternative 2 would be like those described under Alternative 1 except that Building 245 would also be demolished. Building 245 was constructed in 1999 and is not expected to contain any ACM, LBP or PCBs. No significant impacts are expected.

Talaris Site

Under Alternative 2, the Talaris property would be purchased by affordable housing developers and a Phase I Environmental Site Assessment (Phase I) would likely be conducted prior to property transfer. The purpose of the Phase I is to determine the environmental condition of the property.

Construction

The planned construction and renovation of buildings under Alternative 2 at the Talaris site could generate air pollutants such as dust from construction activities or emissions from construction vehicles. However, such air pollutants would be temporary in nature and localized to the immediate vicinity of the construction activity. Construction/renovation

activities would be conducted according to applicable air quality regulations established by the PSCAA, and no significant impacts are expected (see Section 3.3, **Air Quality**, and **Appendix D** for details).

Similar to under Alternative 1, during construction under Alternative 2 there would be a potential for accidental spills of construction-related chemicals. Due to the location of the site near Union Bay, stormwater runoff could enter surface waters of the state. Ecology requires Construction site operators to be covered by a Construction Stormwater General Permit if they are engaged in clearing, grading, and excavating activities that disturb one or more acres and discharge stormwater to surface waters of the state. A SWPPP would be prepared prior to construction at the site and contain BMPs to control stormwater contamination and procedures for preventing and responding to accidental spills. Therefore, no significant impacts are expected.

Asbestos, Lead-Based Paint and PCBs

There is a potential for ACM, LBP and PCB-containing equipment to be present in the existing buildings at the Talaris site. Exposure to ACM, LBP and PCBs during renovation and remodeling activities under Alternative 2 could present environmental health and safety issues for workers and the environment. ACM, LBP and PCB surveys would be conducted prior to renovation and remodeling activities. If LBP is found on the exterior of the buildings, then the LBP survey would be extended to include the soil surrounding buildings that contain exterior LBP. ACM, LBP and PCB-containing materials would be removed and disposed of in accordance with Washington State Regulations prior to any renovation or remodeling that would disturb these materials, and no significant impacts are expected.

Former Landfill

It is unlikely that methane is migrating from the abandoned landfill onto the Talaris site. Therefore, proposed construction would not release this gas and no special measures would be needed to address methane migration with proposed development under Alternative 2.

Operation

Future residential uses under Alternative 2 could pose a threat to the environment through the misuse and improper disposal of household cleaners, yard fertilizers and pesticides, and gas and other petroleum products used in the operation and maintenance of automobiles and yard equipment.

Alternative 3 - Public Park Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Potential environmental health-related impacts of Alternative 3 at the Fort Lawton site would be similar to those described under Alternative 1.

Talaris Site

Potential environmental health-related impacts of Alternative 3 at the Talaris site would be the same as those described under Alternative 2 because the same development is proposed.

Alternative 4 – No Action Alternative

Under the Alternative 4, the Fort Lawton Site would not be redeveloped at this time. The buildings onsite would remain in their existing vacant condition. The City would terminate its lease of the property and the Army would resume maintenance of the site and facilities. Buildings and infrastructure would likely continue to deteriorate. No environmental health impacts are anticipated under Alternative 4.

The Talaris site would not be purchased or redeveloped under Alternative 4. The buildings onsite would remain in their existing condition and would continue to be used a conference center. No environmental health impacts are anticipated.

3.5.3 Mitigation Measures

The following measures have been identified to address the potential environmental health impacts from construction and operation of the Fort Lawton Project under Alternatives 1, 2 and 3. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

Legally-Required Measures

- A site-specific health and safety plan would be prepared that includes the safety requirements of WAC 296-843, Hazardous Waste Operations, and WAC 296-155, Safety Standards for Construction Work to minimize the potential for workers to be exposed to hazardous materials during construction.
- Building construction/renovation would be conducted after a hazardous building materials survey has been completed to identify or confirm the presence of ACM, LBP or PCBs. Hazardous building materials would be removed or stabilized prior to demolition/renovation in accordance with applicable regulations.
- If unanticipated contamination or underground storage tanks are discovered during construction activities, the project would comply with applicable cleanup provisions based on MTCA regulations.

- Spill prevention and response planning would be conducted prior to the start of construction/renovation activities to prevent and, if needed, respond to hydraulic oil or fuel spills. A SWPPP would be developed per Ecology requirements and BMPs followed to reduce the risk of spills and discharges to the stormwater. Stormwater treatment and monitoring would be conducted during demolition and construction activities.

Measures Proposed as Part of Project

- Conventional dust control measures would be implemented to minimize the exposure of workers and the immediate surrounding populations to construction-generated dust (see Section 3.3, **Air Quality**, and **Appendix D** for details).

Other Possible Measures

- Information could be provided to inform residents about the threat to the environment from the misuse and improper disposal of household cleaners, yard fertilizers, and pesticides, and gas and other petroleum products used in the operation and maintenance of automobiles and yards.

3.5.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse environmental-health related impacts are expected.

3.6 LAND USE

This section of the DEIS describes land uses on and near the Fort Lawton and Talaris sites. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified.

Key Findings

Existing land uses on the Fort Lawton site reflect the site's past military use. Land uses in the broader Fort Lawton vicinity include parks (Discovery Park), single-family residences and multi-family residences. Existing land uses on the Talaris site reflect the site's current conference center use. Land uses in the broader Talaris vicinity include single-family residences, multi-family residences, commercial/retail uses and institutional uses (Children's Hospital).

On the Fort Lawton site, proposed development would redevelop the existing, vacant military uses to new multi-family residential and passive and active park uses under Alternative 1, single-family residential uses under Alternative 2, and passive and active parks uses under Alternative 3. Most or all the existing buildings onsite would be removed for proposed development. Development under Alternatives 1 and 2 would increase the density and height/bulk/scale of buildings onsite compared to existing buildings, with a greater increase under Alternative 1, but on a smaller footprint. Alternatives 1, 2 and 3 would increase activity levels onsite, with the greatest increase under Alternative 3 due to the parks/recreation uses, including three multi-purpose fields. Overall, proposed development on the Fort Lawton site under the EIS alternatives is not expected to result in significant adverse impacts on surrounding land uses. Under Alternatives 1 and 3 this is due to the compatibility of proposed uses with off-site uses, layout of uses, provision of buffers/separation, and the lack of new vehicular/pedestrian connection to certain off-site uses. Under Alternative 2 this is due to the compatibility of proposed development with existing off-site uses.

At the Talaris site, development under Alternatives 2 and 3 would convert the existing conference center uses to new multi-family residential uses. All the existing buildings would be retained and reused. Proposed development would increase the density, height/bulk/scale of buildings and activity levels onsite. Overall, proposed development on the Talaris site is not expected to result in significant adverse impacts on surrounding land uses due to the compatibility of proposed uses with existing off-site uses, layout of uses, and provision of buffers/separation of the development from off-site uses.

Alternative 1 would require that a portion of the Fort Lawton site be rezoned from the existing SF 7200 zoning to lowrise residential zoning (e.g., LR 3). Alternative 1 and 2 would require that a portion of the Talaris site be rezoned from SF 5000 to lowrise residential zoning; a Comprehensive Plan amendment would also be required.

Proposed development on the Fort Lawton site and Talaris site under Alternatives 1, 2 and 3 would be consistent with applicable plans, policies and regulations.

Methodology

The pattern of land uses on the Fort Lawton site, the Talaris site and in the site vicinities was described based on site visits conducted in September 2017. An analysis was prepared to evaluate how the EIS alternatives would affect these land uses, either directly, indirectly or cumulatively. This section also compares the consistency of the alternatives with relevant federal, Washington State and City of Seattle land use plans, policies and regulations.

3.6.1 Affected Environment

This sub-section describes existing land uses on and near the Fort Lawton and Talaris sites.

Fort Lawton Site

The approximately 34-acre Fort Lawton site is located in the City of Seattle's Magnolia neighborhood in northwest Seattle. The site is bordered by W Lawton Street to the north, 36th Avenue W to the east, W Government Way to the south and Discovery Park to the west (see **Figure 2-1**, Regional Map, and **Figure 2-2**, Vicinity Map).

Historic Land Use Patterns

In 1897, the Seattle Chamber of Commerce and local citizens donated 703 acres of Magnolia Bluff to the U.S. Army for use as a base to defend Seattle and Puget Sound. Fort Lawton was in active military use as a staging center and prisoner of war camp through World Wars I and II, the Korean War and into the Vietnam War. At the height of base activities during World War II, the Fort included 450 buildings and housed 20,000 soldiers. In 1968, the Army decided to transfer much of the base site to the City of Seattle, which subsequently became Discovery Park, the City's largest park (534 acres). After the land was transferred to the City, a 20-acre portion of the site was turned over to Native Americans to create the Daybreak Star Cultural Center. An area of approximately 46 acres was retained by the U.S. Army and used as a Reserve Center. In 2000, the Army built the Fort Lawton Army Reserve Complex (FLARC) building at the Reserve Center, which was transferred to the Veterans Administration (VA) in 2011. The Federal Government plans to retain the portion of the Army Reserve Center site that contains FLARC, together with supporting parking and the military cemetery. The remaining approximately 34 acres of the Army Reserve Center is the Fort Lawton site in this EIS (see Section 3.9, **Historic and Cultural Resources**, and **Appendix H** for details).

Current Land Use Patterns

On-site Land Uses

Existing development on the Fort Lawton site reflects the past military use of the site. The site contains six buildings, an incinerator stack, roadways, parking areas and sidewalks (see **Figure 2-4**, Fort Lawton Site Plan and **Figure 3.9-1**, Fort Lawton Building Development). Most of the on-site buildings were built for storage, maintenance or vehicle repair purposes. Harvey Hall – Building 216 and Leisy Hall – Building 220 contained administrative and training facilities. None of the structures are currently in use. The on-site buildings range in size from approximately 1,900 sq. ft. to 48,400 sq. ft. There is a total of approximately 95,562 sq. ft. of building area on the site. Existing buildings are typically one to two stories high.

Table 3.6-1
EXISTING FORT LAWTON BUILDING CHARACTERISTICS

Building	Building Number	Building Size (sq. ft.)	Building Height
Harvey Hall	216	25,664	1 -2 stories
Leisy Hall	220	48,338	2 stories
Area Maintenance Support Activity (AMSA)	222	5,837	1 story
Maintenance Building	211	5,426	1 story
Maintenance Building	214	1,930	1 story
Organizational Maintenance Shop	245	8,367	1 story
Total		95,562	

Source: U.S. Army, 2012.

See **Figures 3.9-1** in Section 3.9, **Historic and Cultural Resources**, for the locations of the existing buildings.

There are two large forested areas onsite: one along the north bluff and the other adjacent to the Fort Lawton Cemetery in the south portion of the site. Patches of forest are also present in the west part of the site. Mature trees border the east site boundary along 36th Avenue W and landscaping surrounds the existing buildings.

As shown in **Table 2-1**, approximately 45 percent of the Fort Lawton site is currently developed in building footprints, driveways, parking lots, sidewalks and other built areas. The remaining 55 percent of the site is in open space areas consisting of lawns, landscaping and unmaintained natural areas.

Land Uses in the Site Vicinity

Land uses in the immediate vicinity of the Fort Lawton site are described below.

- **North** – Single-family residential uses in the Magnolia neighborhood are located to the immediate north (north of W Lawton Street), including the Lawtonwood vicinity at the northern tip of Magnolia, which has two vehicle access routes via Texas Way or 40th Avenue W. The Salmon Bay Waterway (part of the Ship Canal) is located nearby to the north and east, including the Hiram Chittenden Locks. The BNSF Railway including a drawbridge spanning the Waterway is also nearby to the north.
- **East** – Single-family residential uses in the Magnolia neighborhood are located to the east (east of 36th Avenue W). Approximately 550 to 600 feet to the east is the Kiwanis Memorial Reserve Park. This is a 15-acre ravine/natural area containing a pedestrian bridge that crosses the park. Beyond the park are additional single-family residences, together with some multi-family uses. Seattle’s Ballard/Interbay Northend Manufacturing & Industrial Center (BINMIC) is located farther east of the site, along both sides of the Waterway. The BINMIC is a light-industrial area containing manufacturing, warehousing, marine uses, transportation, utilities, construction and services to businesses.
- **South and West** – Discovery Park, a 534-acre natural area park, is located to the south and west. The park is situated on Magnolia Bluff and offers views of the Cascade and Olympic Mountain ranges, tidal beaches, open meadows, trails, a play area and the Daybreak Star Cultural Center. Within the park is the 59.3-acre Fort Lawton Historic District. The District consists of a portion of the original Fort with historic buildings and open spaces including the original parade ground and former officers’ quarters housing that was recently renovated and sold on the private market. To the west of Discovery Park is the West Point Lighthouse and the West Point Treatment Plant.

(See **Figure 3.6-1**, Fort Lawton Existing Land Uses.)

Existing Land Use Designations

Comprehensive Plan Designation

According to the *City of Seattle 2035 Comprehensive Plan*, the Fort Lawton site is designated Multi-Family Residential Area. Multi-Family Residential Areas are intended to allow a variety of housing types and densities suitable for a broad array of households and income levels, and to promote walking and transit use near employment concentrations, residential services and amenities. The Comprehensive Plan also indicates that these areas should provide housing for people of all income levels, in developments compatible with the desired neighborhood character.

The Comprehensive Plan land use designations of the areas immediately adjacent to the site include:

- **North** – Single-Family Residential;

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— Project Site
Note: This figure is not to scale



Source: City of Seattle, 2017.



Figure 3.6-1
Fort Lawton Existing Land Uses

- **East** – primarily Single-Family Residential uses, with a City-Owned Open Space Area (Kiwanis Memorial Reserve Park). A Multi-Family Residential Area is designated surrounding W Government Way and a small Commercial / Mixed Use Area is designated around the intersection of W Government Way and W James Street;
- **South** – City-Owned Open Space (Discovery Park), with Single-Family Residential Areas to the southwest; and
- **West** – City-Owned Open Space (Discovery Park). Smaller isolated areas within the park are designated for Single-Family Residential uses.

(See **Figure 3.6-2**, Fort Lawton Comprehensive Plan Map.)

Zoning

According to the *Seattle Land Use Code*, the Fort Lawton site is zoned Single-Family 7200 (SF 7200). The SF 7200 zoning classification provides for single-family housing with one dwelling unit allowed per lot, and a minimum lot size of 7200 sq. ft. While single-family residential uses are the primary uses allowed in this zone, other uses are allowed outright by the Seattle Municipal Code and include nursing homes and adult family homes.

The City zoning classifications of the areas surrounding the Fort Lawton site include:

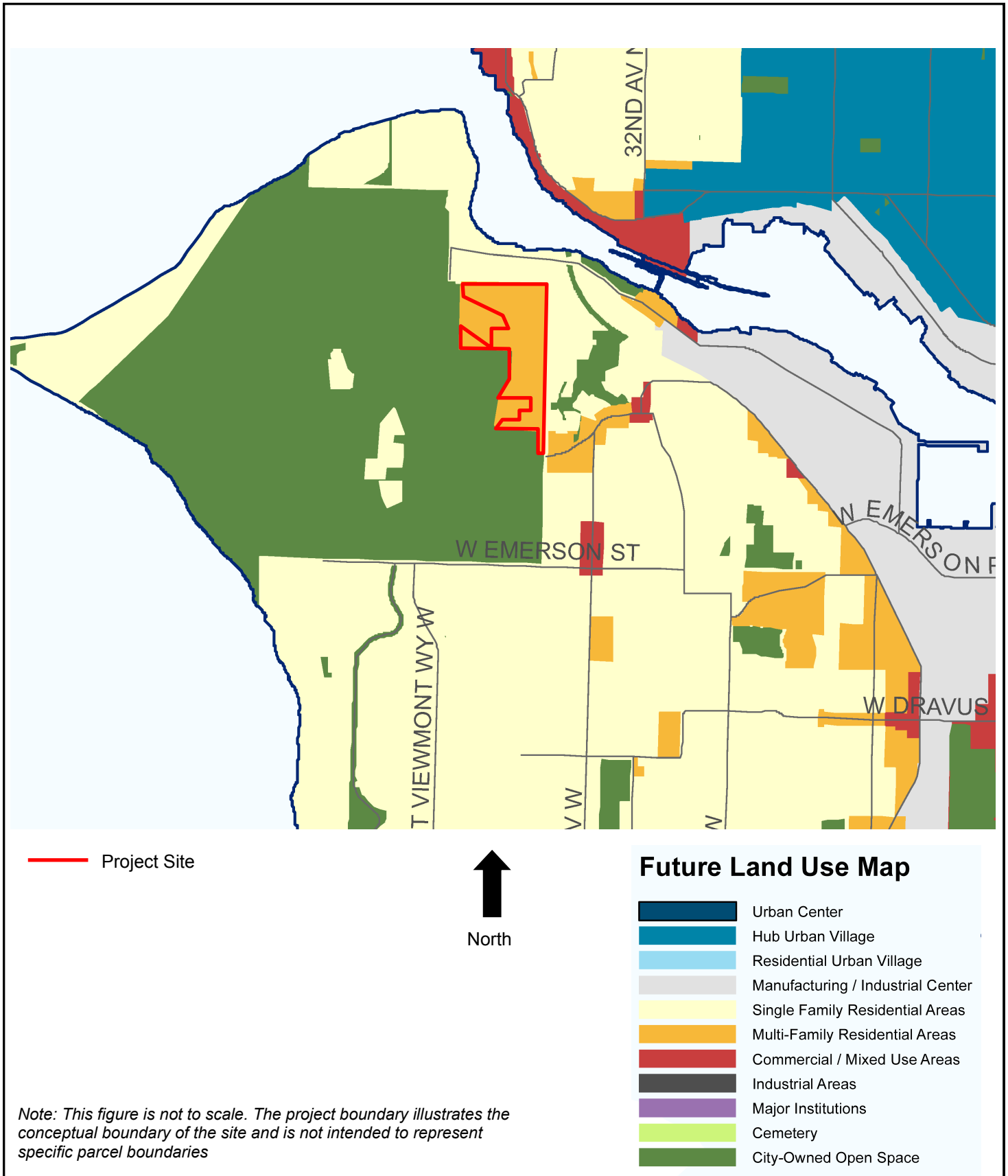
- **North** – SF 7200 (north of W Lawton Street) and SF 5000 (north of W Commodore Way);
- **East** – SF 5000 (east of 36th Avenue W);
- **Southeast** – SF 5000. Surrounding W Government Way, zoning is Lowrise 3 (LR3), Neighborhood Commercial 1 (NC1) and Neighborhood Commercial 2 (NC2);
- **South** – SF 7200 (Discovery Park) and SF 5,000; and
- **West** – SF 7200 (Discovery Park).

(See **Figure 3.6-3** for the zoning classifications of the areas immediately adjacent to the site.)

Talaris Site

The approximately 18-acre Talaris site is located in the Laurelhurst neighborhood in northeast Seattle. The site is bordered by NE 45th Street to the north, 42nd Avenue NE to the east, NE 41st Street to the south and the unimproved 38th Avenue NE right of way to the west (see **Figure 2-1**, Regional Map and **Figure 2-3**, Talaris Vicinity Map).

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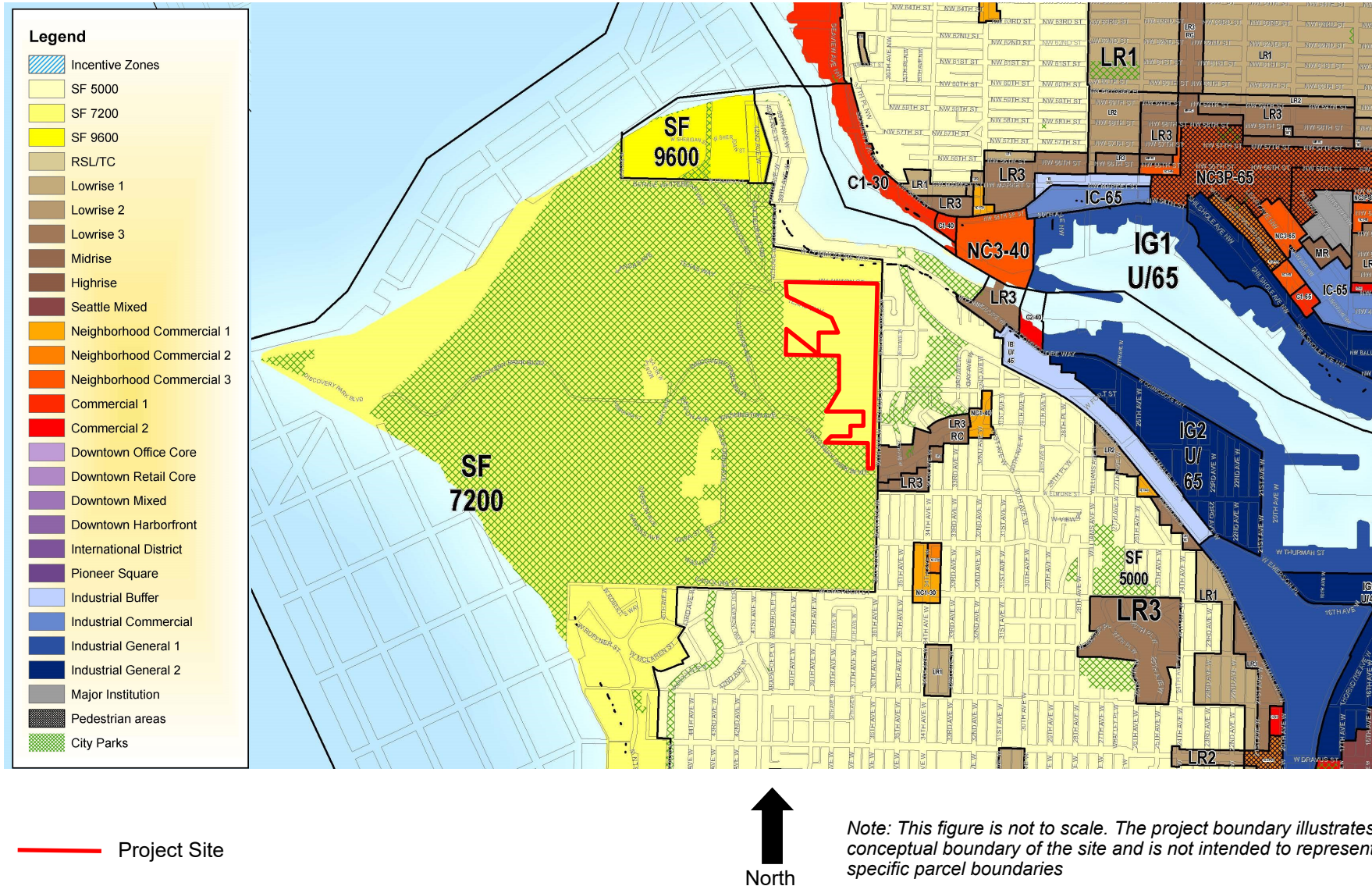


Source: City of Seattle, 2017 .

Figure 3.6-2

Fort Lawton Comprehensive Plan Future Land Use Map

Fort Lawton Army Reserve Center Redevelopment Project Draft Environmental Impact Statement



Source: City of Seattle, 2017.

Figure 3.6-3
Fort Lawton Existing Zoning Map

Historic Land Use Patterns

In the 1960s and 1970s, the Talaris site was developed as the Battelle Memorial Institute. The Battelle campus was used for educational seminars, conferences and workshops and as an advanced study center. In 1997, Battelle sold the property to ERA Communities of Laurelhurst, and in 2000, ERA Communities sold the property to 4000 Property, LLC.

The property was leased to the Talaris Research Institute, which used the facilities to study early childhood development. In 2012, Talaris Research was sold to a Maryland-based company. The property is currently used as a conference center, known as the Talaris Conference Center. In 2013, the buildings and landscaping at the Talaris site were designated as an historic landmark by City of Seattle (see Section 3.9, **Historic and Cultural Resources**, and **Appendix H** for details).

Existing Land Use Patterns

On-site Land Uses

The Talaris site currently contains nine buildings, roadways, parking area and paved trails associated with the Talaris Conference Center. Buildings on the Talaris site are typically one to two stories high and are generally similar in size to existing multi-family buildings to the north of the site and larger than existing single-family residences to the east, south and west of the site.

The existing on-site buildings include:

- Seminar Building D
- Apartment Building A
- Apartment Building B
- Apartment Building C
- Lodge Building E
- Dining Building F
- Office Building G
- Two minor structures

(See **Figure 3.9-1**, Talaris Existing Buildings.)

The remainder of the site is developed as a park-like setting with ornamental landscaping and a manmade pond. Native vegetation and a wetland are present in the southwest part of the site.

In total, approximately 30 percent of the Talaris is comprised of built areas (e.g., building footprints, roadways, parking areas and paved trails) and approximately 70 percent is comprised of open space areas (landscaped and natural areas).

Land Uses in the Vicinity

Land uses in the immediate vicinity of the Talaris site are described below.

- **North** – Multi-family and single-family residential uses are located directly to the north of the site (along NE 45th Street). Commercial retail and office uses are

located to the immediate northwest of the site. Further to the north, beyond NE 45th Street, is the Children's Hospital campus, medical office buildings and multi-family residences.

- **East** – Single-family residential uses are located in the area immediately to the east of the site. Further to the east is Laurelhurst Playfield, which includes two baseball/softball fields, tennis courts, a children's play area, open grass areas and the adjacent Laurelhurst Community Center. Beyond the park are additional single-family residences.
- **South** – To the south of the Talaris site, beyond NE 41st Street, are single-family residences. To the southwest, is the University of Washington's Urban Horticulture Center and the Union Bay Natural Area.
- **West** – Single-family residences are located to the west of the Talaris site. Further to the west is University of Washington's Laurel Village (a student apartment complex), the Ceramic Metal Arts Building and intramural sports fields.

(See **Figure 3.6-4**, Talaris Existing Land Use Map.)

Existing Land Use Designations

Comprehensive Plan Designation

The Talaris site is designated as a Single-Family Residential Area in the *City of Seattle 2035 Comprehensive Plan*. Single-Family Residential Areas are intended to provide opportunities for detached single-family and other compatible housing options that have low height, bulk and scale in order to serve a broad array of households and incomes and to maintain an intensity of development that is appropriate for areas with limited access to services, infrastructure constraints, fragile environmental conditions or that are otherwise not conducive to more intensive development.

The City land use designations in the areas immediately adjacent to the Talaris site include:

- **North** – Commercial/Mixed Uses, Multi-family Residential, Single-Family Residential and Major Institution (Children's Hospital);
- **East** – primarily Single-Family Residential;
- **South** – Single-Family Residential, City-Owned Open Space and Major Institution (University of Washington) and
- **West** – Single-Family Residential and Major Institution (University of Washington).

(See **Figure 3.6-5**, Talaris Comprehensive Plan Future Land Use Map.)

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Note: This figure is not to scale



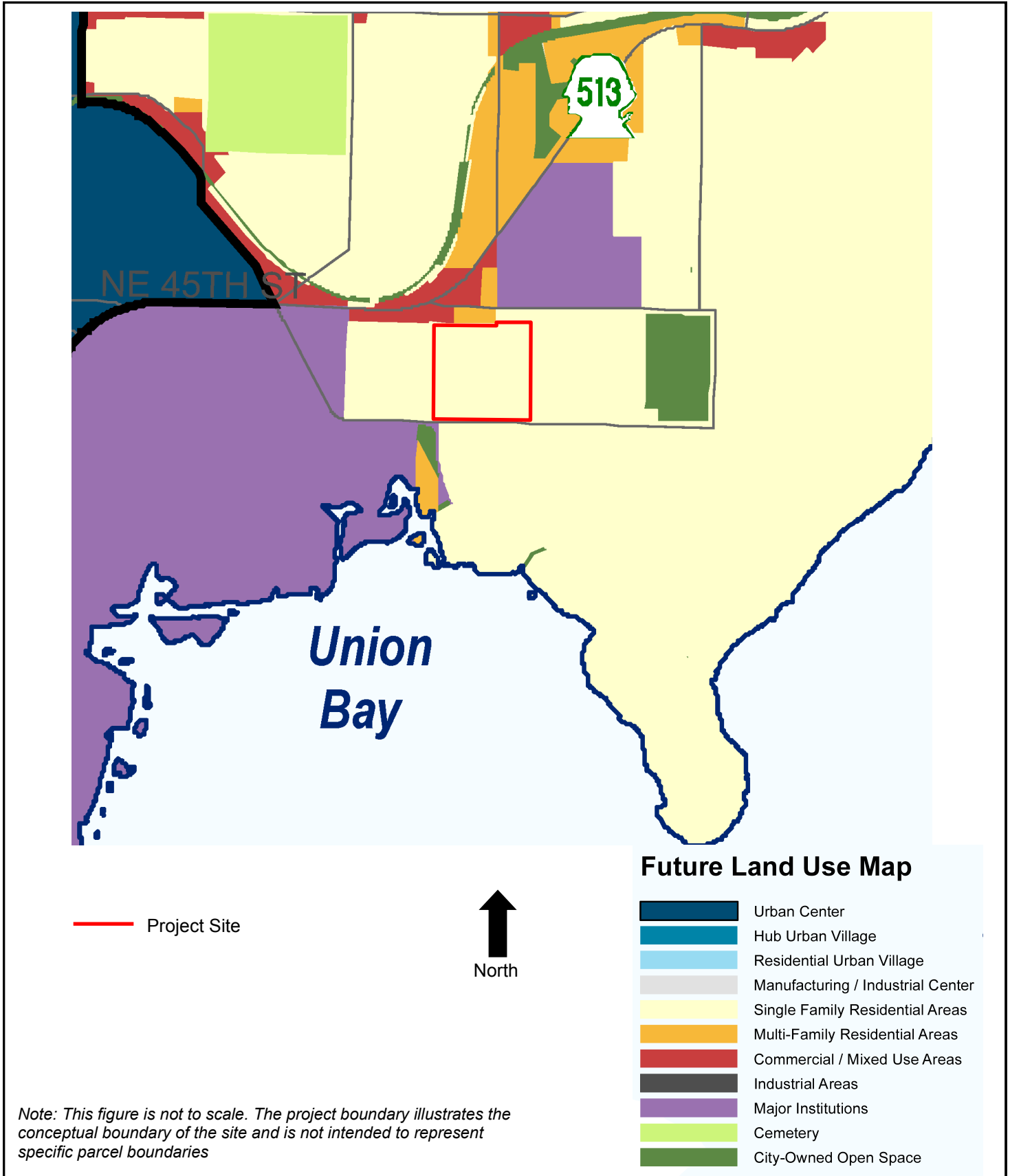
Source: Google Earth and EA Engineering, 2017.



Figure 3.6-4

Talaris Existing Land Uses

**Fort Lawton Army Reserve Center Redevelopment Project
Draft Environmental Impact Statement**



Source: City of Seattle, 2017.

Figure 3.6-5
Talaris Comprehensive Plan Future Land Use Map

Zoning

According to the Seattle Land Use Code, the Talaris site is zoned Single-Family 5000 (SF 5000). This zoning classification provides for single-family housing at one dwelling unit per lot, with a minimum lot size of 5,000 sq. ft. Single-family residential uses are the primary uses allowed in this zone, other uses are allowed outright by the Seattle Municipal Code including nursing homes and adult family homes.

The City zoning classifications of the areas surrounding the Talaris site include:

- **North** – NC2, LR3 and SF 5000; further to the northeast are Major Institution Overlay areas (Children’s Hospital);
- **East** – SF 5000;
- **South** – primarily SF 5000; areas to the southwest are LR1 and Major Institution Overlay (University of Washington); and
- **West** – SF 5000; Major Institution Overlay (University of Washington) further to the west.

(See **Figure 3.6-6**, Talaris Zoning Map.)

3.6.2 Impacts

An analysis of the potential adverse land use impacts of Alternative 1, the Applicant’s Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

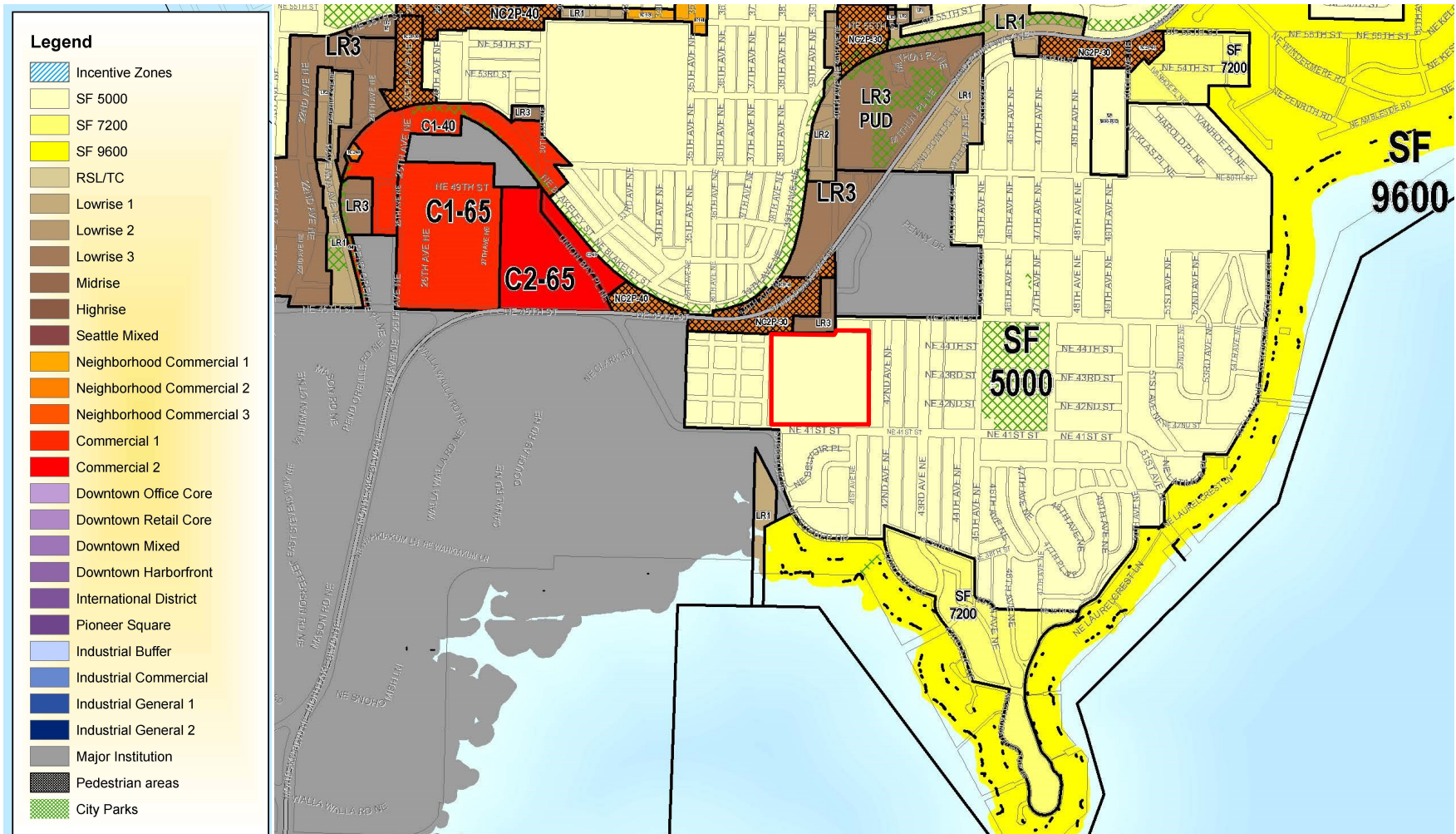
Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant’s Preferred Alternative)

Proposed Actions

As presented in **Chapter 2**, the Proposed Actions evaluated in this DEIS for the Fort Lawton Army Reserve Center Project include:

- City Council approval of an updated redevelopment plan;
- City Council approval of a legislative rezone of portions of the Fort Lawton site from SF 7200 to a lowrise zoning classification, and approval of any necessary amendments to Subchapter II of Chapter 23.34 to accommodate such a rezone;
- City Council authorization of public property conveyances from the U.S. Army to the City of Seattle, including acquisition and subsequent sale of parcels designated for housing development and execution of necessary easement agreements;
- Preliminary and final plat approvals;
- City Council approval of funding for acquisition and development; and
- Land use, building and construction permit approvals.

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— Project Site



Note: This figure is not to scale. The project boundary illustrates the conceptual boundary of the site and is not intended to represent specific parcel boundaries

Source: City of Seattle, 2017.

Under Alternative 1, proposed development would feature a mix of affordable housing on the Fort Lawton site, including affordable rental and ownership and formerly homeless housing. Approximately 238 housing units would be provided on the site. A portion of the site would be rezoned to lowrise residential zoning. Community facilities, such as case management services, residential counselors, on-site meeting space, on-site offices and a potential computer lab area, would be included for the housing. Public park uses would be provided onsite, including active park facilities, preserved existing natural areas and the conversion of an existing structure to a park maintenance facility. Up to 4.7 acres of forest land owned by the U.S. Army in the west portion of the site could be dedicated to Discovery Park. New development would be phased over an approximately seven-year buildout period (see **Figures 2-6A** and **2-6B**, Fort Lawton Site Plan – Alternative 1).

No new development is assumed for the Talaris site.

Fort Lawton Site

Construction Impacts

Demolition of most of the buildings, site preparation and construction of infrastructure and buildings under Alternative 1 could result in periodic, temporary impacts to adjacent land uses. Construction-related impacts would include additional dust and emissions from construction equipment and vehicles; increased noise from construction activities; vibration associated with construction activities and vehicle movement; and increased traffic associated with construction vehicles and construction workers. Construction activities would occur incrementally through buildout of the site in 2025. These activities would move around the site and could result in temporary impacts to adjacent land uses when construction occurs near the boundary of the site or near adjacent uses (see Section 3.1, **Earth**; Section 3.3, **Air Quality**; Section 3.4, **Noise**, and Section 3.10, **Transportation** for details).

Existing land uses that would have the greatest potential to be impacted by construction under Alternative 1 would include the existing single-family residences to the immediate east of the site (beyond 36th Avenue West) and existing single-family residences to the immediate north of the site (beyond West Lawton Street). Residences in the nearby Lawtonwood area could experience periodic temporary delays in vehicular access due to construction activities. Visitors to Discovery Park could also experience construction impacts, particularly those that use trails near the Fort Lawton site. Overall, construction-related impacts to off-site land uses would be temporary in nature and with implementation of legally-required measures (e.g., adherence to construction regulations related to air quality, noise and traffic), significant adverse impacts are not anticipated. No on-site uses would be impacted during construction because the site is currently vacant.

Direct Impacts

Relationship to Comprehensive Plan and Zoning

Redevelopment under Alternative 1 would require that a portion of the Fort Lawton site be rezoned from the existing SF 7200 zoning to lowrise residential zoning. The proposed housing is most consistent with current Lowrise 3 development standards. However, it should be noted that the City of Seattle is currently considering legislation to amend development standards for all lowrise zones which, if adopted, could make proposed development under Alternative 1 consistent with Lowrise 1 or Lowrise 2 standards. Lowrise residential zoning would be consistent with the Multi-Family Residential Comprehensive Plan designation for the Fort Lawton site which is intended to allow a variety of housing types and densities suitable for a broad array of households and income levels.

A rezone could be accomplished through a legislative rezone process. The applicant would prepare a rezone proposal, City staff would review the proposal and City Council approval would be required. In addition, the City Council would need to enact any necessary amendments to Subchapter II of Chapter 23.34 to accommodate such a rezone. See subsection 3.6.4, Relationship to Plans and Policies, for details.

On-site Uses

Development under Alternative 1 would convert the vacant former military storage, maintenance and vehicle repair uses on the Fort Lawton site into new multi-family affordable housing, community facilities and public park uses. All the existing vacant buildings on the site would be demolished, except for the OMS – Building 245, which would be retained as a maintenance facility for the Seattle Parks and Recreation Department (SPR).

The proposed land uses would result in potential land use impacts that would be typical of an urban development, including increases in densities and associated activity levels (e.g., pedestrian/vehicular noise and movement). Residential densities would increase on the site with the development of approximately 238 housing units – 86 senior supportive apartments, 100 affordable rental units, 40 affordable ownership townhomes and 12 affordable ownership rowhouses.

The activity levels on the site would substantially increase from existing conditions due to the new residential development, increased resident population and increased employee population associated with the community facilities. Activity levels would also increase due to the provision of open space and recreation areas under Alternative 1. Approximately 13.0 acres of passive recreation areas would be provided, including a large passive park in the north portion of the site and a smaller passive park in the central area. Approximately 5.1 acres of area would be developed as active park facilities, including two unlit, multi-

purpose fields in the central portion of the site. These facilities would provide space for athletics and community activities, including SPR programmed uses.

Relationship to Surrounding Uses

The relationship of development under Alternative 1 to surrounding uses would primarily be a function of the intensity of the proposed uses (such as the types of uses, density of the development, height/bulk/scale of buildings and levels of activity associated with the development), the intensity of surrounding uses, the proximity of proposed uses to surrounding uses, and the separation/buffers between proposed uses and surrounding uses, as described below.

Types of Uses – The proposed multi-family residential, park and community facility uses on the Fort Lawton site would be compatible with the existing single-family residential uses to the north and east, multi-family residential uses to the southeast and the parks use to the south and west.

Density, Height/Bulk/Scale and Proximity of Development - The development of residential uses under Alternative 1 would increase the residential density and bulk and scale of buildings on the Fort Lawton site in proximity to existing single-family residences to the north and east of the site and park uses to the south and west of the site. Under Alternative 1, the density on the Fort Lawton site would increase from zero dwelling units/acre to approximately 11.4 dwelling units per acre.¹ For comparison, most of the existing single-family residential parcels to the east of the Fort Lawton site (approximately 60 percent) are 4,000-square foot lots; the remaining parcels (approximately 40 percent) range from 6,000 to 8,400-square feet. The 4,000-square foot lots equate to a density of approximately 10.9 dwelling units per acre, while the remaining parcels equate to a density ranging from 5.2 to 7.3 dwelling units per acre. Therefore, the density under Alternative 1 would be greater than the low end, but similar to the high end of the density of development to the east of the site. The density would also be similar to that of the multi-family housing to the southeast.

Proposed buildings are assumed to be three stories in height, which would generally be similar in height to the two- and three-story buildings that are adjacent to the site. Development on the site would include apartments and rowhouses with greater bulk and scale than the adjacent single-family residential uses to the north and east of the site, and townhouses with bulk and scale similar to the adjacent single-family residential uses (see **Figure 2-9, Massing Diagrams**). The townhouses on the east edge of the Fort Lawton site would be located approximately 100 feet from existing off-site single-family residences. The bulk and scale of the proposed apartments would be like some of the former military

¹ The density calculation is based on the area of the site that would be redeveloped under Alternative 1 which equates to approximately 20.9 acres (total site area, minus the proposed passive open space and retained natural, forested areas). The density of the site based on the total site area, including open space areas, would be approximately 7.0 dwelling units per acre.

buildings onsite and the existing FLARC VA building to the west of the site. The bulk and scale of the proposed rowhouses would be like the existing multi-family development located approximately 0.15 miles to the southeast.

Several features of proposed development are designed to reduce impacts on surrounding uses. The layout of the development would minimize impacts to off-site uses by locating the lowest density housing (the townhouses) along the eastern edge of the site where they would be proximate to adjacent existing off-site single-family residences. Higher density development (rowhouses and apartments) would be located in the central and west portions of the site and would be separated from existing off-site single-family residences. New development would also be separated from existing single-family residences to the north and east by existing retained vegetated/forested areas and the existing topography (see the discussion of buffers/separation below). As a result, significant land use impacts, in terms of density and height/bulk/scale, are not expected.

Activity Levels - As mentioned previously, activity levels would increase due to increased density and associated on-site population under Alternative 1. This increased activity would occur in the general vicinity of single-family residential uses to the east and park uses to the west of the Fort Lawton site. Residences to the north of the site would be separated from proposed development by existing topography and retained vegetated/forested areas on the site (see the discussion of buffers/separation below). Development of the proposed housing would result in new residents and visitors traveling to and from the site. Increased activity associated with vehicle traffic would be noticeable for off-site uses, including residences in the Lawtonwood neighborhood who travel through the Fort Lawton site. However, it would be less noticeable to neighbors to the east, as there would be no access points provided along this portion of the site. Activity levels on the site would be higher than the existing surrounding residential and park areas; however, this increase in activity levels is not anticipated to result in a significant land use impacts due to the provision of buffers/separation between proposed uses and existing off-site uses, and the relatively minor increase in activity from these uses.

The proposed open space and recreation uses would also increase activity levels on the site, particularly the active recreation facilities, including two multi-use fields. While these uses would increase activity levels, the active recreation area would be located in the central portion of the site, separated from adjacent residential uses to the east by the proposed lower density housing, and from Discovery Park by forest land that could be dedicated to the park. Overall, no significant land use impacts from open space and recreation activities are anticipated due to the provision of buffers/separation between proposed uses and existing off-site uses.

Separation/Buffers – Under Alternative 1, the existing natural areas in the north, south and west portions of the site would be retained and the vegetated buffer along the east site boundary would be maintained and, as necessary, enhanced to provide a buffer between proposed development on the Fort Lawton site and existing residential uses to the north

and east, and park uses to the south and west. Topographic separation between proposed development and the residences to the north and east would be preserved with the proposed grading. Existing roadways, including 36th Avenue W, W Lawton Street and Government Way W, would also provide separation between on- and off-site uses.

Overall, proposed residential and park uses on the Fort Lawton site are not expected to result in significant adverse impacts on surrounding land uses, due to the compatibility with off-site uses, layout of uses, provision of buffers/separation, and the lack of vehicular/pedestrian connection to certain off-site uses.

Talaris Site

Under Alternative 1, no new development would occur on the Talaris site and the existing uses on the site would remain. No new land use impacts are anticipated.

Indirect/Cumulative Impacts

Redevelopment on the Fort Lawton site under Alternative 1 would contribute to the cumulative residential and employment growth in the Magnolia area. The increase in on-site population (residents, employees and visitors) would contribute to a cumulative increase in activity levels in the area. The increase in population could also result in an increased demand for goods and services. It is anticipated that most of this demand could be fulfilled by businesses near the site in the Magnolia area.

To the extent that area property owners perceive an opportunity for development based, in part, on the new population at the Fort Lawton site, some new development in the area could be indirectly generated. However, there is little developable land in the area, and any development/redevelopment indirectly generated by development of the Fort Lawton site would likely occur incrementally over time. New development in the vicinity would be controlled by existing Comprehensive Plan policies and zoning regulations. As a result, significant indirect/cumulative impacts to land uses in the area are not anticipated.

Alternative 2 – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

Under Alternative 2, the Fort Lawton site would be sold to a private developer for the development of market-rate single-family residences. The development of affordable and formerly homeless housing would occur on the Talaris site. Approximately 113 market-rate houses would be developed on the Fort Lawton site and approximately 238 affordable housing units and associated community facilities would be developed on the Talaris site. No active or passive public park areas would be required on the Fort Lawton or Talaris site. Up to 4.7 acres of forested land in the west portion of the site could be: retained by the U.S. Army and used as open space for the FLARC VA offices; purchased by the developer of the private homes and used as private open space for the development; or purchased by the City for future public use (see **Figure 2-10**, Fort Lawton Site Plan - Alternative 2, and **Figure 2-11**, Talaris Site Plan – Alternatives 2 and 3).

Fort Lawton Site

Construction Impacts

Construction impacts would be similar to Alternative 1 and would include temporary impacts from demolition of all the buildings, site preparation and construction of infrastructure and buildings. Construction-related impacts would include additional dust and emissions from construction equipment and vehicles; increased noise from construction activities; vibration associated with construction activities and vehicle movement; and increased traffic associated with construction vehicles and construction workers. Overall, construction-related impacts to off-site land uses would be temporary in nature and with implementation of mitigation measures (e.g., adherence to construction regulations), significant adverse impacts are not anticipated.

Direct Impacts

Relationship to Comprehensive Plan and Zoning

The development of single-family detached market-rate housing under Alternative 2 would be allowed by the current Multi-Family Residential Area and SF 7200 zoning of the Fort Lawton site. A zoning reclassification would not be required.

On-site Uses

Development under Alternative 2 would convert the former military storage, maintenance and vehicle repair structures on the Fort Lawton site into new market-rate single-family housing. All the existing vacant buildings on the site would be demolished. New market-rate housing would be developed in phases over the approximately 7-year buildout period, similar to Alternative 1.

The proposed land uses under Alternative 2 could result in potential land use impacts that would be typical of an urban development, including increases in densities and associated activity levels (e.g., pedestrian/vehicular noise and movement). These impacts would be less than under Alternative 1 because fewer housing units would be developed on the site and less activity would be associated with on-site population. In addition, no active or passive public park areas would be provided on the Fort Lawton site, which would further reduce the activity levels on the site compared with Alternative 1.

Relationship to Surrounding Uses

Type of Uses - The proposed single-family housing would be compatible with the single-family residential uses to the north and east, park uses to the south and west, and multi-family uses to the southeast.

Density, Height/Bulk/Scale and Proximity of Development – Like Alternative 1, the development of single-family residences under Alternative 2 would increase density on the

site, but the density would be lower under this alternative than Alternative 1. Under Alternative 2, the density on the Fort Lawton site would increase from zero dwelling units/acre to approximately 4.0 dwelling units per acre.² For comparison purposes, the density of existing single-family residences to the east of the site ranges from approximately 5.2 dwelling units per acre to 10.9 dwelling units per acre, with the majority of existing residences in that area (approximately 60 percent) being 10.9 dwelling units per acre. Based on the existing zoning, new single-family residences would be a maximum of 30 feet in height and would likely include building footprints that would maximize the amount of building coverage that is allowed by code on 7,200-square foot lots. Density, and building height/bulk/scale is expected to generally be similar to existing residences in the surrounding area.

Activity Levels - Activity levels on the site would increase under Alternative 2 compared with the existing, vacant conditions of the Fort Lawton site. However, activity levels would be lower than Alternative 1 because there would be fewer residential units and no active or passive public park and recreation areas would be provided.

Buffers/Separation - The existing forest areas in the north and south portions of the site and vegetated buffer along the eastern edge of the site are more likely to be removed with development under Alternative 2 and proposed single-family residences would be located in closer proximity to existing off-site land uses, including residences to the east and north of the Fort Lawton site. Landscaping that could also provide buffers to surrounding uses would be at the discretion of the private developer and homeowners. Grading may or may not remove the topographic separation between proposed development and the residences to the north and east. Existing roadways, including 36th Avenue W, W Lawton Street and Government Way W, would continue to provide separation between on- and off-site uses.

Overall, proposed single-family market-rate housing on the Fort Lawton site under Alternative 2 is not expected to result in significant adverse impacts on surrounding land uses due to the compatibility with off-site uses, lower density and height/bulk/scale of development, and lower activity levels.

Talaris Site

Construction Impacts

Construction impacts on the Talaris site under Alternative 2 would include temporary impacts from site preparation and construction and renovation of buildings and infrastructure (238 affordable multi-family housing units and associated community facilities). It is assumed that all the existing buildings on the Talaris site would be retained and reused for the affordable and formerly homeless housing and community facilities and

² The density calculation is based on the area of the site that would be redeveloped under Alternative 2 which equates to approximately 28 acres (total site area, minus the proposed buffer space). The density of the site based on the overall total site area would be approximately 3.3 dwelling units per acre.

that new housing would also be constructed on the site. Construction-related impacts would include additional air quality emissions due to dust and emissions from construction equipment and vehicles; increased noise levels from construction activities; vibration associated with construction activities and vehicle movement; and increased traffic associated with construction vehicles and construction workers through buildout (see Section 3.1, **Earth**; Section 3.3, **Air Quality**; Section 3.4, **Noise**, and Section 3.10, **Transportation** for details).

Existing uses that would have the greatest potential to be impacted by construction under Alternative 2 would include the single-family residences to the immediate north, south and west of the Talaris site, as well as existing multi-family residences located to the immediate north of the site, because those areas would be most proximate to potential new development under Alternative 2. Overall, construction-related impacts to off-site land uses would be temporary in nature and with implementation of legally-required measures (e.g., adherence to construction regulations), significant adverse impacts are not anticipated.

Direct Impacts

Relationship to Comprehensive Plan and Zoning

Similar to Alternative 1, the development of multi-family housing units on the Talaris site under Alternative 2 would require a rezone to lowrise residential zoning (e.g., Lowrise 3). A rezone could be accomplished through a legislative rezone process. A rezone proposal would need to be prepared, City staff would review the proposal and City Council approval would be required. Due to the site's Single-Family Residential Comprehensive Plan designation, a Comprehensive Plan amendment would also be required to allow for a rezone to lowrise residential zoning. The City Council would need to enact any necessary amendments to Subchapter II of Chapter 23.34 to accommodate a rezone. See subsection 3.6.4, Relationship to Plans and Policies, for details.

On-site Uses

Development under Alternative 2 would convert existing conference facility uses into multi-family affordable housing and associated community facilities. It is assumed that all the existing buildings on the Talaris site would be retained and reused for the affordable and formerly homeless housing and community facilities and that new housing would also be constructed on the site. Approximately 238 affordable housing units would be provided on the Talaris site. Potential new housing development would be located in the northwest corner of the site and along the south portion of the site. Community facilities would be within existing buildings and would be available for use by residents as well as by the public.

The proposed land uses could result in potential land use impacts that would be typical of an urban development, including increases in densities and associated activity levels (e.g., pedestrian/vehicular noise and movement). Residential densities would increase on the site

with development of affordable housing and would result in increased on-site population and associated activity levels compared to existing activity levels on the site. However, the increase in activity levels onsite would be lower than Alternative 1 because the Talaris site currently includes a level of activity associated with the existing conference center uses on the site.

Relationship to Surrounding Uses

Types of Uses – The proposed multi-family residential and community facility uses on the Talaris site would be compatible with the existing single-family uses surrounding the site, commercial/office and multi-family residential uses to the north and institutional (hospital) uses to the northeast of the site.

Density, Height/Bulk/Scale and Proximity of Development - The development of multi-family housing on the Talaris site would increase density and bulk and scale of development in proximity to the existing single-family residences surrounding the site and multi-family residential complexes to the north of the site. Density on the Talaris site would increase from zero dwelling units/acre to approximately 13.2 dwelling units/acre.³ This density would be greater than in the surrounding Laurelhurst single-family neighborhood, but similar to the multi-family housing to the north. New buildings are assumed to be three-stories in height, generally similar to the two- and three-story single-family residential buildings that are adjacent to the site and similar to or lower than the three- to four-story multi-family residential buildings to the north. Development on the site would include apartments and rowhouses with greater bulk and scale than the adjacent single-family residences but similar in bulk and scale to the nearby multi-family buildings (see **Figure 2-9**, Massing Diagrams). The bulk and scale of the proposed apartments and rowhouses would be like some of the conference center buildings onsite. The bulk and scale of the proposed townhomes would be similar or greater than adjacent existing single-family development.

The layout of the development is designed to minimize impacts to off-site uses. Lower density housing (townhouses) would be placed proximate to the adjacent single-family residences and higher density housing (rowhouses and apartments) would be located in the central and northwest portions of the site, generally at a distance from surrounding single-family housing. Development along the west edge of the Talaris site would be located approximately 50 feet from existing off-site single-family residences to the west. Development along the north and south portions of the site would be located approximately 75 feet from existing off-site single-family and multi-family residences.

Activity Levels - Activity levels would increase as a result of increased density and associated on-site population under Alternative 2, similar to under Alternative 1. This activity would occur in the general vicinity of the single-family residences surrounding the site. Development of single-family housing would result in new residents and visitors

³ Density calculation is based on the entire 18-acre site area.

traveling to and from the site; the community facilities would also result in some additional traffic. Activity levels associated with the community facilities onsite would be similar to the existing conference center uses. These on-site activity levels would be higher than the existing surrounding single-family residences due to the amount and density of development. However, activity levels would be similar to the multi-family and commercial/office uses in the area, and less than Children's Hospital to the northeast.

Buffers/Separation – Under Alternative 2, the existing natural area in the southwest corner of the site would be retained and would serve as a buffer between proposed on-site development and the existing single-family housing to the southwest. Consistent with the historic landmark status of the Talaris site, it is assumed that much of the existing landscaping would be preserved with development of the site and would serve as a buffer between on and off-site uses, particularly along the east, south and west boundaries of the site. The existing topographic separation that exists along the northwest boundary of the site would be maintained and would separate proposed development in that area from adjacent single-family homes. Existing roadways, including NE 45th Street to the north, 42nd Avenue NE to the east, NE 41st Street to the south and the unimproved 38th Avenue NE right of way to the west, would provide separation between on and off-site uses. In particular, NE 41st Street includes a vegetated landscape buffer (including mature trees) between the two travel lanes for the majority of the Talaris site frontage which would provide a further buffer from the single-family homes to the south.

Overall, proposed multi-family affordable housing on the Talaris site under Alternative 2 is not expected to result in significant adverse impacts on surrounding land uses due to the compatibility with off-site uses, layout of uses, and provision of buffers/separation from off-site uses.

Indirect/Cumulative Impacts

Redevelopment on the Fort Lawton site and Talaris site under Alternative 2 would contribute to the cumulative residential and employment growth in the City of Seattle, and the Magnolia and Laurelhurst areas. An increase in on-site populations (residents, employees and visitors) would also contribute to a cumulative increase in activity levels surrounding each of the sites. The increase in population could result in an increased demand for goods and services. It is anticipated that most of this demand could be fulfilled by businesses near the sites in the Magnolia and Laurelhurst areas.

To the extent that area property owners perceive an opportunity for development based, in part, on the new population associated with the Fort Lawton site and Talaris site, some new development in the area could be indirectly generated. In particular, development at the Talaris site would represent a small portion of total development in that area of the city and could result in a marginal increase in demand for commercial services, particularly due to the proximity to commercial/retail uses along NE 45th Street and Sand Point Way. However, few sites are available for development/redevelopment and any development in the area generated indirectly by development of the Fort Lawton site and Talaris site would likely

occur incrementally over time. New development in the vicinity would be controlled by existing Comprehensive Plan policies and zoning regulations. As a result, significant indirect/cumulative impacts to land uses in the area are not anticipated.

Alternative 3 – Public Park Uses Onsite; Affordable/Homeless Housing Offsite

Under Alternative 3, the entire Fort Lawton site would be developed as a public park, including approximately 17.0 acres of passive recreation area and approximately 7.6 acres of active recreation areas. Active recreation areas would include three, unlit multi-purpose fields, which would be owned and maintained by SPR. Up to 4.7 acres of forest land owned by the U.S. Army in the west portion of the site could be dedicated to Discovery Park. Park facilities would be developed when funding is available (see **Figure 2-11**, Talaris Site Plan – Alternatives 2 and 3 and **Figures 2-12 A and B**, Fort Lawton Site Plan – Alternative 3).

New affordable and formerly homeless housing would be developed on the Talaris site, including approximately 238 affordable housing units and associated community facilities.

Fort Lawton Site

Construction Impacts

Development of new park uses on the Fort Lawton site would result in temporary impacts from demolition of most of the buildings, site preparation and construction of infrastructure and park facilities. Construction-related impacts would include dust and emissions from construction equipment and vehicles; increased noise levels from construction activities; vibration associated with construction activities and vehicle movement; and increased traffic associated with construction vehicles and construction workers (see Section 3.1, **Earth**; Section 3.3, **Air Quality**; Section 3.4, **Noise**, and Section 3.10, **Transportation** for details). Overall, construction-related impacts to off-site land uses would be temporary in nature and are anticipated to be less than under Alternative 1 because no housing would be developed onsite.

Direct Impacts

Relationship to Comprehensive Plan and Zoning

Park uses on the Fort Lawton site would be allowed by the site's Multi-Family Residential Area Comprehensive Plan designation and SF 7,200 zoning. A zoning reclassification would not be required.

On-site Uses

Development under Alternative 3 would convert the former military storage, maintenance and vehicle repair structures on the Fort Lawton site into new park and open space uses,

including approximately 17.0 acres of passive recreation area and approximately 7.6 acres of active recreation areas (three, unlit multi-use fields). New park facilities, particularly the multi-use fields, would result in increased activity levels on the site compared to existing conditions. The assumed park and open spaces would result in visitors traveling to and from the site and increased activity, primarily from the use of the multi-use fields. While activity levels would increase compared to existing conditions, it is anticipated that these levels would be less than Alternative 1 since no residential development would be provided onsite.

Relationship to Surrounding Uses

Type of Uses – The proposed park uses on the Fort Lawton site under Alternative 3 would be compatible with the park uses to the south and west (Discovery Park), and the residential uses to the north, east and southeast of the site.

Density, Height/Bulk/Scale and Proximity of Development - The new park and recreation facilities on the Fort Lawton site under Alternative 3 would not increase building density or height/bulk/scale on the site.

Activity Levels - New open space and recreation uses would increase the activity levels on the site, particularly the active recreation facilities, including the three multi-use fields, which would be used for athletic events and SPR programmed uses. This increased activity would be in proximity to existing residential uses to the north and east. Similar to under Alternative 1, increased activity associated with vehicle traffic would be noticeable for off-site uses, including residences in the Lawtonwood neighborhood who travel through the Fort Lawton site. However, it would be less noticeable to neighbors to the east, as there would be no access points provided along this portion of the site.

Buffers/Separation – Like Alternative 1, the existing natural areas in the north, south and west portions of the site would be retained and the vegetated buffer along the east site boundary would be maintained and, as necessary, enhanced to provide a buffer between proposed development on the Fort Lawton site and existing residential uses to the north and east. Topographic separation between proposed development and the residences to the north and east would be preserved with the proposed grading. Existing roadways, including 36th Avenue W, W Lawton Street and Government Way W, would also provide separation between on and off-site uses.

Overall, proposed park uses on the Fort Lawton site under Alternative 3 are not expected to result in significant adverse impacts on surrounding land uses due to the compatibility with off-site uses, provision of buffers/separation, and the lack of vehicular/pedestrian connection to certain off-site uses.

Talaris Site

Development of affordable and formerly homeless housing on the Talaris site would be the same as described under Alternative 2 and potential land use impacts would also be the same.

Indirect/Cumulative Impacts

Redevelopment on the Fort Lawton site and Talaris site under Alternative 3 would contribute to the cumulative residential, employment and recreational growth in the City of Seattle, and the Magnolia and Laurelhurst areas. An increase in on-site populations (residents, employees and visitors) would also contribute to a cumulative increase in activity levels surrounding each of the sites. The increase in population could also result in an increased demand for goods and services. It is anticipated that most of this demand could be fulfilled by businesses near the sites in the Laurelhurst area.

To the extent that area property owners perceive an opportunity for development based, in part, on the new population associated with the Fort Lawton and Talaris sites, some new development in the area could be indirectly generated. In particular, development at the Talaris site would represent a small portion of total development in that area of the city and could result in a marginal increase in demand for commercial services, especially due to the proximity to commercial/retail uses along NE 45th Street and Sand Point Way. However, few sites are available for development/redevelopment and any development in the area generated indirectly by development of the Fort Lawton site and Talaris site would likely occur incrementally over time. New development in the vicinity would be controlled by existing Comprehensive Plan policies and zoning regulations. As a result, significant indirect/cumulative impacts to land uses in the area are not anticipated.

Alternative 4 – No Action Alternative

The Fort Lawton site would remain in its existing vacant condition under Alternative 4 and the property would not be conveyed by the U.S. Army to the City of Seattle. The City would terminate its lease of the property and the U.S. Army would resume maintenance of the site and facilities. Buildings and infrastructure would likely continue to deteriorate. Consistent with the BRAC process, the Fort Lawton site could be conveyed to the City or another entity in the future and could be developed in accordance with the existing SR 7,200 zoning. Under the existing zoning, up to 205 single-family residential units could be developed onsite; other permitted uses with the SR 7200 zoning include public schools, nursing homes and adult care facilities. The Talaris site would also remain in its existing condition and no new development would occur on the site at this time. Since both sites would be assumed to remain in their existing conditions, no new land use impacts are anticipated under Alternative 4.

3.6.3 Mitigation Measures

The following measures have been identified to address the potential land use impacts from construction and operation of the Fort Lawton Project under Alternatives 1, 2 and 3. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

Legally-Required Measures

- Proposed development would adhere to all applicable City of Seattle Land Use Code requirements.
- Under Alternatives 1, 2 and 3, new landscaping would be provided on the Fort Lawton site. Under Alternative 2 and 3, existing landscaping would be preserved on the Talaris site consistent with the historic designation for the site.
- Additional mitigation measures would be provided to minimize overall impacts from construction of the site (see Section 3.1, **Earth**; Section 3.3, **Air Quality**; Section 3.4, **Noise**, and Section 3.10, **Transportation**).
- Additional mitigation measures would be provided to minimize the overall impacts from operation of the development (see Section 3.4, **Noise**, Section 3.7, **Aesthetics**, Section 3.10, **Transportation**, and Section 3.11, **Public Services**).

Measures Proposed as Part of the Project

- Proposed development would be phased over an approximately seven-year buildout period.
- Under Alternative 1 and 3, proposed development would include open space areas on the Fort Lawton site. Forested areas in the north, south and west parts of the site would be retained and the existing vegetation along the eastern edge of the site would be preserved. As necessary, the vegetative buffer on the east edge of the site would be enhanced to provide a further buffer between the site and adjacent uses.
- Under Alternative 2 and 3, proposed development would include open space areas on the Talaris site. The natural area in the southwest part of the Talaris site would be retained and would provide a buffer between the site and adjacent uses.

3.6.4 Significant Unavoidable Adverse Impacts

Development under Alternatives 1 and 2 would convert the Fort Lawton site from its existing, vacant military storage and maintenance buildings to new residential uses. Development under Alternatives 1 and 3 would include active and passive parks uses on the Fort Lawton site. Development under Alternatives 2 and 3 would convert the existing conference center uses on the Talaris site to new residential uses. These conversions of uses would result in an intensification of uses and an increase in activity levels on the sites. No significant unavoidable adverse land use impacts are anticipated.

3.6.5 Relationship to Plans and Policies

This section evaluates the consistency of the EIS alternatives with relevant adopted land use plans, policies and development regulations in effect at the time of publication of this DEIS. As described in **Chapter 2**, at this point, no federal actions or federal funding have been identified for the Fort Lawton Project, and environmental review is being conducted under SEPA. However, it is possible that federal funding could be available in the future and NEPA environmental review could be required. In anticipation of such federal funding, discussions of the relationship of the EIS alternatives to certain federal plans, policies and regulations are provided. The plans, policies and regulations that are summarized and evaluated in this section include:

State and Regional Plans, Policies and Regulations

- *Washington Coastal Zone Management Program*
- *State Growth Management Act*
- *Puget Sound Regional Council Vision 2040*
- *King County Countywide Planning Policies*

Local Plans, Policies and Regulations

- *City of Seattle Comprehensive Plan*
- *City of Seattle Consolidated Plan for Housing and Community Development 2014-2017*
- *City of Seattle Land Use Code*
- *Discovery Park Master Plan*

Federal Plans, Policies and Regulations

- *HUD Environmental Regulations*
- *Clean Air Act*
- *Clean Water Act*
- *Endangered Species Act*
- *Migratory Bird Treaty Act*
- *Executive Order 13112, Invasive Species*
- *National Historic Preservation Act*
- *Coastal Zone Management Act*

State of Washington Plans, Policies, and Regulations

The Washington Coastal Zone Management Program

Summary: *In 1972, Congress passed the Federal Coastal Zone Management Act to encourage the appropriate development and protection of the nation's coastal and shoreline resources. The Coastal Zone Management Act gives states the primary role in managing these areas. To assume this role, the state must prepare a Coastal Zone Management Program (CZMP) document that describes the State's coastal resources and how these resources are managed. In 1976, Washington was the first state to receive federal approval of a Coastal Zone Management Program. The Department of Ecology's Shorelands and Environmental Assistance Program is responsible for implementing Washington's Program.*

Washington's Program defines the State's coastal zone to include the 15 counties with marine shorelines: Clallam, Grays Harbor, Island, Jefferson, King, Kitsap, Mason, Pacific, Pierce, San Juan, Skagit, Snohomish, Thurston, Wahkiakum and Whatcom counties. Under Washington's Program, certain activities that affect any land use, water use or natural resource of the coastal zone must comply with the enforceable policies within the six laws identified in the Program document: the Washington State Shoreline Management Act (SMA), the State Environmental Policy Act (SEPA), the Clean Water Act, the Clean Air Act, the Energy Facility Site Evaluation Council (EFSEC) and the Ocean Resource Management Act (ORMA).

Discussion: The Fort Lawton site and Talaris site are located in King County, a Washington State coastal zone. However, both sites are located outside the jurisdiction of the SMA. The EIS alternatives would be consistent with applicable provisions of the Clean Water Act and the Clean Air Act as described later in this sub-section, and the EFSEC and ORMA do not apply to the Fort Lawton project. This EIS is prepared in compliance with SEPA.

Growth Management Act

Summary: *The Growth Management Act (GMA) (RCW 36.70A), adopted in 1990 and subsequently amended, provides a comprehensive framework for managing growth and coordinating land use planning with the provision of infrastructure. The general goals of the GMA include, in part: directing growth to urban areas; reducing sprawl; encouraging economic development consistent with adopted comprehensive plans; protecting private property rights; providing efficient multi-modal transportation systems; encouraging a variety of housing types and densities affordable to all economic segments of the population; protecting the environment; and ensuring that public facilities and services necessary to support development meet locally established minimum standards at the time development is in place (RCW 36.70A.020).*

Jurisdictions subject to GMA must prepare and adopt: countywide planning policies; comprehensive plans containing policies with specific elements for land use, transportation,

housing, capital facilities, utilities, rural lands and economic development; and development regulations implementing those plans. The GMA requires that each city and county in Washington comprehensively review and revise its comprehensive plan and development regulations as necessary every seven years to ensure that they comply with the GMA.

Discussion: Consistent with the GMA, the City of Seattle has adopted a Comprehensive Plan and implementing regulations to guide future development and fulfill the City's responsibilities under the GMA (the Comprehensive Plan was most recently updated in 2016). EIS Alternatives 1, 2 and 3, as described in **Chapter 2** of this DEIS, would satisfy several of the GMA goals, including: directing growth to urban areas (both the Fort Lawton and Talaris sites are located in Seattle, an urban area); encouraging a variety of housing types and densities affordable to all economic segments of the population (Alternatives 1, 2 and 3 include a mix of affordable apartments, rowhouses and townhouses; Alternative 2 also includes market-rate single-family housing); protecting the environment (critical areas on the sites have been/will be identified and provisions made for their protection); and ensuring that public facilities and services necessary to support development meet locally established minimum standards at the time development is in place (public services/facilities are available to serve the project). The relationship of the EIS alternatives to the City of Seattle Comprehensive Plan is discussed in greater detail later in this sub-section.

Regional Plans, Policies and Regulations

Puget Sound Regional Council Vision 2040

Summary: *VISION 2040 (updated in 2008) is the long-range growth management, economic and transportation strategy for the central Puget Sound region encompassing King, Kitsap, Pierce and Snohomish counties. VISION 2040 provides a regional framework for achieving the goals of the GMA and meets the multi-county planning requirements of the GMA for these counties. The vision is for diverse, economically and environmentally healthy communities framed by open space and connected by a high-quality, multimodal transportation system that provides effective mobility for people and goods. VISION 2040 calls for locating development in urban growth areas--focused in Metropolitan, Core and Larger Cities and their Urban Centers--so services can be provided efficiently and farmlands, forests and other natural resources are conserved.*

Discussion: Alternatives 1, 2 and 3 are consistent with VISION 2040 because they would redevelop the Fort Lawton or Talaris site as denser, affordable or market-rate housing within a Metropolitan City (Seattle). They would help the City achieve its overall housing target, which was developed in accordance with recommendations from VISION 2040 (see Section 3.13, **Housing and Socioeconomics**, for details).

King County Countywide Planning Policies

Summary: *The King County Countywide Planning Policies (CPP) were developed and adopted by the King County Growth Management Planning Council in 1991 (and were last updated in June 2012, with amendments adopted in 2016) consistent with GMA mandates to provide policies to guide development of jurisdictional comprehensive plans. The CPP include guidance on topics such as urban growth areas, affordable housing, open space, economic development, rural character, public facilities and services and a regional transit plan. In terms of affordable housing, the policies direct jurisdictions to specify the range and amount of housing affordable to low and moderate-income households to be accommodated in its comprehensive plan.*

Discussion: The City of Seattle Comprehensive Plan was developed and updated (most recently in 2016) to comply with the GMA and CPP. The City adopted targets for affordable housing in accordance with the direction from the CPP and to meet the needs associated with growth by 2035. Alternatives 1, 2 and 3 would help the City achieve its targets for affordable housing (see Section 3.13, **Housing and Socioeconomics**, for details). The proposed project's consistency with the Seattle Comprehensive Plan is discussed below.

City of Seattle Comprehensive Plan

Summary: *The City of Seattle Comprehensive Plan provides the overall goals and identifies land use patterns for the city. The relationship of the EIS alternatives to relevant goals and policies of the Comprehensive Plan is provided below.*

The City of Seattle's Comprehensive Plan, Toward a Sustainable Seattle, was first adopted in 1994 to meet the requirements of GMA; the Comprehensive Plan has been amended every year since its adoption, and was substantially updated most recently in November 2016 (Seattle 2035 Comprehensive Plan: Managing Growth to Become an Equitable and Sustainable City 2015-2035). The Comprehensive Plan consists of 14 major elements: growth strategy, land use, transportation, housing, capital facilities, utilities, economic development, environment, parks and open space, arts and culture, community well-being, community engagement, container port, shoreline areas and neighborhood planning. Each element contains goals and policies that are intended to guide development of the City in the context of regional growth management for the next 20 years. While each element affects development within the City, the following elements are the most relevant to the EIS alternatives.

Growth Strategy Element

GS 1.22 – *Support healthy neighborhoods throughout the city so that all residents have access to a range of housing choices, as well as access to parks, open space and services.*

GS 1.23 – Allow limited multi-family, commercial and industrial uses outside of urban villages to support the surrounding areas or to maintain the existing character.

GS 2.4 – Work toward a distribution of growth that eliminates racial and social disparities by growing great neighborhoods throughout the city, with equitable access for all and with community stability that reduces the potential for displacement.

Discussion: Alternatives 1, 2 and 3 would provide a range of housing types/densities (including multi-family apartments, rowhouses, townhouses; and under Alternative 2 single-family detached homes). They would also provide a mix of affordable housing including supportive housing for formerly homeless seniors, as well as affordable rental and ownership housing for low-income families and individuals. A variety of public park uses would also be provided under Alternatives 1 and 3 on the Fort Lawton site, including preservation of natural areas, development of new park spaces that could support a range of uses including active recreation (e.g., multi-purpose fields) and re-use of an existing structure as a park maintenance facility (see **Chapter 2** for details).

As mentioned above, multi-family housing would be included under the Alternatives 1, 2 and 3. Neither the Fort Lawton nor the Talaris site is located in an urban village. However, existing multi-family housing is present near both sites. Also, the Fort Lawton site is designated Multi-Family Residential in the Comprehensive Plan, indicating the future use the City envisions for the site (see Section 3.6.2, for details).

Alternatives 1, 2 and 3 would not result in disproportionate impacts to minority or low-income populations. In fact, the affordable housing provided under these alternatives could be considered a positive impact relative to providing additional affordable housing serving a variety of households and diversifying neighborhoods that are disproportionately occupied by higher income households (i.e., the Magnolia and Laurelhurst neighborhoods) (see Section 3.14, **Environmental Justice**, for details).

The senior supportive housing under Alternatives 1, 2 and 3 would include the provision of a comprehensive package of services focused on residential stability and the well-being of residents, including case management services provided onsite by Catholic Community Services of Western Washington and residential counselors that would be available onsite 24 hours a day (see **Chapter 2** for details).

GS 3.1 – Encourage the preservation, protection and restoration of Seattle’s distinctive natural features and landforms such as bluffs, streams and remaining evergreen forests.

GS 3.25 – Promote well-defined outdoor spaces that can easily accommodate potential users and that are well integrated with adjoining buildings and spaces.

GS 3.26 – Design public spaces that consider the nearby physical context and the needs of the community.

Discussion: Under Alternatives 1 and 3, public park uses would be provided on the Fort Lawton site, including active park facilities, preserved existing natural areas and conversion of an existing structure to a park maintenance facility. Unlit, multi-purpose fields would be provided in the central portion of the site, adjacent to proposed housing and parking. Existing wooded areas in the north and south parts of the site would be preserved in their natural condition. Up to 4.7 acres of forest land owned by the U.S. Army in the west portion of the site could be dedicated to Discovery Park. All the parks would be designed per Seattle Parks and Recreation (SPR) standards, and would be owned and maintained by SPR. The park areas would be available for use by project residents as well as the public.

Under Alternatives 2, no public park uses would be provided on the Fort Lawton site. Under Alternatives 2 and 3, natural areas would be preserved on the Talaris site, including the area in the southwest portion of the site that contains a wetland and eagles nest site.

(See **Chapter 2** for details on the open space and parks uses under the EIS alternatives.)

Land Use Element

LU 1.1 – Use the Future Land Use Map to identify where different types of development may occur in support of the urban village strategy.

LU 1.3 – Provide for a wide range in the scale and density permitted for multi-family residential, commercial, and mixed-use projects to generally achieve the following overall density and scale characteristics, consistent at minimum with the guidelines in Growth Strategy Figure 1.

LU G2 – Provide zoning and accompanying land use regulations that allow a variety of housing types to accommodate housing choices for households of all types and income levels; support a wide diversity of employment-generating activities to provide jobs for a diverse residential population, as well as a variety of services for residents and businesses; and, accommodate a full range of public services, institutions, and amenities needed to support a racially and economically diverse, sustainable urban community.

LU 2.1 – Allow or prohibit uses in each zone based on the zone’s intended function as described in this Land Use Element and on the expected impacts of a use on other properties in the zone and surrounding area. Generally allow a broad mix of compatible uses in the urban centers and urban villages.

LU 2.3 – Allow residential use outright or as a conditional use in all zones except industrial zones and those shoreline areas where residential uses may conflict with the intended function of the shoreline environment.

Discussion: The Fort Lawton site is currently designated Multi-Family Residential in the *Seattle 2035 Comprehensive Plan*. Multi-Family Residential Areas are intended to allow a variety of housing types and densities that are suitable for a broad array of households and

income levels and that promote walking and transit use near employment concentrations, residential services and amenities. The Fort Lawton site is zoned SF 7200. The Talaris site is currently designated Single-family Residential in the Comprehensive Plan. Single-family Residential Areas are intended to provide opportunities for detached single-family and other compatible housing options that have low height, bulk and scale to serve a broad array of households and incomes, and to maintain an intensity of development that is appropriate for areas with limited access to services, infrastructure constraints, fragile environmental conditions or that are otherwise not conducive to more intensive development. The Talaris site is zoned SF 5000.

Proposed development of the project at either site would require approval of a legislative rezone of portions of the site from its existing zoning to a lowrise zoning classification (e.g., Lowrise 3), and approval of any necessary amendments to Subchapter II of Chapter 23.34 to accommodate such a rezone. The required rezone at the Fort Lawton site would be consistent with the site's Multi-Family Residential Land use designation. Due to the Talaris site's Single-family Residential Comprehensive Plan designation, a Comprehensive Plan amendment would be required to allow for a rezone.

Proposed development under Alternatives 1, 2 and 3 would feature a range of housing types/densities (including multi-family apartments, rowhouses, townhouses, and under Alternative 2 single-family detached homes). A mix of affordable housing would be provided on either the Fort Lawton or Talaris site, including affordable rental and ownership and formerly homeless housing; Alternative 2 would provide market-rate housing on the Talaris site. Alternatives 1 and 3 would also provide active and passive public parks uses on the Fort Lawton site (see **Chapter 2** for details). The potential for development under the EIS alternative to cause land use impacts--directly, indirectly or cumulatively--is discussed in Section 3.6.2, Environmental Impacts. The analysis concluded that the conversion of land uses on the two sites would result in an intensification of uses and an increase in activity levels. However, no significant adverse land use impacts are expected. Under Alternatives 1 and 3 at the Fort Lawton site, this would be due to the compatibility of proposed development with off-site uses, layout of uses, provision of buffers/separation, and the lack of vehicular/pedestrian connection to certain off-site uses. Under Alternative 2 at the Fort Lawton site, this would be due to the compatibility of proposed development with existing off-site uses, lower density and height/bulk/scale of development, and lower activity levels. Under Alternatives 2 and 3 at the Talaris site, this would be due to the compatibility of proposed uses with existing off-site uses, layout of uses, and provision of buffers/separation of the development from off-site uses.

LU 5.3 – Control the massing of structures to make them compatible with the area's planned scale, provide a reasonable ratio of open to occupied space on a site and allow the building to receive adequate natural light.

LU 5.4 – Use maximum height limits to maintain the desired scale relationship between new structures, existing development and the street environment; address varied topographic

conditions; and limit public view blockage. In certain Downtown zones and in Industrial zones, heights for certain types of development uniquely suited to those zones may be unlimited.

LU 5.5 – Provide for residents’ recreational needs on development sites by establishing standards for private or shared amenity areas such as rooftop decks, balconies, ground-level open spaces or enclosed spaces.

Discussion: Building massing under the EIS alternatives is described in **Chapter 2** and shown in **Figures 2-9**. The proposed arrangement of buildings in the affordable housing communities under Alternatives 1, 2 and 3 is designed to place the densest building development toward the central portion of the sites, away from site boundaries and nearby residential uses. All the proposed buildings would be within the maximum height limits of the sites’ zoning. With the development patterns represented under the alternatives, and siting and scaling of future multi-family uses, the resulting outcome would be a land use pattern that maintains reasonable land use compatibility in use transitions, adjacencies, proximity, density and intensity of use (see Section 3.6.2, Environmental Impacts, for details).

Under Alternatives 1 and 3, a large portion of the Fort Lawton site (61% under Alternative 1 and 73% under Alternative 3) would be in open space, including: passive open space, active open space and landscaped areas. The active open space would include two multi-purpose fields under Alternative 1 and three multi-purpose fields under Alternative 3. The park areas on the site would be available for use by project residents as well as the public. Up to 4.7 acres of forest land owned by the U.S. Army in the west portion of the site could be dedicated to Discovery Park. Under Alternative 2, the market-rate housing on the Fort Lawton site would likely include private yards and possibly balconies for individual homeowners. Under Alternatives 2 and 3, passive open space would be provided on the Talaris site (see **Chapter 2** for details).

LU 5.9 – Enhance the visual quality of an area through standards for visual screening and landscaping appropriate to each zone in order to limit the visual impact of new development on the surrounding neighborhood, streetscape and development in areas with less intrusive zone.

LU 5.15 – Address view protection through: zoning that considers views, with special emphasis on shoreline views; development standards that help to reduce impacts on views, including height, bulk, scale and view corridor provisions, as well as design review guidelines; and, environmental policies that protect specified public views, including views of mountains, major bodies of water, designated landmarks and the Downtown skyline.

Discussion:

Landscaping - Under Alternatives 1 and 3, the landscaping that would be provided on the Fort Lawton site would blend with the existing natural vegetation in Discovery Park and the landscaping in the Magnolia neighborhood, and would meet applicable City of Seattle landscape regulations. The landscape concept would feature preservation of wooded areas (e.g., in the north and south portions of the site) and would maintain and, as necessary, enhance the existing vegetation along the east edge of the site that serves as a buffer between the site and the Magnolia neighborhood. Under Alternative 2, landscaping on the Fort Lawton site would be at the discretion of the homebuilder(s) and homeowners, and may or may not retain the wooded areas in the north and south portions of the site or the existing vegetation on the east edge of the property (see **Chapter 2** for details).

The Talaris site landscaping has been designated as an historic landmark by City of Seattle. Under Alternatives 2 and 3, much of the existing landscaping would be retained with the development of the affordable housing on this site. Any modifications to the existing landscaping would adhere to the requirements of the site's historic landmark designation.

Views - A view analysis was prepared for this DEIS based on photographs taken of the Fort Lawton site from selected viewpoints and photo simulations of proposed development under the EIS alternatives from these viewpoints. The viewpoints for the visual analysis were identified based on several factors, including the City's view protection policies in SMC 25.05.675.P.2.a, 2.b. and 2.c. (e.g., specified viewpoints, parks, scenic routes and historic landmarks where the site and proposed development could be seen) and other public places with possible views of the site. Potential view impacts of development under Alternatives 2 and 3 at the Talaris site were generally discussed based on the Massing Diagrams and the Talaris Site Plan (see **Figures 2-9** and **2-11**). The view analysis determined that no significant impacts on views are expected at either site under Alternatives 1, 2 and 3 (see Section 3.7, **Aesthetics/Visual Resources**, and **Appendix G**, for details).

Height/Bulk/Scale - The development of multi-family, affordable housing under Alternative 1, 2 and 3 would increase the residential density and activity levels on the Fort Lawton and Talaris sites in proximity to existing single-family residences in the surrounding neighborhoods. The height/bulk/scale of the largest proposed buildings (apartments and rowhouses) would be similar to existing buildings on the Fort Lawton and Talaris sites; the smallest buildings (duplex townhouses) would be similar to adjacent single-family housing. A mix of densities would be provided with the proposed development. The project is intended to be a well-designed community that would be compatible with the surrounding areas and is not expected to generate significant adverse land use impacts at either site.

Building development on the Fort Lawton site under Alternatives 1 largely would not be visible, directly interface with or connect to surrounding areas. Specifically, the project would locate the densest building development in the central portions of the site away from site boundaries and nearby single-family residential development. Existing

buffers/separators (e.g., vegetation and topography) would be preserved and, as necessary, enhanced. A minimal number of vehicular and pedestrian access points would be provided, to reduce the project's interface with the surrounding area and limit adverse transportation-related impacts. As a result, significant adverse land use impacts from the increased density/activity levels onsite are not expected (see Section 3.6.2, for details).

Single-Family Residential Areas

LU G7 – Provide opportunities for detached single-family and other compatible housing options that have low height, bulk and scale in order to serve a broad array of households and incomes and to maintain an intensity of development that is appropriate for areas with limited access to services, infrastructure constraints, fragile environment conditions, or that are otherwise not conducive to more intensive development.

LU 7.5 – Encourage accessory dwelling units, family-sized units and other housing types that are attractive and affordable, and that are compatible with the development pattern and building scale in single-family areas in order to make the opportunity in single-family areas more accessible to a broad range of households and incomes, including lower-income households.

LU 7.12 – Emphasize measures that can increased housing choices for low-income individuals and families when considering changes to development standards in single-family areas.

Discussion: Both the Fort Lawton and Talaris sites are located within single-family neighborhoods and are currently in single-family zoning (although the Fort Lawton site is designated as Multi-Family Residential by the City's Comprehensive Plan). Other more intensive uses/zoning are located near the sites. Under Alternative 2, the entire Fort Lawton site would be developed in market-rate single-family detached housing, similar to development in the adjacent Magnolia neighborhood. Under Alternatives 1, 2 and 3, more intensive, multi-family affordable housing is proposed on the Fort Lawton or Talaris site. See above and Section 3.6.2 for a discussion of the potential height/bulk/scale impacts of the proposed affordable housing.

The affordable housing under Alternatives 1, 2 and 3 would include supportive housing for formerly homeless people and affordable rental and ownership housing for low-income families and individuals. This housing would require a legislative rezone of a portion of the Fort Lawton site from SF 7200 to a lowrise zoning classification, and approval of any necessary amendments to Subchapter II of Chapter 23.34 to accommodate such a rezone. A similar legislative rezone and Land Use Code amendments would be necessary for proposed development on the Talaris site, and a Comprehensive Plan amendment would also be required.

Multi-Family Residential Areas

LU G8 – Allow a variety of housing types and densities that is suitable for a broad array of households and income levels, and that promotes walking and transit use near employment concentrations, residential services and amenities.

LU 8.2 – Maintain a variety of multi-family zoning classifications that allow development at different densities, scales and configurations and that are well suited to the variety of specific conditions and development goals in diverse areas of the city.

LU 8.3 – Provide housing for Seattleites at all income levels in development that is compatible with the desired neighborhood character and that contributes to high-quality, livable urban neighborhoods.

LU 8.9 – Establish lowrise multi-family zones to accommodate various housing choices in the low to moderate density range suitable for a broad array of households and incomes, including walk-up apartments, town houses, row houses, duplexes, triplexes, and cottage housing.

Discussion: A variety of housing types and densities would be provided under Alternatives 1, 2 and 3 (e.g., apartments, rowhouses and townhouses, and under Alternative 2 single-family detached homes). Alternatives 1, 2 and 3 would include affordable housing on the Fort Lawton or Talaris site; Alternative 2 would include market-rate housing on the Fort Lawton site. The affordable housing would feature supportive housing for formerly homeless people and affordable rental and ownership housing for low-income families and individuals, (see **Chapter 2** for details).

As indicated above, the proposed affordable housing would require a rezone of portions of the Fort Lawton or Talaris site to a lowrise zoning classification.

Historic Preservation and Cultural Resources

LU 14.4 – Encourage adaptive reuse of designated landmark structures by allowing uses in these structures that may not otherwise be allowed under the applicable zoning provided such action is approved by the Landmarks Preservation Board.

LU 15.2 – Encourage rehabilitation opportunities and reinvesting in vacant or underutilized historic properties to spark economic revitalization.

LU 15.3 – Encourage rehabilitation of existing housing units and other building types that expands affordable housing choices and contributes to market-rate and workforce housing.

Discussion: The Fort Lawton site contains the vacant former U.S. Army Reserve Center. No designated landmarks are currently located on the Fort Lawton site. The Army determined that the site is not eligible for listing in the National Register of Historic Places (NRHP). Most of the buildings onsite are not expected to meet the criteria to be designated a Seattle

Landmark. The Talaris site is currently occupied by the Talaris Conference Center. The site is not currently listed on the NRHP. The buildings and landscape on the Talaris site is a designated Seattle Landmark, and the site has been determined eligible for listing in the NRHP. The buildings and landscaping are also considered to have local and national significance (see Section 3.9, **Historic and Cultural Resources**, and **Appendix H** for details).

Under Alternative 1, the vacant former Army Reserve Center would be converted to affordable housing and public park uses, and all but one of the buildings would be removed (Building 245); under Alternative 2, the site would be converted to market-rate housing and all the buildings would be removed; and under Alternative 3, the site would be converted to public park uses and all but one of the buildings would be removed (Building 245). Under Alternative 2 and 3, the existing historic buildings on the Talaris site would be retained and reused, and new buildings would be constructed onsite to provide affordable housing. Development on the Talaris site would require approval from the Landmark Preservation Board (see Section 3.9, **Historic and Cultural Resources**, and **Appendix H** for details).

Housing

H G1 – Provide fair and equal access to housing for all people in Seattle.

H 1.3 – Work to overcome historical land use patterns of segregation, promote fair housing choices and foster inclusive communities that are free from discrimination through actions, such as affirmative marketing and fair housing education and enforcement.

H G2 – Help meet current and projected regional housing needs of all economic and demographic groups by increasing Seattle’s housing supply.

H 2.2 – Identify publicly owned sites suitable for housing and prioritize use of sites where appropriate, for rent/income-restricted housing for lower-income households.

H2.4 – Encourage the use of vacant or underdeveloped land for housing and mixed-use development, and promote turning vacant housing back into safe places to live.

H G3 – Achieve a mix of housing types that provide opportunity and choice throughout Seattle for people of various ages, races, ethnicities, and cultural backgrounds and for a variety of household sizes, types and incomes.

H 3.3 – Encourage the development of family-size housing affordable to households with a broad range of incomes in areas with access to amenities and services.

H G4 – Achieve healthy, safe and environmentally sustainable housing that is adaptable to changing demographic conditions.

H 4.7 – Promote housing for all Seattleites that is safe and free from environmental and health hazards.

H G5 – Make it possible for households of all income levels to live affordably in Seattle, and reduce over time the unmet housing needs of lower-income households in Seattle.

H 5.3 – Promote affordable housing to lower-income households in locations that help increase access to education, employment and social opportunities, while supporting a more inclusive city and reducing displacement from Seattle neighborhoods or from the city as a whole.

Discussion: Under Alternative 1, the City of Seattle is proposing to redevelop the vacant, former Fort Lawton Army Reserve Center site as an affordable housing community. Alternatively, the proposed mix of affordable rental and ownership housing could be located at the Talaris site (as proposed under Alternatives 2 and 3) or at another off-site location. Alternatives 1, 2 and 3 would provide: approximately 85 units of permanent supportive housing for homeless seniors, including veterans (plus one manager unit); approximately 100 units of affordable rental apartments for low-income households with incomes up to 60% of area median income, including families with children; and approximately 50 townhomes and rowhouses to provide affordable homeownership opportunities for families with incomes up to 80% of the area median income. A variety of housing types would be provided. The project is intended to affirmatively further fair and equal access to quality, affordable housing for low-income people, particularly in areas with few affordable housing options, including neighborhoods with a history of racial restrictive covenants or “redlining” (e.g., the Magnolia and Laurelhurst neighborhoods) (see **Chapter 2**, and Section 3.13, **Housing and Socioeconomics**, for details).

The U.S. Army currently owns the Fort Lawton site. The Talaris site is privately owned. Under Alternatives 1 and 3, the Army would convey the Fort Lawton site to the City in accordance with the Base Realignment and Closure (BRAC) process. The City proposes to use this unique opportunity to leverage public property for community benefit.

Housing developed on the Fort Lawton or Talaris site would adhere to the Evergreen Sustainable Development Standards (ESDS). These standards include maximizing density; providing open space access, walkable neighborhoods, water conserving fixtures, reduced energy use and increased insulation; and using low Volatile Organic Compound (VOC) materials. Development of the Fort Lawton or Talaris sites is not expected to result in environmental health or safety risks to future residents. Existing environmental health hazards (i.e., possible lead based paint, asbestos containing materials and PCBs in aging buildings) would be removed and properly disposed of, or stabilized, and no significant noise or air quality impacts are anticipated (see Section 3.5, **Environmental Health**, for details).

It is likely that residents would need a vehicle to access employment and services (e.g. medical and financial), and for grocery shopping. Public transit is available to both sites (e.g., on Texas Way W, which passes through the Fort Lawton site, and on 34th Avenue W near the site; and on NE 45th Street one block north of the Talaris site) and would provide

access to services and employment opportunities in other parts of the city. King County Metro is planning for “frequent” bus service along a route that includes W Government Way and 34th Avenue W by 2040, and for RapidRide service on NE 45th Street and Sandpoint Way NE by 2025. Shuttle service could be provided to improve access to the sites; van service could also be provided as part of the project for senior supportive housing and possibly for the other affordable housing onsite (see Section 3.10, **Transportation**, and **Appendix I** for details). Public schools are nearby, including Lawton Elementary and Laurelhurst Elementary, close to the Fort Lawton and Talaris sites, respectively (see Section 3.11, **Public Services**, for details).

Development of senior supportive housing under Alternatives 1, 2 and 3 would include the provision of a comprehensive package of services for resident stability and well-being, including case management services provided onsite by Catholic Community Services of Western Washington and residential counselors who would be available onsite 24 hours a day. The provision of these on-site services would help reduce the commuting needs of the residents (see **Chapter 2** for details).

Parks and Open Space

P 1.1 – Continue to expand the City’s park holdings and open space opportunities, with special emphasis on serving urban centers and urban villages that are home to marginalized populations and areas that have been traditionally underserved.

P 1.2 – Provide a variety of parks and open space to serve the city’s growing population consistent with the priorities and level of service standards identified in the City’s Park Development Plan.

P 1.13 – Make the most of limited available land by developing parks and open spaces so that they can accommodate a variety of active and passive recreation uses.

P 2.7 – Provide athletic fields that can serve as places where people of diverse ages, backgrounds, and interests can engage in a variety of sports.

Discussion: Under Alternatives 1 and 2, public park uses would be provided on the Fort Lawton site, including active park facilities, preserved existing natural areas and conversion of an existing structure to a park maintenance facility. The active park facilities would include two or three unlit, multi-purpose fields under Alternatives 1 and 3, respectively. The parks facilities would be designed to SPR standards and would be available to the surrounding community. The park uses under Alternative 1 would be provided together with affordable housing on the Fort Lawton site. Under Alternative 2, no public park uses would be provided on either the Fort Lawton or Talaris sites (see **Chapter 2** for details).

The City’s adopted LOS for parkland from the 2017 Parks and Open Space Plan is 8 acres per 1,000 residents. Based on the number of residents estimated under Alternative 1 and 3 (586 people) and the citywide LOS guidelines, there would be demand for approximately 4.7

acres of parks and recreation facilities. The new demand could be satisfied by the dedication of approximately 4.7 acres of land owned by the U.S. Army at the Fort Lawton site to Discovery Park, as well as the provision of passive recreation areas and active recreation areas onsite for use by the proposed development and the public. Alternative 2 would generate less demand for parks and recreation facilities than Alternatives 1 and 2. (see Section 3.8, **Recreation and Open Space**, for details)

City of Seattle Consolidated Plan for Housing and Community Development, 2014-2017

Summary: *The Consolidated Plan for Housing and Community Development is a four-year plan, updated annually, which outlines Seattle's housing and community development needs, and provides strategies for meeting identified needs. The Plan also provides policy guidance for implementing City programs funded by four U.S. Department of Housing and Urban Development (HUD) grants.*

The three primary HUD goals outlined in the 2014-2017 Plan are:

- *Homeless prevention, intervention and housing stability*
- *Increase access to affordable housing*
- *Economic and neighborhood development.*

City of Seattle strategies for achieving these goals include:

- *Support the delivery of emergency shelter and related services for homeless persons and families*
- *Develop and preserve affordable rental and ownership housing*
- *Support low- and moderate-income neighborhoods, businesses and business districts with infrastructure and economic development assistance*
- *Support job training activities as part of anti-poverty strategies*

Discussion: Under Alternatives 1, 2 and 3, affordable housing for low-income and formerly homeless households would be provided on the Fort Lawton site or Talaris site. See the discussion under the Seattle Comprehensive Plan - Housing for details on the types of affordable housing and the populations served. The senior supportive housing would include the provision of a comprehensive package of services focused on resident stability and well-being, including case management services provided onsite by Catholic Community Services of Western Washington and residential counselors who would be available onsite 24 hours a day (see **Chapter 2** for details).

City of Seattle Land Use Code

Summary: *The City of Seattle Department of Construction and Inspections administers a land use code that regulates the type and scale of development within the City. The*

following is an overview of the zoning and development code requirements for the Fort Lawton and Talaris sites, together with discussion of project consistency with these regulations.

Fort Lawton Site

Existing Zoning – According to the Seattle Land Use Code, the Fort Lawton site is zoned Single-family 7200 (SF 7200). The SF 7200 zoning classification provides for single-family housing with one dwelling unit allowed per lot, and a minimum lot size of 7,200 sq. ft. While single-family residential uses are the primary uses allowed in this zone, other uses are allowed outright by the Seattle Municipal Code, including nursing homes and adult family homes.

Proposed Zoning – The City of Seattle is currently considering legislation to amend development standards for all lowrise zones. The Lowrise 1 (LR1) zone provides opportunities for low-density multi-family housing (primarily rowhouse and townhouse developments) through infill development that is compatible with single-family residences. The Lowrise 2 (LR2) zone provides opportunities for a variety of multi-family housing in existing multi-family neighborhoods and along arterials that have a mix of small scale residential structures. LR2 zones are most appropriate in an urban center or urban village, or near an urban center or urban village with small-scale structures no more than 35 feet that are compatible in scale with SF and LR1 zones or would provide a transition between SF and LR1 zones.

Discussion: Under Alternatives 1, development of multi-family, affordable housing on the Fort Lawton site would require a rezone to lowrise residential zoning (e.g., Lowrise 3), and approval of any necessary amendments to Subchapter II of Chapter 23.34 to accommodate such a rezone. The rezone could be accomplished through a legislative rezone process. A rezone proposal would be prepared, City staff would review the proposal, and City Council approval would be required. A rezone to a lowrise residential classification would be consistent with the existing Multi-Family Residential Comprehensive Plan designation of the site. The proposed zoning for the Fort Lawton site would have compatible density levels and land use types as are possible in the existing multi-family Lowrise 3 zoning along W Government Way to the southeast of the site.

Potential development on the Fort Lawton site under Alternative 2 (market-rate single-family housing) and Alternative 3 (active and passive park uses) would be consistent with the existing SF 7200 zoning and no rezone would be required.

Talaris Site

Existing Zoning – According to the Seattle Land Use Code, the Talaris site is zoned Single-family 5000 (SF 5000). This zoning classification provides for single-family housing at one dwelling unit per lot, with a minimum lot size of 5,000 sq. ft. Single-family residential uses

are the primary uses allowed in this zone, other uses are allowed outright by the Seattle Municipal Code, including nursing homes and adult family homes.

Proposed Zoning – See the discussion of proposed zoning above under Fort Lawton.

Discussion: Under Alternatives 2 and 3, development of multi-family, affordable housing on the Talaris site would require a rezone to lowrise residential zoning (e.g., Lowrise 3), and approval of any necessary amendments to Subchapter II of Chapter 23.34 to accommodate such a rezone. The rezone process would be similar to that described above for the Fort Lawton site. Due to the Talaris site's Single-family Residential Comprehensive Plan designation, a Comprehensive Plan amendment would also be required to allow for a rezone to a lowrise residential classification. A rezone to a lowrise residential zoning would be an extension of the existing multi-family residential uses and zoning to the north of the site.

Chapter 23.34 – Amendments to Official Land Use Map - Rezones

Summary: *DMC 23.34.008 sets forth the general rezone criteria for rezoning property within the city of Seattle. These criteria include consideration of: zoned capacity in urban centers and urban villages; characteristics of the area to be rezoned; zoning history of the site/site area; neighborhood plan; zoning principle; negative and positive impacts; service capacities; changed circumstances; overlay districts; and critical areas.*

Discussion: As described above, a rezone of the Fort Lawton or Talaris site would be required for the proposed multi-family, affordable housing under Alternatives 1, 2 and 3. When an application for a rezone is made, the relationship of the project to the criteria in DMC 23.34.008 will be evaluated.

Environmentally Critical Areas

Summary: *Washington State's Growth Management Act (Chapter 36.70A RCW) requires all cities and counties to identify critical areas within their jurisdictions and to formulate development regulations for their protection.*

The City of Seattle has adopted codes (SMC 25.09) to define and regulate critical areas to avoid adverse environmental impacts and potential harm on the parcel and to adjacent property, the surrounding neighborhood, and the drainage basin. SMC 25.09.020 defines six types of environmentally critical areas including: geologic hazard areas, steep slope areas, flood-prone areas, wetlands, fish and wildlife habitat conservation areas, and abandoned landfills.

Discussion: On the Fort Lawton site, the following critical areas have been identified: geologic hazards (steep slopes, seismic and erosion); wetlands (potentially); and fish and wildlife conservation area (including a heron management area). On the Talaris site, the following critical areas have been identified: geologic hazards (steep slopes, seismic,

erosion, methane buffer from adjacent former landfill); wetlands; fish and wildlife habitat conservation area (including an eagles nest site); and a riparian corridor. The potential for proposed development under Alternatives 1, 2 and 3 to impact these critical areas is discussed in Section 3.1, **Earth**, and Section 3.2 **Biological Resources**, and **Appendices B** and **C**. These analyses concluded that with implementation of the legally-required measures and measures that are part of the project, no significant adverse impacts to critical areas are expected.

Tree Protection Ordinance

Summary: *The City of Seattle regulates activities that affect trees through Seattle Municipal Code (SMC) Chapter 25.11 – Tree Protection. The City adopted a new tree protection ordinance amending this portion of the code, which became effective on April 1, 2009. In addition, DPD Director’s Rule 16-2008 was implemented to clarify the definition of ‘exceptional tree,’ and to clarify the City’s SEPA Plants and Animals Policy (SMC subsection 25.05.675.N.2.c) relative to ‘rare, uncommon, unique or exceptional’ trees.*

Four categories of trees are identified under these regulations:

- *Significant trees, which are defined as any tree greater than or equal to 6 inches DSH (diameter at standing height) for both evergreen and deciduous trees;*
- *Tree groves which are defined as a group of 8 or more trees 12 inches in diameter or greater that form a continuous canopy;*
- *Hazardous trees; and*
- *Exceptional trees, which are a tree or group of trees that, because of its unique historical, ecological or aesthetic value constitutes an important community resource.*

The ordinance prohibits removal of ‘exceptional trees’ and limits the removal of trees six inches in diameter (at breast height [DBH]) or larger on lots in specific zones, except in conjunction with a building or grading permit. SMC 25.11.090 provides requirements for tree replacement and site restoration.

Discussion: Mature trees are present on both the Fort Lawton and the Talaris sites. Prior to development on either site, a tree survey would be prepared to determine the presence of any significant trees, tree groves, hazard trees and/or exceptional trees in the development areas. To the extent feasible, existing trees would be preserved. Where removal of significant trees, tree groves, hazard tree or exceptional trees is necessary, the requirements in the Tree Protection Ordinance would be followed.

Discovery Park Master Plan

Summary: *The Discovery Park Master Plan guides decisions regarding the development of Discovery Park, currently a 534-acre natural area park in northwest Seattle. The Master Plan was first drafted in 1972, and updated in 1974 and 1986, as described in more detail below.*

In 1972, a consultant prepared, but the City Council took no action on, a “final report on the Master Plan for Fort Lawton Park”. The 1972 Plan noted the presence of the Fort Lawton Army Reserve Center, but on the assumption that the City would acquire the Reserve property, which was then retained for ongoing use by the federal government. The plan called for a grand mall within the park and running through the northern Reserve property to an entry that would connect to Gilman Avenue W via a bridge crossing the Kiwanis Ravine.

In 1974, the Council adopted, by resolution, a “Revised Master Plan for Discovery Park”. The purpose of the 1974 Plan was to reevaluate certain elements of the 1972 Plan. Among the revisions were: a recognition that the proposed entrance via a bridge over the Kiwanis Ravine was not practical at that point and a recommendation for a main entrance at Government Way W. The “Long Range” map in the 1974 Plan displayed the Reserve property as the only “Army Retained Area” on the map, with just a small portion of land northwest of that area displayed as “Army Property Requested for Park Use.” In 1986, the Council revised the plan again by resolution. The 1986 Plan noted the expectation of long term Reserve use of the areas adjacent to the northeast corner of the park and did not amend the “Long Range” map in the 1974 Plan.

The concept of a main entry on the axis of the grand mall via a bridge across the Kiwanis Ravine has not gained ground through subsequent years, and is no longer viable. After the adoption of the 1986 Plan, the City Council took several steps to preserve the Kiwanis Ravine as a park, authorizing acquisition of property in the ravine for park purposes, transferring the street rights of way over the ravine—including Gilman—to the Parks Department, and (in 2007) deeming the ravine “important open space and heron habitat” and imposing on it a restrictive easement that limits its use to park purposes. In addition, in the late 1990s, the federal government built a new facility in the northwest quadrant of the Reserve property, directly in the path of the originally envisioned grand mall, for use by the Department of Veterans Affairs.

*In September 2008, the Seattle City Council passed a resolution adopting the Fort Lawton Army Reserve Center Redevelopment Plan and approving related applications to the federal government for the Army Reserve Property⁴. In *Magnolia Neighborhood Planning Council v. City of Seattle*, 155 Wash.App. 305 (2010), a neighborhood group challenged the City’s 2008 adoption of a Fort Lawton Redevelopment Plan (FLRP) and contended that the FLRP was inconsistent with the 1986 Discovery Park Master Plan. The Court of Appeals agreed with*

⁴ Resolution Number 31086.

the City that the 1986 Master Plan created no enforceable right or duty and that the trial court erred in ruling that the City was required to publicly determine the applicability of the Master Plan to the FLRP.

Discussion: As noted above, the Court of Appeals determined that the City was not required to publicly determine the applicability of the Discovery Park Master Plan to the Fort Lawton Redevelopment Plan. Moreover, the vision contemplated in the plan of a bridge over the Kiwanis Ravine is no longer viable. However, it should be noted that under Alternatives 1 and 3, public parks would be provided on the Fort Lawton site, including passive and active recreation areas. Up to 4.7 acres of forestland owned by the U.S. Army in the west portion of the Fort Lawton site could also be dedicated to Discovery Park under these alternatives. No public parks would be included under Alternative 2.

Federal Plans, Policies and Regulations

U.S. Department of Housing and Urban Development

Summary: *The Department of Housing and Urban Development's (HUD) NEPA environmental review procedures for entities assuming HUD environmental review, decision-making, and action responsibilities under NEPA and related federal laws and authorities are contained in Title 24, Part 58 of the Code of Federal Regulations (CFR). These regulations provide instruction and guidance to recipients of HUD assistance and other responsible entities for conducting an environmental review and for obtaining approval of a Request for Release of Funds. The City of Seattle Human Services Department is the responsible entity under 24 CFR 58 for environmental review, decision-making and action responsibilities that would otherwise apply to HUD, under a delegation agreement between the City of Seattle and HUD.*

Discussion: Should federal funding become available for the Fort Lawton Project, NEPA environmental review would be conducted. The NEPA review would be prepared consistent with HUD's environmental review procedures as outlined in Title 24, Part 58 of the CFR, and would likely incorporate analysis from this SEPA EIS.

Summary: *HUD's basic regulation for responsible entities assuming HUD environmental review decision-making, and action responsibilities that implement the National Environmental Policy Act (NEPA), the regulations of the Council on Environmental Quality (CEQ) and other related Federal environmental laws and authorities are contained in Title 24, Part 58 of the Code of Federal Regulations (CFR).*

The responsible entity must certify that it has complied with the requirements that would apply to HUD under the following law and authorities, and must consider the criteria, standards, policies and regulations of the following laws and authorities:

(a) Historic properties.

(1) The National Historic Preservation Act of 1966.

- (2) *Executive Order 11593, Protection and Enhancement of the Cultural Environment*, May 13, 1971 (3 CFR, 1971--1975 Comp., p. 559).
- (3) *The Archaeological and Historic Preservation Act of 1974, which amends the Reservoir Salvage Act of 1960* (16 U.S.C. 469 et seq.).
- (4) *Procedures for the Protection of Historic and Cultural Properties* (Advisory Council on Historic Preservation--36 CFR part 800).
- (b) *Floodplain, management and wetland protection.*
 - (1) *Flood Disaster Protection Act of 1973* (42 U.S.C. 4001-4128) and the *National Flood Insurance Reform Act of 1994*.
 - (2) *HUD Procedure for the Implementation of Executive Order 11988* (3 CFR, 1977 Comp., p. 117)-24 CFR part 55, *Floodplain Management*.
 - (3) *Executive Order 11990 (Protection of Wetlands)*, (3 CFR, 1977 Comp., p. 121).
- (c) *Coastal areas protection and management.*
 - (1) *The Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990* (16 U.S.C. 3501 et seq.).
 - (2) *The Coastal Zone Management Act of 1972* (16 U.S.C. 1451 et seq.), as amended.
- (d) *Sole source aquifers. The Safe Drinking Water Act of 1974* (42 U.S.C. 201, 300 et seq., and b 21 U.S.C. 349), as amended. (See 40 CFR part 149.)
- (e) *Endangered species. The Endangered Species Act of 1973* (16 U.S.C. 1531 et seq.), as amended. (See 50 CFR part 402.)
- (f) *Wild and scenic rivers. The Wild and Scenic Rivers Act* (16 U.S.C. 1271 et seq.), as amended.
- (g) *Air quality. The Clean Air Act* (42 U.S.C. 7401 et seq.), as amended. (See 40 CFR parts 6, 51, and 93.)
- (h) *Farmlands protection. The Farmland Protection Policy Act of 1981* (7 U.S.C. 4201 et seq.), as amended. (See 7 CFR part 658.)
- (j) *HUD environmental standards. Applicable criteria and standards specified in HUD environmental regulations* (24 CFR part 51) and *HUD policy set forth in 24 CFR 58.5(i)(2)*.
- (j) *Environmental justice. Executive Order 12898--Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations* (3 CFR, 1994 Comp., p. 859).

Discussion: See the discussion below under National Historic Preservation Act, Section 3.9, **Historic and Cultural Resources**, and **Appendix H**, for a description of the project's compliance with federal laws, regulations and procedures related to historic properties.

Neither the Fort Lawton site nor the Talaris site is located within a floodplain. Thus, development at the sites is not subject to the flood-related federal laws, regulations and procedures listed above. An existing wetland has been identified in the south portion of the Talaris site and a wetland may be located in the north portion of the Fort Lawton site. See Section 3.2, **Biological Resources**, and **Appendix C**, for information on the protection of this wetland/potential wetland with proposed development under the EIS alternatives.

Neither the Fort Lawton site nor the Talaris site is located within a Coastal Barrier area. Thus, development at the sites is not subject to the Coastal Barrier Resources Act. King County is designated as part of the coastal zone and is subject to the Coastal Zone Management Act (see below for information on CZM compliance). No sole source aquifer is located beneath either site. Thus, development at the sites is not subject to the Safe Drinking Water Act.

No federally-listed species or federally-designated critical habitat is present on or immediately adjacent to either of the sites. Thus, development at the sites would not affect the species/habitat. See below under the Endangered Species Act, Section 3.2, **Biological Resources**, and **Appendix C**, for further discussion of this federal law.

The Fort Lawton and Talaris sites are not located in proximity to a Wild and Scenic River. Thus, development on the sites is not subject to the Wild and Scenic Rivers Act. See below for a discussion of compliance with the Federal Water Pollution Control Act and Section 3.12, **Utilities**.

See below and Section 3.3, **Air Quality**, and **Appendix D**, for information on the project's relationship to the Clean Air Act and other local and state air quality regulations.

The Fort Lawton site is designated Multi-Family Residential in the *Seattle 2035 Comprehensive Plan* and is zoned SF 7200; the Talaris site is designated Single-family Residential in the Comprehensive Plan and is zoned SF 5000. No farmland is present on either site and development on the sites is not subject to the Farmland Protection Policy Act.

Proposed development under the EIS alternatives is not expected to result in disproportionate impacts on minority or low-income populations. Very few low-income or minority populations are located in the Fort Lawton or Talaris site vicinities and the minority populations that do, do not meet U.S. EPA's definition of such a population (see Section 3.14, **Environmental Justice**, for details).

Summary: *The Department of Housing and Urban Development (HUD) provides environmental standards for determining project acceptability and necessary measures to ensure that activities assisted by HUD achieve the goal of a suitable living environment. The environmental criteria, encompassed in 24 CFR Part 51 include noise abatement and control and the siting of HUD-assisted projects near hazardous operations including explosives, flammables, runway clear zones at civil airports, and accident potential zones at military airfields. In addition, as set forth in 24 CFR 58.5(i)(2), it is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended use of the property.*

Discussion: Section 3.4, **Noise**, and **Appendix E**, include observations of existing noise levels and an analysis of potential noise impacts that could occur on the Fort Lawton and Talaris sites under the EIS alternatives. The analysis concluded that with implementation of legally-required measures, the project is not expected to result in significant noise impacts. The sites are also not located in areas with substantial noise that could impact proposed development.

Neither the Fort Lawton nor the Talaris site is located in proximity to hazardous operations including explosives, flammables, runway clear zones at civil airports or accident potential zones at military airfields. See Section 3.5, **Environmental Health**, and **Appendix F**, for a summary of potential environmental health hazards on and near the sites and potential impacts that could occur under the EIS alternatives. The analysis concluded that with implementation of legally-required measures, the project is not expected to result in significant environmental health impacts.

Clean Air Act

Summary: *The Clean Air Act is a federal law intended to protect public health and the environment from dangerous air pollution. The Act regulates air emissions from stationary and mobile sources and authorizes the EPA to establish National Ambient Air Quality Standards (NAAQSs). The EPA designates locations not meeting NAAQSs as a U.S. EPA Nonattainment Area, and prohibits federal assistance to projects that are not in conformance with the air quality State Implementation Plan to bring areas back into compliance with NAAQSs, or attainment Maintenance areas are attainment areas previously designated as nonattainment areas. New construction and conversion in “non-attainment” or “maintenance” areas as designated by the EPA may need to be modified or mitigation measures developed and implemented.*

Discussion: Both the Fort Lawton and Talaris sites are located in King County. The County is designated an attainment area for ozone, NO₂, PM₁₀ and PM_{2.5}, and is designated a maintenance area for CO. Existing traffic on major roadways in the vicinities of the Fort Lawton and Talaris sites is a large contributor to criteria pollutant emissions. Development under the EIS alternatives is not expected to generate significant levels of mobile sources of air toxic emissions, and with implementation of legally-required measures, no significant adverse impacts on air quality are expected (see Section 3.3, **Air Quality**, and **Appendix D**, for additional information on the project’s relationship to the Clean Air Act and local and state air quality regulations).

Clean Water Act (Federal Water Pollution Control Act)

Summary: *The Clean Water Act (CWA) is a federal statute that protects surface water quality through a variety of tools to reduce direct pollutant discharges into waterways and manage polluted runoff. The CWA prohibits discharging pollutants from a point source (i.e.*

pipe, ditch etc.) into navigable waters unless an EPA National Pollutant Discharge Elimination System (NPDES) permit is obtained.

Discussion: The Washington Department of Ecology has local jurisdiction over the Clean Water Act. Stormwater regulation for the Fort Lawton Project is per the Seattle Stormwater Code (SMC 22.800) and the associated guidance in the 2016 *City of Seattle Stormwater Manual*. These documents identify code regulations in compliance with the Phase I NPDES permit and provide guidance for the application and design of stormwater Best Management Practices (BMPs) and infrastructure facilities. See Section 3.12, **Utilities**, for details on the project's relationship to local and state stormwater regulations.

Endangered Species Act

Summary: *Section 7 of the Endangered Species Act (ESA) is administered by the United States Fish and Wildlife Service (USFWS) and the National Oceanographic and Atmospheric Administration (NOAA). The ESA, as amended, applies to federal agency actions and sets forth requirements for consultation to determine if the proposed action "may affect" an endangered or threatened species and their critical habitat. If an agency determines that an action "may affect" a threatened or endangered species or critical habitat, then Section 7(a)(2) requires each agency, generally the lead agency, to consult with the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS) (the Services), as appropriate, to ensure that any action the agency authorizes, funds or carries out is not likely to jeopardize the continued existence of any federally listed endangered or threatened species, or result in the destruction or adverse modification of critical habitat. If a species has been proposed for federal listing as threatened or endangered, or a critical habitat has been proposed, Section 7(a)(4) states that each agency shall confer with the Services.*

Discussion: An analysis of biological resources on the Fort Lawton and Talaris sites is provided in Section 3.2, **Biological Resources**, and **Appendix C**. The analysis indicated that no federally-listed species and no federally-designated critical habitat are known to occur on or immediately adjacent to either of the sites. Thus, development at the sites is not expected to affect these species/habitats.

Migratory Bird Treaty Act

Summary: *The Migratory Bird Treaty Act (MBTA) prohibits private parties (and federal agencies in certain judicial circuits) from intentionally taking a migratory bird, its eggs, or nests. "Take" is defined as "pursue, hunt, shoot, wound, kill, trap, capture, or collect" (50 CFR §10.21). The MBTA prohibits taking, selling, or other activities that would harm migratory birds, its eggs or nests, unless the U.S. Secretary of the Interior, through the USFWS, authorizes such activities under a special permit. Part 724 FW 1-2 of the USFWS Service Manual (USFWS 2003) states that for migratory birds other than eagles and endangered or threatened species, a permit is not required to dislodge or destroy migratory bird nests that are not occupied by juveniles or eggs. However, any such destruction that*

results in a take of any migratory bird is a violation of the MBTA (e.g., where juveniles still depend on the nest for survival).

Discussion: An analysis of biological resources (including migratory birds) on the Fort Lawton and Talaris sites is provided in Section 3.2, **Biological Resources**, and **Appendix C**. As mentioned above, no federally-listed wildlife species, including birds, are located on or adjacent to the sites. The analysis indicated that the north forest on the Fort Lawton site and Kiwanis Memorial Preserve Park adjacent to the site are considered great blue heron breeding areas, and bald eagle breeding areas and a purple martin breeding site are mapped nearby (these are bird species of local or state importance). A bald eagle nest site is mapped on the Talaris site. Legally-required measures and measures that are part of the project are identified to address potential impacts of the project on these breeding areas and other potential impacts on migrating birds. As a result, no significant impacts are expected.

Executive Order 13112, Invasive Species

Summary: *Pursuant to Executive Order 13112, Invasive Species, enacted in February 3, 1999, federal agencies whose actions may affect the status of invasive species (alien species whose introduction does or is likely to cause economic or environmental harm to human health) are directed to use relevant programs and authorities, to the extent practicable and subject to available resources, to prevent the introduction of invasive species, and provide for restoration of native species and habitat conditions in ecosystems that have been invaded. Agencies are not to carry out actions that they believe are likely to cause or promote the introduction or spread of invasive species unless the benefits of such actions clearly outweigh the potential harm, and all feasible and prudent measures to minimize risk of harm should be taken in conjunction with the actions.*

Discussion: Invasive plant species currently occur on the Fort Lawton and Talaris sites, including Himalayan blackberry, English ivy and Scotch broom. As possible, these species would be removed prior to redevelopment of either site. The EIS alternatives are not expected to cause or promote the introduction or spread of invasive species. Native, noninvasive and drought-tolerant plants would be incorporated into the landscaping under Alternative 1 and 3. Under Alternative 2, landscaping on the Fort Lawton site would be at the discretion of homebuilders and homeowners (see Section 3.2, **Biological Resources**, and **Appendix C**, for additional information on invasive species).

National Historic Preservation Act

Summary: *The National Historic Preservation Act of 1966 (Section 106) requires federal agencies or federally assisted undertakings to consider the effect of their undertakings on any district, site, building, structure or object that is included in or eligible for inclusion in the National Register of Historic Places. The process includes consultation between the lead agency and other parties with an interest in the effects of the proposed project on historic*

properties. Agencies are also required to afford the Advisory Council on Historic Preservation “a reasonable opportunity to comment about such undertaking.”

Discussion: An analysis of historic resources on the Fort Lawton and Talaris sites is provided in Section 3.9, **Historic and Cultural Resources**, and **Appendix H**, including any site features that are listed or eligible for listing on the National Register of Historic Places (NRHP). The analysis indicated that the Final Environmental Assessment for Fort Lawton U.S. Army Reserve Center (2012) determined that the Fort Lawton site was not eligible for listing in the NRHP. The analysis noted that the buildings and landscaping at the Talaris site were designated as an historic landmark by City of Seattle and the site has been determined eligible for listing in the NRHP. The buildings and landscaping on the Talaris site are also considered to have local and national significance. With implementation of legally-required measures and measures that are part of the project, the analysis concluded that the project is not expected to result in significant historic or cultural resources impacts.

3.7 AESTHETICS/VISUAL RESOURCES

This section of the DEIS describes the aesthetics/visual resource conditions on and near the Fort Lawton and Talaris sites. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified. The section is based on photo simulations and shadow diagrams prepared by Tiscareno Architects in October 2017 (see **Appendix G** for the simulations and diagrams).

Key Findings

The existing visual character of the Fort Lawton site is defined by its location on Magnolia bluff and its collection of former military buildings and grassy/vegetated natural areas. The existing visual character of the Talaris site is defined by the historic conference center buildings that are located within a park-like setting.

Under Alternatives 1 and 3, most of the existing buildings on the Fort Lawton site would be removed; under Alternative 2, all of the existing buildings would be removed. Development on the site would change the visual character of the site with new townhouses, rowhouses and apartment buildings and open space/park facilities under Alternative 1, single-family housing under Alternative 2 and open space/park facilities under Alternative 3. New sources of light, glare and shadows would be generated by development under Alternatives 1, 2 and 3; however, the amount of spillage onto off-site areas is anticipated to be minimal. No protected views, as defined in SMC 25.05.675.P.2.a, 2.b. and 2.c., would be impacted with proposed development.

Under Alternatives 2 and 3, no buildings would be removed on the Talaris site. Proposed Development would change the visual character of the site with new townhouses, rowhouses and apartment buildings. New sources of light, glare and shadows would be generated by development under Alternatives 2 and 3; however, the amount of spillage onto off-site areas is anticipated to be minimal. No protected views, as defined in SMC 25.05.675.P.2.a, 2.b. and 2.c., would be impacted with proposed development.

Methodology

Visual Character

For the aesthetics analysis in this DEIS, the visual character of an area consists of the unique and important aesthetic features that comprise the visual landscape. Both natural and built features combine to define a location's visual character, including natural resources (topography, vegetation, geologic formations, wetlands, rivers and other water resources), view corridors, vistas, parks and landmark structures/districts.

Views

A view analysis was prepared for this DEIS based on photographs taken of the Fort Lawton site from selected viewpoints and photo simulations of proposed development under the

EIS alternatives from these viewpoints. The viewpoints for the visual analysis were identified based on several factors, including the City's view protection policies in SMC 25.05.675.P.2.a, 2.b. and 2.c. (e.g., specified viewpoints, parks, scenic routes and historic landmarks where the site and proposed development could be seen) and other public places with possible views of the site. The designated viewpoints include: Discovery Park and Commodore Park; designated landmarks include: Hiram Chittendon Locks and Salmon Bay Bridge; and designated scenic routes include: W Commodore Way and Seaview Avenue NW. Other public locations from which the site could be viewed include public roadways/sidewalks surrounding the site (e.g., W Lawton Way, 36th Avenue W and W Government Way). Accordingly, ten preliminary viewpoints were selected based on the City's view protection regulations and the potential for site development to change the character of public views of the site (see **Figure 3.7-1**, Viewpoint Location Map for the locations of the viewpoints and **Appendix G** for photos from these preliminary viewpoints).

From these viewpoints, four viewpoints (Viewpoints 2, 3, 6 and 9) were ultimately selected for simulation based on the actual potential for view impacts with proposed development. 3D photo simulations of the views of site redevelopment under the EIS alternatives from the selected viewpoints were prepared. SketchUp or Revit software was used to represent building massing based on assumed building elevations, locations and heights. The view analysis presented in this DEIS includes figures that incorporate the following:

- Photographs illustrating the existing visual condition as viewed from the respective viewpoints; and
- Simulations of building massing envelopes representing the extent of building massing visible from the respective viewpoint, consistent with assumed total building square footage, setbacks and maximum heights. The building massing envelopes represent vertical extensions of the building footprints illustrated in **Figure 2-6B**, Fort Lawton Site Plan – Alternative 1 and **Figure 2-10**, Fort Lawton Site Plan – Alternative 2 in **Chapter 2** of this DEIS, and are intended to represent the general bulk and scale of proposed development under these alternatives. Photo simulations of Alternative 3 were not prepared, as no new building development is proposed on site that could block views under this alternative.

Potential view impacts of development under Alternatives 2 and 3 at the Talaris site are generally discussed based on **Figure 2-9**, Massing Diagrams and **Figure 2-11**, Talaris Site Plan – Alternatives 2 / 3 in **Chapter 2** of this DEIS, and do not include photo simulations.

Light and Glare

Potential light and glare impacts were conceptually analyzed based on the type and sources of light under the EIS alternatives and the potential for light/glare impacts on and near the Fort Lawton and Talaris sites.

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Note: This figure is not to scale

Source: SMR Architects, 2017.

Figure 3.7-1
Fort Lawton Viewpoint Location Map

Shadows

Potential shadow impacts from proposed development at the Fort Lawton site on nearby parks were analyzed per the City's SEPA policies (SMC 25.05.675.Q.2). These policies aim to "minimize or prevent light blockage and the creation of shadows on open spaces most used by the public." Shadow diagrams were prepared that depict the potential shading impacts from the project, including on Discovery Park, Kiwanis Memorial Preserve Park and Commodore Park. Shadow diagrams were prepared during the summer solstice (approximately June 21st), autumnal equinox (approximately September 21st) and winter solstice (approximately December 21st). Diagrams were prepared for three times of day (9 AM, 12 PM and 3 PM) under Alternatives 1 and 2 (the alternatives with new building development) to illustrate how shadows would transition across the site on each of the days referenced above and possibly impact the parks (see **Appendix G** for each of the shadow diagrams prepared for this DEIS). Potential shadow impacts on nearby public open spaces was qualitatively discussed for the Talaris site.

3.7.1 Affected Environment

This sub-section summarizes the existing aesthetic/light and glare conditions at the Fort Lawton and Talaris sites.

Fort Lawton Site

Visual Character

The existing visual character of Fort Lawton site is defined by its location on Magnolia bluff and its collection of former military buildings and grassy/vegetated natural areas. Existing buildings on the site are one- to two-stories in height and are generally constructed with brick, stone, wood and/or metal facades. They are typically minimalist in appearance, in accordance with their former storage and maintenance uses.

To the west and south of the site, the visual character is defined by the primarily forested/vegetated portions of Discovery Park. The Fort Lawton Army Reserve Complex (FLARC) VA center is also located to the west of the site. The FLARC is a two-story building with a primarily brick façade.

The visual character of the areas to the north and east of the Fort Lawton site is generally defined by the existing single-family residential neighborhoods. Existing residences are typically two- to three-story, wood frame structures.

Views

The City of Seattle has adopted policies to: *"protect public views of significant natural and human-made features: Mount Rainier, the Olympic and Cascade Mountains, the downtown skyline, and major bodies of water including Puget Sound, Lake Washington, Lake Union and the Ship Canal, from public places consisting of specified viewpoints, parks, scenic routes and*

view corridors identified in Attachment 1".¹ It is also the City's policy to protect public views of City-designated historic landmarks, views of the Space Needle from designated public places and views from City-designated scenic routes.

City-Designated Public Viewpoints

Of the City's 97 officially-designated public viewpoints, two are near the Fort Lawton site and could potentially be impacted by proposed development: Discovery Park and Commodore Park. The locations of these viewpoints are depicted on **Figure 3.7-1, Viewpoint Location Map** and are described below:

- **Discovery Park** – Discovery Park is located at the north tip of Elliott Bay and is adjacent to the west and south boundaries of the Fort Lawton site. The approximately 534-acre park includes panoramic views of Puget Sound, the Olympic Mountains, the Cascade Mountains and Mount Rainier. Three designated viewpoint areas are located within the park:
 - The West Point Lighthouse – located on the west edge of the park, provides panoramic views to the north, south and west;
 - The Fort Lawton Historic District – located in the south portion of the park, provides panoramic views to the north, west and southwest; and
 - The Daybreak Star Center – located in the north portion of the park, provides panoramic views to the north, east and west.

Views of the Fort Lawton site are not possible from any of the designated viewpoint areas in Discovery Park due to the intervening distance, topography and vegetation. However, the site can be seen from the park boundary to the west of the site, and this location was included in the view analysis (see the photos in **Appendix G**).

- **Commodore Park** – Commodore Park is located less than 0.25 mile to the northeast of the Fort Lawton site, along the south shore of the Lake Washington Ship Canal. The approximately 3.9-acre park provides panoramic views of the Canal and secondary views of Puget Sound to the west. There are two designated viewpoint locations within the park, one on the east side and the other on the west side of the park. Views of the Fort Lawton site are not possible from the designated viewpoint areas in Commodore Park due to the intervening distance, topography, vegetation and buildings (see the photos in **Appendix G**). Therefore, photo simulations of proposed development were not prepared from this viewpoint.

Views of City-Designated Historic Landmarks

In addition to view protection policies associated with officially-designated viewpoints, it is also City policy to: *protect public views of historic landmarks designated by the City's Landmarks Preservation Board which, because of their prominence of location or contrasts of*

¹ Seattle Municipal Code Chap. 25.05.675 P.2.a.i. Attachment 1 is at the end of Section 25.05.675.

siting, age or scale are easily identifiable visual features of their neighborhood or the City and contribute to the distinctive quality or identity of their neighborhood or the City.² There are two designated City Landmarks adjacent to the site: the Hiram Chittendon Locks and the Salmon Bay Bridge. These historic landmarks are depicted on **Figure 3.7-1**, Viewpoint Location Map and are described below:

- **Hiram Chittendon Locks** – The Hiram Chittendon Locks are located approximately 0.1 mile north of the Fort Lawton site and were constructed from 1911 to 1917 to move boats from the water level of Lake Washington and Lake Union to Puget Sound, and to maintain the water levels of both lakes. The Hiram Chittendon Locks were listed on the National Register of Historic Places in 1978.
- **Salmon Bay Bridge** – The Salmon Bay Bridge is located approximately 0.1 mile north of the Fort Lawton site and was constructed in 1914 by the Great Northern Railroad Company to provide a rail connection between Ballard and Magnolia. It serves as a prominent visual feature on the Lake Washington Ship Canal and is the only railroad bridge across the canal. The bridge was designated as a City of Seattle Landmark in 1980.

Views of the Hiram Chittendon Locks and Salmon Bay Bridge are largely not available from the Fort Lawton site due to the intervening distance, topography, vegetation and buildings—only the top of the bridge can be seen (see the photos in **Appendix G**). Therefore, photo simulations of proposed development were not prepared from these viewpoints.

Space Needle Viewpoints

The most visible landmark from many parts of the City is the Space Needle, which is located approximately 3.8 miles southeast of the Fort Lawton site. The City has identified ten viewpoints from which views of the Space Needle are to be protected.³ These viewpoints are located to the south and southeast of the Fort Lawton site. The designated Space Needle view corridor that is closest to the project site is Kerry Park.⁴ This view corridor is located approximately three miles to the southeast of the Fort Lawton site and maintains protected views toward the south and southeast of the Space Needle.

Development on the Fort Lawton site would not impact views of the Space Needle from Kerry Park or any other protected Space Needle viewpoint location; therefore, they were not included in the view analysis.

² Seattle Municipal Code Chap. 25.05.675 P.2.b.i.

³ Seattle Municipal Code Chap. 25.05.675 P. and Seattle DCLU, 2001,

⁴ City of Seattle, Viewpoints Locator Map.

Scenic Routes

City ordinances⁵ also identify specific scenic routes throughout the City from which view protection is encouraged: *It is City policy to protect public views of significant natural and human-made features from designated scenic routes, identified in Attachment 1”* (25.05.675 P.2.). Near the Fort Lawton site, there are two designated Scenic Routes, W Commodore Way and Seaview Avenue NW to the north of the site, that provide views of the Lake Washington Ship Canal. These locations are depicted on **Figure 3.7-1**.

Development on the Fort Lawton site would not affect views from these scenic routes due to the intervening distance, topography, vegetation and buildings (see the photos in **Appendix G**). Therefore, photo simulations of proposed development were not prepared from these viewpoints.

Existing Views from the Selected Viewpoints

Four viewpoints were ultimately selected as being most representative of area viewpoints and/or were determined to have the greatest potential for redevelopment on the Fort Lawton site to change the character of the view:

- **Viewpoint 2** – Fort Lawton Military Cemetery (Southwest of Site)
- **Viewpoint 3** – Discovery Park East Boundary (West of Site)
- **Viewpoint 6** – Secondary Entrance at Texas Way W (Northwest of Site)
- **Viewpoint 9** – 36th Avenue W (East of Site)

See **Figure 3.7-1** for the locations of these viewpoints. Existing views toward the Fort Lawton site from these viewpoints are described below.

Viewpoint 2 – Fort Lawton Military Cemetery at Discovery Park

From Viewpoint 2, the existing view includes grass and trees within the Fort Lawton Military Cemetery and the existing fence line separating the cemetery from the Fort Lawton site in the foreground view. Texas Way W is in the mid-ground view, as well as storage/maintenance buildings and paved areas in the south central portion of the site. Existing on-site trees and portions of other existing on-site buildings are also partially visible within the background view (see **Figure 3.7-2**).

Viewpoint 3 – Discovery Park East Boundary

From Viewpoint 3, the existing view is of the central portion of the Fort Lawton site, including Texas Way W, the driveway access to the FLARC VA building and one- and two-story storage and maintenance buildings on the site. Mature trees and vegetation are visible in the background view (see **Figure 3.7-3**).

⁵ Ord. #97025 (Scenic Routes Identified by the Seattle Engineering Department’s Traffic Division) and Ord. #114057 (Seattle Mayor’s Recommended Open Space Policies).

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Existing Conditions



Alt. 1



Alt. 2

Source: SMR Architects, 2017.

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Existing Conditions



Alt. 1



Alt. 2

Source: SMR Architects, 2017.

Figure 3.7-3

Viewpoint 3—Discovery Park East Boundary

Viewpoint 6 – Secondary Entrance at Texas Way

From Viewpoint 6, the existing view includes the secondary entrance at the northwest corner of the Fort Lawton site via Texas Way W. The view from this location includes the Texas Way W paved roadway, which is framed by existing mature trees and vegetation on both sides (see **Figure 3.7-4**).

Viewpoint 9 – 36th Avenue W

From Viewpoint 9, the existing view consists of the 36th Avenue W roadway and mature trees, landscaping and fencing along the east edge of the Fort Lawton site. A portion of two-story maintenance and storage buildings on the site are partially visible from this location beyond the existing mature trees (see **Figure 3.7-5**).

Light and Glare

The principal sources of existing light on and adjacent to the Fort Lawton site include street lights on area roadways (i.e., Texas Way W, 36th Avenue W, W Lawton Street, W Government Way, etc.); vehicle headlights on area roadways; and building lighting (including interior lighting and exterior lighting). Existing buildings on Fort Lawton site produce a minimal amount of light because the buildings are currently vacant. Existing light standards associated with the streetlight fixtures onsite are approximately 30 feet high and the lamps are cobra-style fixtures (cobra lamps function by lighting a broad area).

The primary sources of glare on and adjacent to the Fort Lawton site include light and reflective glare from glazing and other specular surfaces on vehicles traveling along area roadways, as well as light and reflective glare from glazing and other specular surfaces on existing buildings. Glare from existing buildings, paving and vehicles on and near the Fort Lawton site is expected to be minimal, given the types of buildings and amount of traffic that is present.

Shadows

Seattle's SEPA policies relating to shadows (SMC 25.05.675.Q.2.) aim to "minimize or prevent light blockage and the creation of shadows on open spaces most used by the public."⁶ The closest public parks to the Fort Lawton site are Discovery Park (located immediately west and south of the site), Kiwanis Memorial Preserve Park (located one block to the east) and Commodore Park (located less than 0.25 mile to the northeast). Factors that influence the extent of shading include: weather (e.g., cloud cover); building height, width and facade orientation; and the proximity of other intervening structures and/or trees, topographic variations and significant landscaping. Generally, greater building

⁶ Seattle Municipal Code Chapter 25.05.675 Q2.

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Existing Conditions



Alt. 1



Alt. 2

Source: SMR Architects, 2017.

Figure 3.7-4

Viewpoint 6—Secondary Entrance at Texas Way

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Existing Conditions



Alt. 1



Alt. 2

Source: SMR Architects, 2017.

heights extend the length of the shadow cast and increased mass (or cross-sectional width) widens the shadow cast by a building. Shadows from tall buildings extend farther from a building but their effects on more distant locations are of shorter duration, because the sun's motion translates into faster movement of the shadow over the ground. Buildings with greater mass create wider shadows and an increased amount of shaded area within the immediate area (e.g., adjacent streets, public spaces, etc.), but the reach of the shadow is limited by the building's height.

Shadows from existing development on the Fort Lawton site are limited due to the lower building heights on the site (primarily one- to two-story buildings). The mature trees and vegetation surrounding the site within Discovery Park and adjacent neighborhoods is the largest source of shadows on and near the site. Shadows from existing buildings onsite do not extend onto the park.

Talaris Site

Visual Character

The existing visual character of the Talaris site is defined by the historic conference center buildings located within a park-like setting. Existing buildings on the site are one- to two-stories in height and are generally wood-frame construction. The buildings are in the mid-century modern style. A man-made pond is located in the central portion of the site and a natural area with a wetland in the site's southwest corner. Mature trees are located throughout the site, including along all four edges of the property. Both the buildings and landscaping are designated historic landmarks by the City of Seattle (see Section 3.9, **Historic and Cultural Resources**, for details).

To the east, west and south of the site, the visual character is primarily defined by existing residences in the Laurelhurst neighborhood. Most of the buildings are single-family residences with some multi-family residences located to the south of the site. Single-family residences are generally one to two stories in height while multi-family residences are two to three stories.

The visual character of the area to the north is generally defined by multi-family residences, commercial/offices uses and institutional uses (Children's Hospital). Multi-family apartment complexes are located immediately north of the Talaris site and are typically three to four stories in height. Commercial/retail uses to the northeast are generally one to two stories in height. A four-story medical office building and an eight-story medical building (Children's Hospital) are located further to the north.

Views

City-Designated Public Viewpoints

There are no officially-designated public viewpoints in the immediate vicinity of the Talaris site. The closest designated public viewpoint is Washington Park (Foster Island/Arboretum) which is located approximately one mile to the south of the site, beyond Union Bay. This

viewpoint would not be impacted by development on the Talaris site due to the intervening distance, topography, vegetation and buildings, and therefore was not analyzed.

Views of City-Designated Historic Landmarks

The existing Talaris buildings and landscape were designated as a historic landmark by the City of Seattle in 2013 based on satisfying several criteria, including that the site embodies distinctive visual characteristics of an architectural style or period or a method of construction, is an outstanding work of a design or building and is an easily identifiable visual feature of its neighborhood or the City and contributes to the distinctive quality or identity of such neighborhood. Views of the Talaris site are available from several areas surrounding the sight, the most prominent of which are from the south (along NE 41st Street), the west (along the street ends of NE 42nd Street, NE 43rd Street and NE 44th Street), and the north (from existing multi-family residences immediately adjacent to the site) (see **Figure 3.7-6**, Talaris Existing Views).

The next closest city-designated landmark to the Talaris site is the University Presbyterian Church which is located approximately 1.1 miles to the northwest of the site. The closest state or national historic register properties are located on the University of Washington campus, approximately one mile to the west of the Talaris site. Views of these landmarks and historic register properties would not be impacted by development on the Talaris site due to the intervening distance, topography, vegetation and buildings, and therefore were not analyzed.

Space Needle Viewpoints

There are no protected Space Needle viewpoints in the immediate vicinity of the Talaris site. The closest protected Space Needle viewpoint is Gasworks Park which is located approximately 2.5 miles to the southwest of the site. Views from this viewpoint would not be impacted by development on the Talaris site due to the intervening distance, topography, vegetation and buildings, and therefore were not analyzed.

Scenic Routes

The closest scenic route to the Talaris site is NE 45th Street and Sand Point Way NE, which is located approximately two blocks to the north of the site. Within the area proximate to the Talaris site there are no views of significant natural features (i.e., the Cascade Mountains, Lake Washington, etc.) from this scenic route (views are blocked by development in the Laurelhurst neighborhood). Therefore, view impacts from these scenic routes were not analyzed.

Light and Glare

The principal sources of existing light that occur on or adjacent to the Talaris site include street lights on area roadways (i.e., Talaris Way, NE 41st Street, 42nd Avenue NE, NE 45th Street, etc.); vehicle headlights on area roadways; and building lighting (including interior lighting and exterior lighting). Existing light standards associated with the streetlight fixtures are approximately 30 feet and the lamps are cobra-style.

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**South Portion of
the Talaris Site**



**Central Portion of
the Talaris Site**



**North Portion of the
Talaris Site**

Source: EA Engineering, 2017.

The primary sources of glare on and adjacent to the Talaris site include light and reflective glare from glazing and other specular surfaces on vehicles traveling along area roadways, and light and reflective glare from glazing and other specular surfaces on existing buildings.

Shadows

As noted previously, Seattle’s SEPA policies aim to “minimize or prevent light blockage and the creation of shadows on open spaces most used by the public.” The closest public park to the Talaris site is Laurelhurst Park, which is located approximately 0.2 miles to the west of the site. Shadows from existing development on the Talaris site are limited due to the lower building heights on the site (primarily one- to two-story buildings) and the presence of mature trees and vegetation around the perimeter of the site and do not extend onto the park.

3.7.2 Impacts of the Alternatives

An analysis of the potential adverse aesthetics/light and glare impacts of Alternative 1, the Applicant’s Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant’s Preferred Alternative)

Fort Lawton Site

Visual Character

Under Alternative 1, development on the Fort Lawton site would change the visual character from the existing, collection of former military buildings to housing and open space/park facilities. Senior supportive housing would consist of one three-story (up to 40-feet tall), u-shaped building located in the west central portion of the site. Affordable rental housing would include four, three-story (up to 30-feet tall) rowhouse blocks in the central portion of the site. Affordable homeownership rowhouses would be located in the central portion of the site and include two, three-story (up to 30-feet tall) six-plex buildings. Affordable homeownership townhomes would be provided in 20, three-story (up to 30-feet tall) duplex buildings in the central and east portions of the site. The site layout under Alternative 1 would place the taller and denser buildings in the central and west portions of the site, away from the adjacent single-family areas offsite.

Exterior building materials could include fiber cement panel and lap siding, as well as wood framing and trim. Design details for the buildings would be taken from the Officer Row housing that had historically occupied the site and the design concept is intended to meet the overall City of Seattle design guidelines and design review requirements. **Figure 3.7-7,**

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Note: These are examples of existing affordable developments with housing types similar to those proposed at Fort Lawton.

Source: Tonkin Architecture, SMR, and Habitat for Humanity, 2017.

Affordable Housing Design Examples, shows existing affordable housing in the Seattle area that is representative of the housing types proposed at Fort Lawton.

Landscaping under Alternative 1 would be designed to meet applicable City of Seattle landscape regulations and is intended to blend with the existing natural vegetation in the adjacent Discovery Park and landscaping in the Magnolia neighborhood. The parks and recreation facilities under Alternative 1 would preserve existing wooded areas in the north, south and west portions of the site; retain passive use lawn areas; and develop two unlit, multi-purpose fields in the central part of the site. The project would maintain and as necessary enhance the existing trees and other vegetation along the east edge of the site that serve as a buffer between the site and the existing residences to the east.

Views

The following summarizes potential changes to view conditions that could occur with redevelopment on the Fort Lawton site under Alternative 1.

Viewpoint 2 – Fort Lawton Military Cemetery

Under Alternative 1, the existing foreground view would remain unchanged, but new development on the Fort Lawton site would be visible within the mid-ground and background views. Affordable apartments and affordable homeownership townhomes and rowhouses would be visible to the east of Texas Way W and would generally be up to 30 feet tall with a 10-foot pitched roof. To the south of these building would be surface parking areas and the two natural-turf multi-purpose fields. The senior supportive housing apartment building would be located to the west of Texas Way W, but would largely be obstructed from view in this location by existing mature trees (see **Figure 3.7-2**).

Viewpoint 3 – Discovery Park East Boundary

Redevelopment under Alternative 1 would replace the existing one- and two- story storage and maintenance buildings with new three- to four-story buildings (up to 40 feet in height), including senior supportive housing, affordable rental housing and affordable homeownership townhomes and rowhouses. New buildings would generally be located in similar areas as existing buildings on the site, but would be taller and denser. Surface parking would be located to the south of the new buildings and the existing grass open space area would be replaced with two multi-use fields (see **Figure 3.7-3**).

Viewpoint 6 – Secondary Entrance at Texas Way

Under Alternative 1, the view would remain generally like existing conditions. Redevelopment on the Fort Lawton site would be located to the south of the roadway (to the right of a potential viewer) and would generally be obstructed by existing mature trees and vegetation adjacent to Texas Way W. Portions of buildings may be visible through certain sections of the existing trees and other vegetation but the general view from this

location would not be substantially different with redevelopment under Alternative 1 (see **Figure 3.7-4**).

Viewpoint 9 – 36th Avenue West

Redevelopment on the Fort Lawton site under Alternative 1 would change the existing background view from this location to reflect new buildings on the Fort Lawton site. New affordable homeownership townhomes would be located on the eastern edge of the site and would be two to three stories tall (approximately 30 feet with a 10-foot pitched roof). These buildings would be similar in height and bulk to the existing residences located along 36th Avenue NE (to the east of the site) and would be partially visible from this location due to the existing mature trees that would continue to provide a visual buffer between the site and adjacent uses (see **Figure 3.7-5**).

Light and Glare

Redevelopment under Alternative 1 would add new sources of light on the Fort Lawton site, including interior and exterior building lighting associated with new residential buildings, pedestrian-scale lighting and an increase in mobile sources of light from vehicles traveling to and from the site. Alternative 1 would result in the greatest increase in light on the site of the EIS alternatives due to the number of residential units and the multiuse fields which could result in an increase in visitors traveling to and from the site for recreational uses. Areas immediately adjacent to the Fort Lawton site (i.e., existing residences to the east of the site) could experience some localized light spillage; however, the amount of light spillage is not anticipated to be significant and existing mature trees along the eastern edge of the site would continue to serve as a partial buffer to screen light spillage in certain locations. Lighting on the site would be designed to be consistent with City of Seattle Municipal Code (SMC), including SMC 23.45.534 (multi-family light and glare standards).

New sources of glare would also occur on the site with redevelopment. The primary sources of glare would be vehicles travelling to and from the site, as well as sunlight reflected off specular building surfaces on building façades. As noted above, it is anticipated that potential buildings would be designed to be consistent with City light and glare standards. As part of the City's design review process, potential factors that could influence glare would be reviewed such as façade design, materials and glazing to ensure that new development would not create a substantial source of glare. As a result, significant glare impacts are not anticipated.

Shadows

Under Alternative 1, the housing development would generate additional shadows. Shadow diagrams were completed under Alternative 1 at the Fort Lawton site (see **Appendix G** for these diagrams). Shadows associated with new buildings would generally be cast toward the northwest during the mornings (9:00 AM), transition toward the north in the mid-day (12:00 PM), and toward the northeast by the late afternoon/early evening (3:00 PM). The time of year with the longest shadows would be during the winter when the angle of the

sun is at its lowest period. Due the height of the potential buildings, most of the shadows from potential development would remain on the Fort Lawton site. During the morning and late afternoon in the winter it is possible that some shadows could extend beyond the site boundaries and onto adjacent portions of Discovery Park. However, existing mature trees would continue to provide the greatest source of shadows in the Fort Lawton vicinity. Therefore, shadows associated with development under Alternative 1 would not result in significant impacts.

Talaris Site

Under Alternative 1, no redevelopment would occur on the Talaris site. Aesthetic/light and glare conditions would remain as under existing conditions.

Alternative 2 – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Visual Character

Under Alternative 2, development on the Fort Lawton site would change the visual character from the existing, vacant military storage and maintenance buildings to new single-family residences. Approximately 113 new market-rate residential units would be provided on the site. No parks and recreation facilities would be included; however, approximately 65% of each building lot would be in private yards for use by individual homeowners in accordance with the site's SF 7,200 zoning (which allows up to 35% building coverage per lot). Consistent with the site's SF 7,200 zoning, buildings would generally be a maximum of 30 feet in height. The market-rate homes would likely be designed to appeal to higher income buyers.

Landscaping under Alternative 2 would be provided at the discretion of the homebuilders and individual homeowners and would be intended to meet the applicable City of Seattle landscape regulations.

Views

The following summarizes potential changes to view conditions that could occur with redevelopment on the Fort Lawton site under Alternative 2.

Viewpoint 2 – Fort Lawton Military Cemetery

From Viewpoint 2, the existing foreground view would remain unchanged under Alternative 2, but new development on the Fort Lawton site would be visible within the mid-ground and background views. New single-family residences would comprise a more substantial portion of the view from this location compared with Alternative 1, as no park areas (i.e., multi-use fields) would be provided between the south edge of development and Texas Way W (see **Figure 3.7-2**).

Viewpoint 3 – Discovery Park East Boundary

Like Alternative 1, redevelopment under Alternative 2 would change the view from Viewpoint 3 to reflect new residential buildings. New buildings would generally be located in similar areas as existing buildings on the site, but would be taller and denser. As under Alternative 1, new residential development would comprise most of the view from this location (see **Figure 3.7-3**).

Viewpoint 6 – Secondary Entrance at Texas Way in the North Portion of the Site

Under Alternative 2, the view of development on the Fort Lawton site from Viewpoint 6 would be generally similar to Alternative 1. However, a portion of redevelopment on the site would be located to the north and south of the roadway, but would generally be obstructed by existing mature trees and other vegetation adjacent to Texas Way W. Portions of buildings may be visible through certain sections of the existing trees and vegetation but it is anticipated that the general view from this location would not be significantly impacted by redevelopment under Alternative 2 (see **Figure 3.7-4**).

Viewpoint 9 – 36th Avenue W (East of the Site)

Like Alternative 1, redevelopment on the Fort Lawton site under Alternative 2 would change the existing background view to reflect new buildings on the Fort Lawton site. New single-family residences would be located on the eastern edge of the site and would be two to three stories tall. These buildings would be similar in height and bulk to the existing residences located along 36th Avenue NE (to the east of the site) and would be partially visible from this location due to the existing mature trees that would be retained that would continue to provide a visual buffer between the site and adjacent uses (**Figure 3.7-5**).

Light and Glare

Like Alternative 1, redevelopment under Alternative 2 would add new sources of light on the Fort Lawton site, including interior and exterior building lighting associated with new residential buildings, pedestrian-scale lighting and an increase in mobile sources of light from vehicles traveling to and from the site. Light levels would be lower than under Alternative 1 due to fewer residential units and no parks uses. Areas immediately adjacent to the site (i.e., existing residences to the east of the site) could experience some localized light spillage; however, the amount of light spillage is not anticipated to be significant. Lighting on the site would be designed to be consistent with City of Seattle light and glare requirements.

New sources of glare would also be introduced on the site, including from vehicles travelling to and from the site, as well as sunlight reflected off of specular building surfaces on building façades. Potential glare levels would be lower under Alternative 2 due to fewer residential units on the site than under Alternative 1. As noted above, buildings would be designed to be consistent with City light and glare standards. As a result, significant glare impacts are not anticipated.

Shadows

The proposed single-family housing would generate additional shadows on the Fort Lawton site. Shadow diagrams were completed for Alternative 2 at the site (see **Appendix G**). Like Alternative 1, most of the shadows from the development would remain on the Fort Lawton site. During the morning and late afternoon in the winter time it is possible that some shadows could extend beyond the site boundaries and onto adjacent portions of Discovery Park. However, since the existing mature trees would continue to be the greatest source of shadows in the Fort Lawton vicinity, shadows associated with development under Alternative 2 are not expected to result in significant impacts.

Talaris Site

Visual Character

Development on the Talaris site under Alternative 2 would change the visual character of the Talaris site from a conference center in a park-like setting to housing and open space areas. Under Alternative 2, some housing would occupy existing, renovated buildings while other new housing would be in newly constructed buildings, primarily within the west and south portions of the site. New senior supportive housing would consist of one three-story (up to 40-feet tall) building located in the west central portion of the site. Affordable rental housing would include four new three-story (up to 30-feet tall) rowhouse blocks in the northwest portion of the site. Affordable homeownership rowhouses would be located in the west and south portions of the site and include seven new three-story (up to 30-feet tall) six-plex buildings. An affordable homeownership townhome would be provided in one three-story (up to 30-feet tall) duplex building in the south portion of the site. The site layout under Alternative 2 is designed to place the tallest and most dense building internal to the site and away from adjacent single-family areas offsite.

Exterior building materials would be similar to under Alternative 1. The design concept under Alternative 2 is intended to meet the overall City of Seattle design guidelines and design review requirements, and would also adhere to the requirement of the Talaris site's historic landmark designation.

Landscaping under Alternative 2 would be designed to meet the applicable City of Seattle landscape regulations. A majority of the existing landscaping would be retained with the development of the affordable housing onsite. Any modifications to the existing landscaping would adhere to the requirements of the site's historic landmark designation.

Views

As noted previously, there are no City-designated public viewpoints, protected Space Needle viewpoints or scenic routes in the immediate vicinity of the Talaris site that would be impacted by redevelopment under Alternative 2. However, the Talaris buildings and landscape have been designated as a City historic landmark and potential modifications to the existing buildings and landscaping, as well as the addition of new buildings would change the views and aesthetic character of a designated landmark. Consistent with City of

Seattle requirements, any potential modifications to designated landmark features on the Talaris site under Alternative 2 would need to obtain a Certificate of Approval from the City of Seattle Department of Neighborhoods to ensure that modifications do not significantly compromise the site's landmark status. The Certificate of Approval would require the review and approval by the City of Seattle's Landmark Preservation Board.

Light and Glare

Like Alternative 1, redevelopment under Alternative 2 would add new sources of light on the Talaris site, including interior and exterior building lighting associated with new residential buildings, pedestrian-scale lighting and an increase in mobile sources of light from vehicles traveling to and from the site. Areas immediately adjacent to the Talaris site (i.e. existing residences surrounding the site) could experience some localized light spillage; however, the amount of light spillage is not anticipated to be significant and existing mature trees and other vegetation along the perimeter of the site would continue to serve as a partial buffer to screen light spillage in certain locations. Lighting on the site would be designed consistent with City of Seattle light and glare requirements.

New sources of glare would also be introduced on the site with redevelopment. The primary sources of glare would be vehicles travelling to and from the site, as well as sunlight reflected off specular building surfaces on building façades. As noted above, buildings would be designed to be consistent with City light and glare standards. As a result, significant light and glare impacts are not anticipated.

Shadows

Under Alternative 2, the new affordable housing would generate additional shadows on the Talaris site. Like development on the Fort Lawton site under Alternative 1, it is anticipated that most of the shadows from potential development would remain on the Talaris site. During the morning and late afternoon in the winter time, it is possible that some shadows could extend beyond the site boundaries and onto adjacent properties; however, the shadows would not extend over any existing public parks. In addition, since existing mature trees would continue to provide the greatest source of shadows in the Talaris vicinity, shadows associated with development under Alternative 2 are not expected to result in significant impacts.

Alternative 3 - Public Park Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Visual Character

Development on the Fort Lawton site under Alternative 3 would change the visual character of the site from a collection of former military buildings and surface parking areas into new park/recreational areas. Passive recreation areas would be located in the north portion of the site. Multi-use fields would be provided in the south portion of the site.

Like under Alternative 1, landscaping under Alternative 3 would be designed to meet applicable City of Seattle landscape regulations and is intended to blend with the existing natural vegetation in the adjacent Discovery Park and landscaping in the adjacent Magnolia neighborhood. The parks and recreation facilities under Alternative 3 would preserve existing wooded areas in the north, south and west portions of the site; retain passive use lawn areas; and develop three, unlit multi-purpose fields in the central part of the site. The project would maintain and as necessary enhance the existing trees and other vegetation along the eastern edge of the site that serve as a buffer between the site and the existing residences to the east.

Views

Under Alternative 3, views of the Fort Lawton site would change to reflect the passive and active recreation areas. No impacts to City-designated public viewpoints, protected Space Needle viewpoints, scenic routes or other public views are anticipated since no building development would occur on the site.

Light and Glare

Although no new sources of building or field lighting would occur on the Fort Lawton site under Alternative 3, the passive and active recreation areas would result in an increase in mobile sources of light and glare from additional vehicles traveling to and from the site. Due to the level of development assumed under Alternative 3 the amount of light and glare would be much lower than under Alternatives 1 and 2.

Shadows

Under Alternative 3, no new building development would occur on the Fort Lawton site and no new shadows would be generated.

Talaris Site

Redevelopment of the Talaris site under Alternative 3 would be the same as described under Alternative 2 and potential aesthetic, view, light and glare and shadow impacts would be the same as well.

Alternative 4 – No Action Alternative

Under Alternative 4, no new development would occur on the Fort Lawton or Talaris sites at this time. The sites would remain in their existing conditions and no changes to aesthetic, view, light and glare or shadow conditions are anticipated.

3.7.3 Mitigation Measures

The following measures have been identified to address the potential aesthetic impacts from construction and operation of the Fort Lawton Project under Alternatives 1, 2 and 3. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal

regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

Legally-Required Measures

- Proposed development would adhere to all applicable City of Seattle Land Use Code requirements related to aesthetics/light and glare and would be subject to the City's design review processes.
- Under Alternatives 2 and 3, proposed development on the Talaris site would require a Certificate of Approval from the City of Seattle Department of Neighborhoods to ensure that modifications do not significantly compromise the site's landmark status, including visual character and views. The Certificate of Approval would require the review and approval by the City of Seattle's Landmark Preservation Board.
- Landscaping would be provided per the City of Seattle landscape standards.
- Pedestrian-scale lighting would be provided consistent with code, function, and safety requirements. Exterior lighting would include fixtures to direct the light downward or upward and away from off-site land uses.

3.7.4 Significant Unavoidable Adverse Impacts

Proposed development under the EIS Alternatives would change the visual character of the Fort Lawton or Talaris sites to new townhouses, rowhouses, and apartment buildings and open space/park facilities. No significant unavoidable adverse aesthetic/light and glare impacts are anticipated.

3.8 RECREATION AND OPEN SPACE

This section of the DEIS describes recreation and open space uses on and near the Fort Lawton and Talaris sites. Potential impacts from redevelopment of the EIS alternatives on these uses are evaluated and mitigation measures identified.

Key Findings

The Fort Lawton site currently contains no formal recreation uses. Discovery Park is located immediately adjacent to the site. The Talaris site also contains no formal recreation uses, but is used informally by the community for walking. The closest public park is Laurelhurst Playfield and Community Center, approximately 0.25 miles to the east.

Under Alternatives 1 and 2, new residential development on the Fort Lawton site would generate demand for parks and recreation facilities. Under Alternative 1, the demand for approximately 4.7 acres of parks/recreation area could be satisfied by the dedication of approximately 4.7 acres of land owned by the U.S. Army to Discovery Park, as well as the provision of approximately 8.2 acres of passive recreation areas and approximately 5.4 acres of active recreation areas (including two multi-purpose fields). Under Alternative 2, the demand for approximately 2.1 acres of parks/recreation areas could be fulfilled by use of the 4.7 acres of land on the west edge of the site as private open space or purchase of this land by the City for public use. However, if this area is retained by the U.S. Army, it could result in some demand by on-site residents at nearby parks. Under Alternative 3, the entire Fort Lawton site would be developed as a public park, including 17.0 acres of passive recreation uses and 7.6 acres of active recreation uses (including three multi-purpose fields). Approximately 4.7 acres of land owned by the U.S. Army could also be dedicated to Discovery Park under this alternative.

Under Alternatives 2 and 3, new residential development on the Talaris site would generate additional demand for approximately 4.7 acres of parks/recreation areas. While retained on-site walkways and open space areas could fulfill a portion of the demand for parks/recreation areas, the demand could result in increased use of nearby parks.

Overall, residential development under Alternatives 1, 2 and 3 is not expected to result in significant impacts on recreation and open space given the proposed open space and recreation areas. And, substantial parks and recreation facilities would be provided at the Fort Lawton site under Alternatives 1 and 3.

Methodology

Information on existing recreation facilities and parks/open space is from the Seattle Parks and Recreation (SPR) website. The analysis of demand for parks is based on level of service standards from City of Seattle's 2017 Parks and Open Space Plan.

3.8.1 Affected Environment

This sub-section describes the existing recreation facilities and parks/open space on and near the Fort Lawton and Talaris sites.

Fort Lawton Site

Site

In 1897, the Seattle Chamber of Commerce and local citizens donated 703 acres of Magnolia Bluff to the U.S. Army for use as a base to defend Seattle and Puget Sound. Fort Lawton was in active military use through World Wars I and II, the Korean War and into the Vietnam War. In 1968, the Army transferred much of the base site to the City of Seattle, which subsequently became Discovery Park. After the land was transferred to the City, a 20-acre portion of the site was turned over to Native Americans to create the Daybreak Star Cultural Center. An area of approximately 46 acres was retained by the U.S. Army and used as a Reserve Center. Approximately 34 acres of the Army Reserve Center, and the subject of this EIS, is currently closed, vacant and in caretaker status by the U.S. Army. The Fort Lawton site is currently comprised of buildings, surface parking and vegetated areas. Approximately 9.6 acres of the site is in passive open space that includes natural wooded and vegetated areas. An additional approximately 5.9 acres is comprised of landscaped areas. There are no formal recreation uses on the Fort Lawton site.

Fort Lawton Vicinity

Discovery Park is located immediately west of the Fort Lawton site and is the largest park in the city of Seattle. The approximately 534-acre area park is located on Magnolia Bluff and offers views of Puget Sound, the Olympic Mountains and Cascade Mountains. The park includes two-miles of protected tidal beaches as well as open meadow lands, sea cliffs, forest groves, active sand dunes, thickets and streams. Boating access is available along 100-feet of shoreline north and 100 feet of shoreline south of the West Point lighthouse. Recreational facilities within the park include a 2.8-mile loop trail around the park, open space, beach areas, picnic areas, basketball courts, children's play areas, tennis courts and volleyball courts. The Daybreak Star Native American Cultural Center is in the north portion of the park and is operated by the United Indians of All Tribes Foundation for their programs and events, as well as for rental and use by the public. The Discovery Park Environmental Learning Center is also located within the park and includes classrooms for environmental programs and events.

Other parks in the Fort Lawton vicinity include the Kiwanis Memorial Preserve Park (located approximately one block to the east of the site) and Commodore Park (located less than 0.25 mile to the northeast of the site). The Kiwanis Memorial Preserve Park is generally comprised of natural open space areas and hiking trails. Commodore Park includes seating areas, picnic areas, walkways and open space adjacent to the Lake Washington Ship Canal.

Talaris Site

Site

The Talaris site is comprised of buildings and parking areas that are part of a conference center. The center is located within a park-like setting with ornamental landscaping and a man-made pond. Existing trees and other vegetation are located along the perimeter of the site and a natural area is located in the southern portion of the site. While there are no formal public park uses on the Talaris site, many local community members have historically used portions of it for strolling and dog walking. However, there are signs surrounding the site noting that it is private property and that public access and use of the property is prohibited.

Talaris Vicinity

The closest public park to the Talaris site is Laurelhurst Playfield which is located less than 0.25 mile east of the site and includes ballfields, tennis courts, a children's play area and open space. The Laurelhurst Community Center is located adjacent to the playfield and provides several youth and recreation programs, including toddler/preschool age programs, after school programs and youth sports.

Other recreation and open space areas near the site include Belvoir Place (located 0.25 mile to the south), the Union Bay Natural Area (located 0.25 mile to the southwest) and Burke Gilman Playground Park (located 0.3 mile to the north). Belvoir Place is a small waterfront park that includes a dock and provides access for hand-carry boats. The Union Bay Natural Area is a 74-acre public wildlife and natural restoration area on the University of Washington campus; it includes walking trails and viewing areas. Burke Gilman Playground Park includes jogging trails that connect with the Burke Gilman Trail, a children's playground, seating areas, picnic tables and open space.

Existing Citywide Demand for Park and Recreational Facilities

The growing population in Seattle has placed demands on the public park system and has impacted the limited active recreation resources available through Seattle Parks and Recreation (SPR). Between 2010 and 2016, Seattle's population increased by 78,140 individuals. Puget Sound Regional Council has projected that an additional 120,000 people will move to Seattle by 2035, with most growth occurring in the city's urban centers and villages. To meet the increased demand for park space and meet the City's adopted Level of Service (LOS) of eight acres of parkland per 1,000 residents, SPR needs to acquire approximately 40 acres of parkland by 2035.

3.8.2 Impacts of the Alternatives

An analysis of the potential adverse recreation and open space impacts of Alternative 1, the Applicant's Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred

Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant’s Preferred Alternative)

Fort Lawton Site

Redevelopment on the Fort Lawton site under Alternative 1 would include 238 new senior supportive and affordable housing units that would accommodate approximately 586 residents.¹ Under Alternative 1, approximately 21.6 acres of park and recreation facilities would be provided on the site. The 21.6 acres includes 3.3 acres for an SPR maintenance facility and 18.3 acres of passive and active recreation and open space areas for use by the on-site residents, as well as the surrounding community. The SPR maintenance facility would use one of the existing buildings onsite. Sidewalks and trails would be provided throughout the site. The parks and recreation facilities would be designed in more detail in the future through a planning and public outreach process, and would be constructed when funding is available.

Approximately 13.0 acres of the site would be provided for passive recreation activities such as picnicking and viewing. Existing wooded areas in the north and south parts of the site would be preserved in their natural condition. A large passive park would be provided in the north part of the site and a small passive park would be created in the central site area, amongst the townhouses and row houses. The smaller park could include a children’s play area(s). Up to 4.7 acres (of the 13 acres in passive recreation areas) of forest land owned by the U.S. Army in the west portion of the site could be dedicated to Discovery Park. These park areas would be designed and constructed to SPR standards, and would be owned and maintained by SPR.

In addition, approximately 5.1 acres of the site would be developed for active recreation, including two unlit, multi-purpose fields in the central portion of the site, to the south of the housing and parking. Counting associated parking and site improvements, the total area devoted to active recreation is approximately 6 acres. These fields could be configured in a variety of orientations for different uses, including for both structured and unstructured athletics and community functions. It is anticipated that some league play would occur on these fields. The fields would include an irrigation system which would require electricity to run. It should be noted that the City has begun discussion with Seattle Public Schools (SPS) regarding their interest in owning and maintaining land dedicated to active recreation. Such uses could help meet SPS’s recreational needs, as well as serving the broader public. As with other shared facilities in Seattle, these would likely be the subject of a Joint Use of Facilities Agreement with SPR.

¹ Population estimates are based on comparable projects and are calculated as follows Senior Supportive housing – 86 residents (1.0 resident per unit); Affordable rental – 250 residents (2.5 residents per unit); and, Affordable ownership - 250 residents (5.0 residents per unit).

As mentioned above, the City's adopted LOS for parkland from the 2017 Parks and Open Space Plan is 8 acres per 1,000 residents. While this LOS is used as a citywide guideline for the entire City of Seattle, it can also be used to provide an estimate of the demand for parks and recreation facilities that could be generated by new residents on the Fort Lawton site. Based on the number of residents (586 people) that would reside on the site with development under Alternative 1 and the citywide LOS guidelines, there would be demand for approximately 4.7 acres of parks and recreation facilities. This demand could result in increased use of nearby parks (e.g., Discovery Park, Commodore Park, Kiwanis Memorial Preserve Park, etc.). However, new demand could also be satisfied by the dedication of approximately 4.7 acres of land owned by the U.S. Army to Discovery Park, as well as the provision of approximately 8.2 acres of passive recreation areas and approximately 5.4 acres of active recreation areas onsite. The provision of new passive and active recreation facilities on the site would increase the amount of area and number of facilities that are available to the public. This increase in recreation area would also provide an additional amenity for nearby residents and the city of Seattle as a whole. As a result, no significant recreation and open space impacts are anticipated.

Talaris Site

Under Alternative 1, the Talaris site would remain in its existing condition and no new development would occur on the site at this time. Recreation and open space conditions would remain as under existing conditions.

Alternative 2 – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Under Alternative 2, market-rate housing would be developed on the Fort Lawton site, including 113 new single-family homes. Development under Alternative 2 would accommodate approximately 263 residents on the site.²

No new park or recreation facilities would be developed on the site under Alternative 2. Approximately 18.6 acres of the site would be in open space that would include areas for private yards on individual building lots. Up to 4.7 acres of forested land in the western portion of the site could be retained by the U.S. Army and used as open space for the Fort Lawton Army Reserve Center Veteran's Administration offices; purchased by the developer of the site and used as private open space for resident; or purchased by the City for future public use.

Based on the SPR 2017 Parks and Open Space Plan citywide LOS guidelines and the number of residents (263 people) that would reside on the site with development under Alternative 2, new residents would generate a demand for approximately 2.1 acres of parks and

² Based on 2.33 residents per unit in the Magnolia neighborhood from the American Community Survey 2009-2013, census tract aggregation.

recreation facilities. This demand could be fulfilled by use of the 4.7 acres of land on the western edge of the as private open space or purchase of this land by the City for public use. However, if this area is used by the U.S. Army, it could result in some level of increased recreation demand by on-site residents at nearby parks such as Discovery Park, Commodore Park and Kiwanis Memorial Preserve Park.

Talaris Site

Like development on the Fort Lawton site under Alternative 1, development on the Talaris site under Alternative 2 would include 238 new senior supportive housing and affordable housing units which would accommodate approximately 586 new residents on the site.

No park or recreation facilities would be developed on the Talaris side under Alternative 2. However, based on the site plan (see **Figure 2-11**), some of the open space areas (i.e., the existing pond and forested areas) and walkways would be retained onsite.

Based on the 2017 Parks and Open Space Plan citywide LOS guideline and the number of residents that would reside on the site with development under Alternative 2 (586 people), there would be demand for approximately 4.7 acres of parks and recreation facilities. While onsite walkways and open space areas could fulfill a portion of the demand generated under Alternative 2, the demand for parks and recreation facilities could result in increased use of nearby parks (e.g., Laurelhurst Playground, Belvoir Place, Burke Gilman Playground Park, the Union Bay Natural Area, etc.).

Alternative 3 - Public Park Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Under Alternative 3, the entire Fort Lawton site would be developed as a public park. Approximately 29 acres of open space area would be provided onsite, including the reuse of one of the existing buildings as an SPR maintenance building. Sidewalks and trails would be provided throughout the site. The parks and recreation facilities would be designed in more detail in the future through a planning and public outreach process, and would be constructed when funding is available. No housing would be developed on the site under Alternative 3.

A total of 17.0 acres on the Fort Lawton site would be provided for passive recreation uses. Existing forested areas in the north and south portions of the site would be preserved in their natural condition. Passive park areas would also be provided in the north part of the site. Like Alternative 1, up to 4.7-acres of forest land owned by the U.S. Army in the west site area could be dedicated to Discovery Park. All passive park areas would be designed and constructed to SPR standards and would be owned and operated by SPR.

A total of 7.6 acres on the site would be developed for active recreation, including three unlit, multi-purpose fields (versus two multi-purpose fields under Alternative 1). It is anticipated that some league play from SPR programming uses would occur on the site. The fields would include irrigation systems which would require electricity to run. All fields

would be designed and constructed per SPR standards and would be owned and operated by SPR.

While there would be no increase in demand for park and recreation facilities by residents on the Fort Lawton site under Alternative 3, the provision of passive and active recreation facilities on the site owned and operated by SPR would increase the amount of area and number of facilities that would be in the SPR inventory. This increase in recreation area (17 acres of passive and 7.6 of active recreation areas) would provide an additional amenity for nearby residents and the City of Seattle as a whole and would help satisfy the approximately 40 acres of parkland needed in the City by 2035.

Talaris Site

Development under Alternative 3 on the Talaris site would be the same as described under Alternative 2. As result, potential recreation and open space impacts would be the same as under Alternative 2.

Alternative 4 – No Action Alternative

Under the No Action Alternative, no new development would occur on the Fort Lawton site or the Talaris at this time. The sites would remain as under existing conditions and no impacts to recreation and open space would be anticipated. No new parks and recreational facilities would be developed on the Fort Lawton site, and the potential to satisfy some of the parkland needed in the City by 2035 would not be realized.

3.8.3 Mitigation Measures

The following measures have been identified to address the potential recreation and open space impacts from construction and operation of the Fort Lawton Project under Alternatives 1, 2 and 3. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

Legally-Required Measures

- A portion of the tax revenues generated directly and indirectly from development under the EIS alternatives—potentially including construction sales tax, retail sales tax, property tax, utilities tax, leasehold excise tax, and other fees from City licenses and permits during site redevelopment—would accrue to the City of Seattle and could help offset demands for public services, including parks and recreation.

Measures Proposed as Part of Project

- Up to 4.7 acres of forest land on the western edge of the Fort Lawton project site could be dedicated to Discovery Park under Alternatives 1 and 3. This area could potentially be purchased by the City of Seattle under Alternative 2 or used as private open space.
- Under Alternatives 1 and 3, passive and active recreation areas would be provided on the Fort Lawton site, including 2 or 3 multiuse fields, respectively.

3.8.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts to recreation and open space are anticipated.

3.9 HISTORIC AND CULTURAL RESOURCES

This section of the DEIS describes historic and cultural resources on and near the Fort Lawton and Talaris sites. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified. This section is based on the historic and cultural resources report prepared by Cultural Resource Consultants in October 2017 (see **Appendix H**).

Key Findings

Neither the Fort Lawton nor the Talaris site is on the National Register of Historic Places. The City Landmark status of the buildings on the Fort Lawton site has not been determined, but most do not appear to meet the criteria to be considered eligible for Landmark designation. The entire Talaris site is a designated City Landmark. The Fort Lawton site is considered to have a low potential to contain as-yet unknown archaeological sites; the Talaris site is considered to have a moderate potential to contain as-yet unknown archaeological sites.

Under Alternatives 1 and 3, all the existing buildings except Building 245 would be removed on the Fort Lawton site. Under Alternative 2, all the existing buildings would be removed on the Fort Lawton site. Existing buildings to be removed at the Fort Lawton site would be referred to the City Landmark Preservation Board for consideration. If a building is determined eligible for City Landmark status, requirements for mitigation of impacts to historic sites would be determined by the Landmarks Preservation Board. Under Alternatives 2 and 3, all the existing buildings would be retained and repurposed on the Talaris site. Development on the site could impact the site's landmarks status, and proposed development would require a Certificate of Approval from the Landmark Preservation Board to ensure that modifications do not significantly compromise the site's landmark status, including visual character and views. The probability of impacts to archaeological resources with development on either site is considered low, but somewhat greater with development under Alternatives 2 and 3 on the Talaris site. An archaeological survey would be conducted at the Talaris site prior to construction, and work stopped in the case of inadvertent discovery. Overall, significant impacts on historic and cultural resources are not expected with development at either site with adherence to applicable regulations.

Methodology

The assessment methods for the historic and cultural resources analysis included a review of previous ethnographic, historical and archaeological investigations onsite and in the local area; a records search at the Washington State Department of Archaeology and Historic Preservation (DAHP) for known sites in the immediate area; a review of relevant background literature and maps; and a pedestrian survey and subsurface testing. The cultural resources department at the Duwamish, Muckleshoot, Snoqualmie and Suquamish tribes were also contacted to inquire about project-related cultural information or concerns

on a technical staff-to-technical staff basis (see **Appendix H** for details on the historic and cultural resources analysis methodology).

3.9.1 Affected Environment

This sub-section describes the regulatory context that applies to historic and cultural resources and existing historic and cultural resources on and near the Fort Lawton and Talaris sites.

Historic Resources Regulatory Context

Designated historic landmarks are those properties that have been recognized locally, regionally or nationally as significant resources to the community, city, state or nation. Recognition may be provided by: listing in the National Register of Historic Places (NRHP) or the Washington Heritage Register (WHR); through a nomination process managed by DAHP; or by listing as a local landmark. Typically, a property is not eligible for consideration for listing in the NRHP or WHR until it is at least 50 years old. For King County Landmarks, the age threshold is 40 years and for city of Seattle Landmarks it is 25 years.

National Register of Historic Places

The National Park Service administers the NRHP. The NRHP is the official federal list of districts, sites, buildings, structures and objects significant in American history, architecture, archaeology, engineering and culture. NRHP properties have significance to the history of their community, state or the nation. Nominations for listing historic properties come from State Historic Preservation Officers, from Federal Preservation Officers for properties owned or controlled by the United States Government and from Tribal Historic Preservation Officers for properties on tribal lands. Private individuals and organizations, local governments and American Indian tribes often initiate this process and prepare the necessary documentation. In Washington State, the Washington State Advisory Council on Historic Preservation, organized and staffed by DAHP, considers each property proposed for listing and makes a recommendation on its eligibility.

To be eligible for listing, a property must normally be at least 50 years of age and possess significance in American history and culture, architecture or archaeology to meet one or more of four established criteria. A property must also have integrity, which is defined as "the ability of a property to convey its significance." ¹

¹ National Park Service. *How to Apply the National Register Criteria for Evaluation*. National Register bulletin, 15. U.S. Department of the Interior, National Park Service, Interagency Resources Division, 1997.

Washington Heritage Register

The Washington Heritage Register is an official listing of historically-significant sites and properties found throughout the state. The list is maintained by DAHP and includes districts, sites, buildings, structures and objects that have been identified and documented as being significant in local or state history, architecture, archaeology, engineering or culture. Sites which are listed in the NRHP are automatically added to the Washington Heritage Register.

King County Landmarks Process

The King County Historic Preservation Program administers the King County Landmarks process. Anyone may nominate a building, site, object, structure or district in King County for consideration as a King County Landmark. The King County Historic Preservation Officer reviews the nomination for completeness and schedules a public hearing before the King County Landmarks Commission for consideration. King County Code 20.62 requires that to be designated, a property must be more than 40 years old; possess integrity of location, design, setting, materials, workmanship, feeling and association; and meet at least one of five criteria.

City of Seattle Landmarks Process

Local recognition of historical significance in Seattle is provided through the process of designation of the property as a Seattle Landmark. The process consists of three sequential steps involving the Landmarks Preservation Board: submission of a nomination and its review and approval by the Board; designation by the Board; and negotiation of controls and incentives by the property owner and the Board staff. A final step in Seattle's landmarks process is approval of the designation by an ordinance passed by City Council.

The city of Seattle's Landmarks Preservation Ordinance (SMC 25.12) requires that to be designated, a building, object or site must be at least 25 years old and must meet at least one of the six criteria for designation outlined in the Seattle Landmarks Preservation Ordinance (SMC 25.12.350).

To make changes to the exteriors and in some case the interiors of designated Landmark buildings in the city of Seattle, a Certificate of Approval from the Landmarks Preservation Board must be obtained. This entails completing an application detailing proposed changes and a presentation before the Board for a members' vote. Based on the vote results, an application is approved, approved with conditions, or denied. A Certificate of Approval or a Letter of Denial is then issued.

Cultural Resources Regulatory Context

As described in **Chapter 2**, the proposed Fort Lawton Project is subject to SEPA, and could be subject to NEPA review; therefore, the applicability of both federal and Washington State regulations is considered in the cultural resources analysis for the project.

Section 106 of the National Historic Preservation Act (NHPA) requires that a federal agency consider the effects of undertakings upon historic properties within the project's Area of Potential Effects (APE). The APEs for the Fort Lawton project are defined as the areas within the Fort Lawton and Talaris site boundaries. The Fort Lawton site (and APE) is located in the Magnolia neighborhood in northwest Seattle; the Talaris site (and APE) is located in the Laurelhurst neighborhood in northeast Seattle.

Several Washington State laws specifically address archaeological sites and Native American burials and would pertain to redevelopment of the Fort Lawton and Talaris sites, including the Archaeological Sites and Resources Act [RCW 27.53] and the Indian Graves and Records Act [RCW 27.44].

(See **Appendix H** for details on historic and cultural regulatory context.)

Fort Lawton Site

Historic Resources

Site Historical Context

In 1897, the Seattle Chamber of Commerce and local citizens donated 703 acres of Magnolia Bluff to the U.S. Army for use as a base to defend Seattle and Puget Sound. Fort Lawton was in active military use as a staging center and prisoner of war camp through World Wars I and II, the Korean War and into the Vietnam War. At the height of base activities during World War II, the Fort included 450 buildings and housed 20,000 soldiers. In 1968, the Army decided to transfer much of the base site to the City of Seattle, which subsequently became Discovery Park, the City's largest park (534 acres). After the land was transferred to the City, a 20-acre portion of the site was turned over to Native Americans to create the Daybreak Star Cultural Center. An area of approximately 46 acres was retained by the U.S. Army and used as a Reserve Center. In 2000, the Army built the Fort Lawton Army Reserve Complex (FLARC) building at the Reserve Center, which was transferred to the Veterans Administration (VA) in 2011. The Federal Government plans to retain the portion of the Army Reserve Center site that contains FLARC, together with supporting parking and the military cemetery. The remaining approximately 34 acres of the Army Reserve Center (the subject of this EIS) is currently closed and vacant and is in caretaker status by the Army (see **Appendix H** for details about the history of the Fort Lawton site).

Site Buildings

There are currently six main buildings on the Fort Lawton site. Other buildings and structures are also present. **Table 3.9-1** lists the existing buildings and other buildings/structures and the dates they were built, and **Figure 3.9-1** depicts the locations of the buildings/structures. The 2012 U.S. Army NEPA Environmental Assessment (EA) determined that the Fort Lawton site was not eligible for listing in the NRHP. The EA did not evaluate buildings relative to Seattle Landmark criteria. Several of the buildings are at least 25 years old. However, the overall site is considered to have poor integrity and individually, most of the buildings on the site do not appear to meet the criteria to be considered eligible for Seattle Landmark designation due to a lack of significant associations, design characteristics or prominence, or do not meet the age threshold of 25 years. The exception is Harvey Hall, which could meet several of the Seattle Landmark criteria. Harvey Hall is an example of a Cold War military facility that was intended to be part of the local community and has retained a high level of integrity.

Table 3.9-1
FORT LAWTON SITE – EXISTING BUILDINGS & STRUCTURES

Building Name	Building Number	Build Date
Major Buildings		
Harvey Hall	Building 216	1958, 2003
Leisy Hall	Building 220	1972, 1976
Area Maintenance Support Activity (AMSA)	Building 222	1972
Maintenance	Building 211	1958
Maintenance	Building 214	2000
Organizational Maintenance Shop (OMS)	Building 245	1999
Other Buildings and Structures		
Fuel Shed	Building 223	1972
Storage Shed	Building 228	1990
Incinerator Stack	Incinerator Stack	1934
Pumphouse	Pumphouse	2001

Source: CRC, 2017.

Fort Lawton Vicinity

Review of DAHP's Historic Property Inventory shows that 75 historic resources have been identified within approximately 500 feet of the Fort Lawton site. These resources are primarily early to middle twentieth century single-family residences. Six historic resources within 500 feet of the site have been recorded in more detail, including the on-site buildings (see Table 2 in **Appendix H** for a list of these buildings). Each of these resources has been determined not eligible for the NRHP. They have not been evaluated for eligibility for nomination as Seattle Landmarks.

Fort Lawton Army Reserve Center Redevelopment Project
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Note: This figure is not to scale



Source: Cultural Resources Consultants, 2017.

Figure 3.9-1
Fort Lawton—Existing Buildings

The Fort Lawton Cemetery located immediately west of the site was established in 1898. The cemetery has been determined eligible for listing in the NRHP based on its associations with the development of Fort Lawton and its uniqueness as the only “post” cemetery in King County. Additionally, one mid-twentieth century residence has been recorded east of the site on 36th Avenue W but has not been evaluated for potential historical significance.

There are several properties within one mile of the site that have been listed on the NRHP, Washington Heritage Register (WHR), Seattle Landmarks Register (SLR) or as a National Historic Landmark. The Fort Lawton Historic District is located 0.25 mile west of the site. However, due to the distance from the site there is little potential for impacts from the project.

Cultural Resources

Archaeological Context

Thousands of years of human occupation of Puget Sound have been documented in a number of archaeological and ethnographic investigations over the past decade that provide a regional context for evaluation the Fort Lawton redevelopment. Archeological evidence suggests the presence of nomadic hunter-gatherers during the late Pleistocene to early Holocene. Human land use was generally structured around natural resources, such as fresh water, terrestrial and marine food resources, forests, and suitable terrain.

Ethnographic Context

The Fort Lawton site is located within the traditional territory of the Duwamish, a southern South Coast Salish people whose settlements were often located near major waterways within Puget Sound. Members of Suquamish and Muckleshoot tribes also used the vicinity. Ethnohistoric economies were dependent on seasonally available resources, which translated to seasonal occupation and logistic mobility. Near Fort Lawton, Salmon Bay was a thoroughfare for Puget Sound peoples headed to Lake Washington via canoe, as well as a resource for fishing and trading with neighboring tribes.

Previously Recorded Sites and Surveys

Seven archaeological sites have been recorded within one mile of the Fort Lawton site (see Table 1 in **Appendix H** for a list of these sites). One precontact archaeological site has been recorded 0.28 mile from the Fort Lawton site. When discovered in 1950, several stone tools were found at this site; when revisited in 1958, no artifacts or deposits were observed, having likely been collected by local residents. Other precontact archaeological sites are located near shorelines. Historic-era archaeological sites associated with Fort Lawton have been identified west of the site. These include a historic building foundation and a historic dump site used by the military. No archeological sites have been recorded within the Fort Lawton site.

Potential for Unrecorded Cultural Resources

The DAHP statewide predictive model uses data about the locations of known archaeological sites to identify where previously unknown archaeological sites are more likely to be found. Based on this model, the Fort Lawton site is mostly ranked “Survey Highly Advised: High Risk” with some areas of “Very High Risk” and “Moderate Risk.” However, the Fort Lawton site location is considered to have low potential overall to contain as-yet unknown archaeological sites due to the extent of prior ground disturbance for the former military uses. Field observations support this conclusion, with no aboveground evidence of archaeological sites observed. If precontact archaeological materials do exist within the site, they could include the remains of habitation sites, lithic scatters or similar features representing domestic, subsistence or ceremonial activities. Historic period archaeological materials would most likely be related to military activities.

(See **Appendix H** for details on existing historic and cultural resources on and near the Fort Lawton site.)

Talaris Site

Historic Resources

Site Historical Context

In the 1960s and 1970s, the Talaris site was developed as the Battelle Memorial Institute. Apartment buildings A, B and C, and Seminar Building D were built during phase one of construction, from 1965-1967. Lodge Building E, Dining Building F and Office Building G were built during phase two, 1970-1971. NBBJ, Inc. was the design architect for the Battelle Memorial Institute in both phases. The designed landscape includes a water feature and pedestrian bridge, as well as natural and ornamental landscaping. The firm of Richard Haag Associates was responsible for both the conceptual Master Plan and landscape design. The Battelle campus was used for educational seminars, conferences and workshops and as an advanced study center.

In 1997, Battelle sold the property to ERA Communities of Laurelhurst, and in 2000, ERA Communities sold the property to 4000 Property, LLC. The property was leased to the Talaris Research Institute which used the facilities to study early childhood development. In 2012, Talaris Research was sold to a Maryland-based company. The property is currently used as a conference center, known as the Talaris Conference Center. In 2013, the buildings and landscaping at the Talaris site were designated as an historic landmark by city of Seattle. The site has been determined eligible for listing in the NRHP. The buildings and landscaping are also considered to have local and national significance (see **Appendix H** for details about the history of the Talaris site).

Site Buildings

There are currently nine buildings on the Talaris site. Other features are also present. **Figure 3.9-2** depicts the locations of the buildings and features and **Table 3.9-2** lists the buildings and features onsite and years of construction.

Table 3.9-2
TALARIS SITE – EXISTING BUILDINGS & STRUCTURES

Building Number (Use)	Build Date
Buildings	
Apartment Building A	1966
Apartment Building B	1966
Apartment Building C	1966
Seminar Building D	1966
Lodge Building E	1971
Dining Building F	1971
Office Building G	1971
Equipment Shed	Unknown (after 1992)
Pumphouse	2001
Other Features	
Water Feature (Pond)	1967
Pedestrian Bridge	1971

Source: CRC, 2017.

Talaris Vicinity

Approximately 130 historic resources have been identified within approximately 500 feet of the Talaris site. There resources are early to middle twentieth century single-family residences.

Cultural Resources

Archaeological Context

The archeological context of the Talaris site is as described for the Fort Lawton site.

Ethnographic Context

The Talaris site is located along the same canoe route connecting Puget Sound to Lake Washington as discussed in the Fort Lawton ethnographic context section. The Talaris site was in the homeland of the Lakes Duwamish. Precontact Suquamish settlements were often located on major waterways and heads of bays or inlets. The Muckleshoot Indian Tribe includes the descendants of an amalgam of tribes that lived in the Green River and White River valleys.

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Note: This figure is not to scale



Source: Cultural Resource Consultants, 2017.

Figure 3.9-2
Talaris Existing Buildings

Previously Recorded Sites and Surveys

Seven archaeological sites have been recorded within one mile of the Talaris site (see **Appendix H** for details). The closest archaeological site to the Talaris site is located 0.19 mile away from the site and has been recommended eligible for NRHP based on its high structural and depositional integrity and potential to provide significant historic information. Precontact sites recorded near the site are limited to two precontract isolates. Both isolates were found in disturbed sediments and not in association with intact cultural deposits. The precontact sites were recommended not eligible for listing in the NRHP. No archeological sites have been recorded within the Talaris site.

Potential for Unrecorded Cultural Resources

The DAHP statewide predictive model ranked the Talaris site “Survey Highly Advised: Very High Risk.” The Talaris site has been previously altered by earthmoving activity but is considered to have moderate potential for as-yet unknown archeological sites due to the presence of the historical Union Bay shoreline and Holocene peat deposits on the site. As with the Fort Lawton site, precontact-era archaeological materials could include the remains of habitation sites, lithic scatters or similar features representing domestic, subsistence, or ceremonial activities. Historic period archeological materials could be associated with homesteading or farming.

(See **Appendix H** for details on existing historic and cultural resources on and near the Talaris site.)

3.9.2 Impacts of the Alternatives

An analysis of the potential adverse historic and cultural resources impacts of Alternative 1, the Applicant’s Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant’s Preferred Alternative)

Fort Lawton Site

Historic Resources

Except for OMS Building 245, all existing buildings and structures on the site would be demolished, including Harvey Hall which is recommended eligible for nomination as a Seattle Landmark. Existing buildings to be removed would need to be referred to the City Landmarks Preservation Board for consideration, following the process described in more detail in **Appendix H**. If a building is determined eligible for City Landmark status,

requirements for mitigation of impacts to historic sites would be determined by the Landmarks Preservation Board.

The adjacent Fort Lawton Cemetery would not be indirectly (e.g., visually) affected by redevelopment under Alternative 1.

Cultural Resources

Development under Alternative 1 would include minimal site grading because proposed buildings would be designed to conform to the existing site topography. Undeveloped areas of the site are forested and sloped and would not have been suitable for occupation or other activities with potential to generate significant archaeological deposits. As described previously, Fort Lawton is considered to have a low potential to contain as-yet unknown archaeological sites due to the extent of prior ground disturbance. For these reasons, the probability of impacts to archaeological resources under Alternative 1 is considered low.

Talaris Site

Under Alternative 1, the Talaris site would not be redeveloped and historic and cultural resources would remain as under existing conditions. No impacts to historic or cultural resources are expected.

Alternative 2 – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Historic Resources

Under Alternative 2, all buildings and structures would be demolished, including Harvey Hall, a building that is recommended eligible for nomination as a Seattle Landmark. Like Under Alternative 1, existing buildings to be removed would need to be referred to the City Landmarks Preservation Board for consideration. If a building is determined eligible for City Landmark status, requirements for mitigation of impacts to historic sites would be determined by the Landmarks Preservation Board.

Indirect impacts to the adjacent Fort Lawton Cemetery would occur due to the construction of a road and housing in proximity to the eastern cemetery boundary. This would affect the integrity of setting of the NRHP-eligible cemetery through the introduction of new built environmental elements.

Cultural Resources

Like under Alternative 1, the probability of encountering archaeological impacts is low. Although Alternative 2 could include the construction of retaining walls and/or deep

foundations and more overall ground disturbance, the likelihood of impacting as-yet unknown archaeological sites is low given the extent of prior ground disturbance at the site.

Talaris Site

Historic Resources

Under Alternative 2, all of the site's major buildings and most of the landscaping would be retained. However, impacts to this designated Seattle Landmark and NRHP-eligible site would be generated by proposed alterations to the existing campus and buildings. Specifically, impacts would occur due to alterations to the designed landscape and any interior alterations visible from the outside. The massing of units in large groups along NE 41st Street and deeper within the site would also be inconsistent with the siting and design of existing buildings and the surrounding neighborhood. Removal of vegetation planted as a part of the landscape design would also be considered an impact.

Cultural Resources

As described previously, the Talaris site is considered to have a moderate potential for as-yet unknown archaeological sites due to the presence of the historical Union Bay shoreline and Holocene peat deposits. Under Alternative 2 minimal grading is anticipated; however, construction of retaining walls and/or deep foundations could be necessary, leading to the possibility of localized impacts to archaeological resources.

Alternative 3 - Public Park Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Historic Resources

Under Alternative 3, direct impacts to historic resources (e.g., Harvey Hall) would be the same as described under Alternatives 1 and 2.

Indirect impacts to the Fort Lawton Cemetery are not anticipated because new construction would not occur adjacent to the cemetery. A forested buffer would be retained east of the cemetery and a multiuse field would be located north of Texas Way W, to the north of the cemetery.

Cultural Resources

The potential for impacts to archaeological resources would be the same as described for Alternatives 1 and 2 (i.e., the potential for impacts would be low).

Talaris Site

Potential impacts to historic and cultural resources on and near the Talaris site would be the same as those described under Alternative 2, because the same development is proposed.

Alternative 4 – No Action Alternative

Under the No Action Alternative, the Fort Lawton and Talaris sites would not be redeveloped at this time and would remain in their existing conditions. Buildings at Fort Lawton would likely continue to deteriorate. The Army may choose to retain the property in caretaker status, or could sell it to another party. Future development of the property by others would have the potential to impact the setting of the Fort Lawton Cemetery and would likely involve removing existing buildings. Under the No Action Alternative, the Talaris property could be sold to another party. Future use and development of the property would be subject to the City's Certificate of Approval process because it has been designated a Seattle Landmark.

3.9.3 Mitigation Measures

The following measures have been identified to address the potential historic and cultural resources impacts from construction and operation of the Fort Lawton Project under Alternatives 1, 2 and 3. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

Legally-Required Measures

- Existing buildings that appear to meet the criteria for landmark designation and are proposed to be demolished at the Fort Lawton site shall be referred to the City's Landmark Preservation Board (LPB) for their consideration as a City Landmark. If a building is designated as City Landmark, a Certificate of Approval will be required before any changes requiring a Certificate of Approval can be made to the landmark (see **Appendix H** for details).
- Under Alternatives 2 and 3, proposed development at Talaris would be reviewed by the City Landmarks Preservation Board. Any changes to the site would comply with the designating ordinance or Controls and Incentives Agreement for the property. Proposed changes should also meet the Secretary of the Interior's Standards for Rehabilitation and Secretary of the Interior's Standards with Guidelines for the Treatment of Cultural Landscapes.

- Should any as-yet unknown potentially significant archaeological sites be encountered during construction and it is not possible to avoid them, impacts would be minimized by one or more of the following:
 - Limiting the magnitude of the proposed work;
 - Modifying proposed development through redesign or reorientation to minimize or avoid further impacts to resources; or
 - Archaeological monitoring, testing, or data recovery excavations (DAHP 2010).
- Other measures that could be implemented to minimize adverse impacts to an archaeological site include:
 - Relocating the project on the site;
 - Providing markers, plaques, or recognition of discovery;
 - Imposing a delay of as much as 90 days (or more than 90 days for extraordinary circumstances) to allow archaeological artifacts and information to be analyzed; or
 - Excavation and recovery of artifacts (DON 2015).
- Under Alternatives 2 and 3, an archaeological survey would be conducted prior to development at the Talaris site due to the moderate potential for subsurface archaeological sites to be present.
- If ground disturbing or other activities result in the inadvertent discovery of archaeological deposits, work would be halted in the immediate area and contact made with DAHP. Work would be halted until further investigation and appropriate consultation is concluded.
- In the unlikely event of the inadvertent discovery of human remains, work would be immediately halted in the area, the discovery covered and secured against further disturbance, and contact made with law enforcement personnel, consistent with the provisions in RCW 27.44.055 and RCW 68.60.055.

Other Possible Measures

- Under Alternative 2, an undeveloped buffer could be retained around Fort Lawton Cemetery to avoid affecting its integrity of setting through introduction of new built environment elements.
- Under Alternatives 2 and 3, interpretive information conveying the historical significance of the Talaris site could be used as public education tools or integrated into future planning and design efforts.

3.9.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse historic or cultural resources impacts are anticipated.

3.10 TRANSPORTATION

This section of the DEIS describes the transportation conditions on and near the Fort Lawton and Talaris sites. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified. The section is based on the *Revised Transportation Impact Analysis* report prepared by Transportation Engineering Northwest (see **Appendix I**).

Key Findings

Access through the Fort Lawton site is currently provided by Texas Way W. There are presently no on-site sources of traffic. In the Fort Lawton study area, all intersections presently operate at an acceptable LOS B or better and are expected to continue at the same levels in 2030 without the Fort Lawton project. Access through the Talaris site is currently provided by NE 41st Street. The Talaris Conference Center periodically generates traffic from conference center guests and employees. In the Talaris site study area, the NE 45th Street/Union Bay Place/Mary Gates Memorial Drive intersection currently operates at an unacceptable LOS E during the PM peak hour and is expected to degrade to LOS F by 2030 without the project. The other study intersections currently operate at an acceptable LOS D or better and are expected to remain at the same levels in 2030 without the project.

Under Alternatives 1, 2 and 3, truck traffic and employee traffic would temporarily increase during construction activities for development at the Fort Lawton and Talaris sites. With implementation of a Construction Management Plan, and due to the temporary nature of the truck and employee traffic, this increase in traffic is not expected to result in significant impacts.

With development at the Fort Lawton site under Alternatives 1 and 3, the existing access provided by Texas Way W would be retained; no additional access points to the surrounding neighborhood would be provided. Under Alternative 2 at the Fort Lawton site, access would continue to be provided from the south at Texas Way W/Government Way but would terminate at a cul-de-sac to the north; four additional access points to the surrounding neighborhood would be provided. With development under Alternatives 2 and 3 at the Talaris site, the existing site access would remain the same. At full buildout, Alternatives 1, 2 and 3 would increase daily vehicle trips above existing levels in the Fort Lawton and Talaris vicinities. However, no significant LOS changes are expected at intersections near either of the sites. Under Alternatives 1 and 3, peak parking demand could exceed supply at the Fort Lawton site. Excess parking demand could be addressed through parking management strategies. As a result, no significant transportation impacts are expected during operation of the project.

Methodology

The transportation analysis was performed using best practice methodologies developed by the Institute of Transportation Engineers (ITE). The Affected Environment section describes various elements of the transportation system as they currently exist and changes that could occur in the future without the proposed project. All future analyses were performed for the year 2030 to be consistent with other transportation planning efforts in Seattle.

Trip generation for the EIS alternatives was estimated using the recommended methodology in the ITE current edition of the *Trip Generation Handbook*. Average ITE trip rates for the affordable housing were adjusted to account for anticipated mode-of-travel characteristics from the year 2010 Census compiled by the PSRC. Analysis performed for a similar project¹ was reviewed to determine the appropriate trip generation for the Senior Supportive Housing. Trip generation for the athletic fields was estimated based on an analysis of a similar facility.²

The trip distribution pattern for the residential trips was developed using data from the City of Seattle's Concurrency Director's Rule 5-2009. The City's database does not have information about recreational trips. Therefore, the trip distribution pattern for the athletic field trips was based on existing travel patterns at the entrance to Discovery Park as well as trip patterns at the other study area intersections.

A level of service analysis was conducted for the study area intersections for AM and PM peak hour conditions under the EIS alternatives. Level of service is a qualitative measure used to characterize traffic operating conditions. The quality of traffic conditions is graded from LOS A, the best and represents good traffic operations with little or no delay to motorists, through LOS F, the worst and indicates poor traffic operations with long delays. The City of Seattle does not have an adopted level of service standard for individual intersections; however, typically considers operation of LOS D as acceptable. The City may tolerate delays in the LOS E or F range for minor movements at un-signalized intersections or at signalized intersections where additional traffic control measures are not applicable or desirable. Levels of service were determined using the *Synchro 10.1* traffic operations analysis software. The models reflect current intersection geometries and levels of service were reported based upon guidelines presented in the *Highway Capacity Manual*.³

Parking demand was estimated for the EIS alternatives based on rates compiled from a variety of sources. Parking demand for single-family and multi-family households was determined from data compiled by the Puget Sound Regional Council (PSRC) from the 2010 Census. Parking demand for the Alternative 1 Senior Supportive Housing was determined

¹ *Ballard Senior Housing Project*, Heffron Transportation, 2012.

² *Parking and Transportation Impact Analysis for the Loyal Heights Playfield Improvements*, Heffron Transportation, 2006.

³ *Highway Capacity Manual*, 6th Edition, Transportation Research Board, 2016.

from analysis completed for another senior housing project.⁴ Parking demand for the proposed athletic fields was based on an analysis for similar facilities.⁵

(See **Appendix I** for details on the transportation analysis methodology.)

3.10.1 Affected Environment

This sub-section describes existing transportation system and traffic conditions on and near the Fort Lawton and Talaris sites.

Fort Lawton Site

Roadway Network

Vehicular access through the Fort Lawton site is presently provided by Texas Way W, a street that generally passes north-south through the site. The primary access point to the site is from the south via the intersection of Texas Way W and W Government Way. Secondary access is available from the north via the intersection of Texas Way W and 40th Avenue W. There are several former vehicular access points to the site from 36th Avenue W; however, these access locations are currently closed.

Study area intersections near Fort Lawton were selected based on the vehicular travel routes expected to be used to access and egress the site. The following four intersections were evaluated for both the morning and afternoon peak hours.

- 40th Avenue E / Texas Way;
- Discovery Park Boulevard / Texas Way;
- W Government Way / 36th Avenue W; and
- Discovery Park Boulevard / 34th Avenue W.

All the study area intersections are currently un-signalized. Roadways in the Fort Lawton study area were inventoried and are described in **Appendix I**. No major changes are planned for area streets or intersections.

Traffic Volumes

Existing traffic volumes in the Fort Lawton vicinity are primarily generated by local residential development and visitors to Discovery Park. Based on observations and seasonal counts at Magnuson Park—which offers similar types of recreational opportunities—traffic volumes at Discovery Park are expected to be highest during the summertime. They are expected to peak in the morning when parents drop off students who participate in day camps offered at the park. Peak period turning movement counts were conducted at all

⁴ *Ballard Senior Housing Project*, Heffron Transportation, Inc., Ballard Senior Housing Project Parking Needs Assessment, July 25, 2012.

⁵ *Parking and Transportation Impact Analysis for the Loyal Heights Playfield Improvements*, Heffron Transportation, Inc. March 2006.

Fort Lawton site study area intersections in July 2017. The highest existing hourly volumes in the morning began at 8:00 AM at all intersections. The highest afternoon hourly volumes varied from times starting between 4:00 and 5:00 PM (see **Appendix I** for the existing (2017) and 2030 No Action traffic volumes).

Future traffic volumes were forecast for the year 2030. Historical traffic counts conducted by the Seattle Department of Transportation (SDOT) in the study area indicate that both daily and peak hour volumes have decreased in the past decade and there is little growth from new development expected in the immediate vicinity. Based upon these trends, it was determined that a rate of 1.0% per year would result in a conservatively high estimate of traffic growth from new development activity in the vicinity.

Traffic Operations

Table 3.10-1 summarizes level of service results for existing and 2030 No Action (without the project) conditions. As shown, all intersections in the study area currently operate at LOS B or better and are expected to continue at the same levels in 2030 without redevelopment of the Fort Lawton site.

**Table 3.10-1
LEVEL OF SERVICE NEAR FORT LAWTON SITE - EXISTING & 2030 NO ACTION**

Intersection	AM Peak Hour				PM Peak Hour			
	Existing (2017)		2030 No Action		Existing (2017)		2030 No Action	
	LOS ¹	Delay ²	LOS	Delay	LOS	Delay	LOS	Delay
All-Way Stop-Controlled								
W Government Way / 34 th Avenue W	B	10.3	B	11.5	B	11.0	B	12.2
W Government Way / Discovery Park Boulevard / 36 th Avenue W	A	8.3	A	8.6	A	9.3	A	10.0
Side-Street Stop-Controlled								
40 th Avenue E / Texas Way (<i>overall</i>)	A	4.8	A	4.5	A	4.6	A	4.5
Westbound Movements	A	8.9	A	9.0	A	9.6	A	9.8
Southbound Left Turns	A	7.3	A	7.4	A	7.5	A	7.5
Discovery Park Blvd / Texas Way (<i>overall</i>)	A	0.6	A	0.7	A	2.5	A	2.6
Eastbound Left Turns	A	0.0	A	0.0	A	7.5	A	7.6
Southbound Movements	B	10.3	B	10.6	B	10.7	B	11.2

Source: Heffron Transportation, Inc., 2017.

Determined using the Synchro 10.1 software.

1. Level of service.

2. Average seconds of delay per vehicle.

Parking

There is one existing publicly-accessible 73-space parking lot on the Fort Lawton site, located between Building 245 and the structures to the south. Three other parking lots on the site are closed to the public and have an unknown number of parking spaces. Adjacent to the site, on-street parking is provided along certain streets that front or connect to the site.

Traffic Safety

Collision data for the study area intersections outside of Discovery Park was obtained from SDOT (SDOT does not collect collision data inside the park and no data are available for the Texas Way/40th Avenue W intersection). The historical collision data reflects the period between July 1, 2014 and July 31, 2017. Zero or one collision was reported at each intersection over the three-year study period. Overall, these data do not indicate any unusual traffic safety conditions in the study area.

Transit

King County Metro Transit Route 33 provides two-way bus service along Texas Way W through the Fort Lawton site. Within a half mile of the site, Metro Route 24 provides service with stops in both directions along 34th Avenue W. King County Metro's *Long Range Plan*⁶ indicates that the existing level of local bus service is planned to remain through its long-range planning year of 2040. It also identifies provision by 2040 of additional "frequent" bus service (defined as buses that are so frequent that a schedule is not needed) along a route that includes W Government Way and 34th Avenue W.

Non-Motorized Facilities

There is a continuous sidewalk on the west side of Texas Way W between Discovery Park Boulevard and the north gate to Fort Lawton; about a 200-foot segment of Texas Way W between the gate and 40th Avenue NE has no sidewalk or shoulder. Sidewalks are present on both sides of the street along W Government Way and 34th Avenue W and are intermittent along 36th Avenue W. There is a multi-use path on the south side of Discovery Park Boulevard west of 36th Avenue W, and no sidewalk or walkway on the north side of that street. W Government Way has marked crosswalks along the north, south and east legs at its intersection with 36th Avenue W and across all legs at its intersection with 34th Avenue W. Crosswalks are also present across Texas Way W near the Veterans Affairs (VA) facility. Narrow painted bicycle lanes are present on W Government Way in both directions. There is an extensive non-motorized trail system within Discovery Park just west of the site. The trail system can be reached via Discovery Park Boulevard or Texas Way.

(See **Appendix I** for details on existing transportation system and traffic conditions on and near the Fort Lawton site.)

Talaris Site

Information about the transportation system near the Talaris site was obtained from a recent study of that property⁷ and updated with information from field observation and other sources as described in the following sections.

⁶ King County Metro, Metro Connects: Long Range Plan 2016, Adopted January 2017.

⁷ *Transportation Impact Analysis for the 4000 Property*, The Transpo Group, October 2013.

Roadway Network

The Talaris site is currently accessed from NE 41st Street; a second access to 38th Avenue NE is currently closed to vehicular traffic. The following intersections were evaluated for the Talaris site.

- NE 45th Street/Union Bay Place NE/NE 45th Place/Mary Gates Memorial Drive NE;
- NE 45th Street/Sand Point Way NE/38th Avenue NE;
- Sand Point Way NE/40th Avenue NE; and
- NE 41st Street/41st Avenue NE.

The NE 41st Street / 41st Avenue NE intersection is unsignalized and the other three are signalized. Roadways in the Talaris study area were inventoried and are described in **Appendix I**. No major geometry changes are planned for area streets or intersections. However, traffic signal timings were optimized for analysis of future conditions to account for future Intelligent Transportation System (ITS) improvements planned along Sand Point Way NE and NE 45th Street.

Traffic Volumes

Two studies previously conducted in the area found that the highest volume traffic occurs during the PM peak hour;^{8,9} therefore, the PM peak hour was analyzed for the Talaris site. PM peak hour intersection turning movement counts for the four analysis intersections were performed in October 2013 for the prior study of the Talaris site. That study had forecast conditions to 2017 assuming a 1% per year background growth rate plus traffic generated by three large projects in the vicinity (Children's Hospital Expansion, NE 46th Street Multi-Use Building and University Village Expansion). The 2017 volumes developed for the prior study were applied to the existing conditions analysis completed for this Draft EIS.

Future traffic volumes were forecast for the year 2030, using a growth rate of 1% per year, consistent with a past study¹⁰ (see **Appendix I** for the existing (2017) and 2030 No Action traffic volumes).

Traffic Operations

Traffic operations analyses were performed for the Talaris site using the same methodology described for the Fort Lawton site. **Table 3.10-2** presents level of service results for the existing and 2030 No Action conditions. As shown, the "five corners intersection" at NE 45th Street/Union Bay Place/Mary Gates Memorial Drive currently operates at LOS E during the PM peak hour and is expected to degrade to LOS F by 2030 under No Action conditions. The intersection at Sand Point Way/40th Avenue NE currently operates at LOS D and the other two

⁸ *Transportation Impact Analysis for the 4000 Property*, The Transpo Group, October 2013.

⁹ *Sand Point Way Corridor Study*, Heffron Transportation, Inc., Draft Report, March 2017.

¹⁰ *Sand Point Way Corridor Study*, Heffron Transportation, Inc., Draft Report, March 2017.

analysis intersections are operating at LOS B; all are expected to remain at those levels in 2030 under No Action conditions.

Table 3.10-2
LEVEL OF SERVICE NEAR TALARIS SITE – EXISTING & 2030 NO ACTION

Intersection	PM Peak Hour			
	Existing (2017)		2030 No Action	
	LOS	Delay	LOS	Delay
Signalized				
NE 45 th Street / Union Bay Place NE / NE 45 th Place Mary Gates Memorial Drive NE	E	63.7	F	87.4
NE 45 th Street / Sand Point Way NE / 38 th Avenue NE	B	12.6	B	12.2
Sand Point Way NE / 40 th Avenue NE	D	39.7	D	54.7
Side-Street Stop-Controlled				
NE 41 st Street / 41 st Avenue NE (<i>overall</i>)	A	0.7	A	0.6
Westbound Left Turns	A	8.2	A	8.3
Northbound Movements	B	11.5	B	11.9

Source: Heffron Transportation, Inc., 2017.

Determined using Synchro 10.1 software. Cycle lengths, offsets, and splits optimized for signalized intersections in the NE 45th Street / Sand Point Way corridor for the 2030 w/o project condition.

1. Level of service.
2. Average seconds of delay per vehicle.

Parking

The existing Talaris site has a substantial amount of on-site parking that serves the existing buildings and its function as a conference center. Adjacent to the site, on-street parking is provided along all the streets that front or connect to the site.

Traffic Safety

Collision data for the study area intersections surrounding the Talaris site were obtained from SDOT. Data reflect the period between July 1, 2014 and July 31, 2017 and showed that on average all study area intersections experienced fewer than two collisions per year. One of the reported collisions at the NE 45th Street/Mary Gates Memorial Drive intersection involved a bicyclist. There were no fatalities. Overall, these data do not indicate any unusual traffic safety conditions, and none of the intersections would meet the City's definition of a high collision location.

Transit

Metro provides bus service near the Talaris site. The nearest stops, serviced by Route 78, are located at the southeast corner of the site, at the NE 41st Street/42nd Avenue NE intersection. Metro Routes 31, 32, 65, 67 and 75 also serve the site with stops along NE 45th Street, at the intersections of 36th Avenue NE and 42nd Avenue NE. King County Metro's

*Long Range Plan*¹¹ indicates that the existing level of local bus service is planned to remain through its long-range planning year of 2040. It also identifies provision of additional RapidRide service (frequent two-way bus service with amenities that facilitate faster passenger loading and unloading) by 2025 for a route that includes NE 45th Street and Sand Point Way NE.

Non-Motorized Facilities

All of the Talaris study area streets have sidewalks on both sides, except for NE 41st Street, which has no sidewalk along the site frontage (north side of the street). All signalized intersections have pedestrian crosswalks and signals and there is a pedestrian-only signal to assist crossing NE 45th Street at 36th Avenue NE. The Burke-Gilman Trail is located north of 45th Avenue NE and west of Sand Point Way. There are connections to the trail at 36th Avenue NE and from the 40th Avenue NE/Sand Point Way intersection. Pedestrian facilities on the existing Talaris campus consist of short segments of sidewalk where drop-off/pick-up activities occur as well as paved trails that connect between buildings. There are no pedestrian facilities along the driveways that connect to the city street network.

(See **Appendix I** for details on existing transportation system and traffic conditions on and near the Talaris site.)

3.10.2 Impacts of the Alternatives

An analysis of the potential adverse transportation impacts of Alternative 1, the Applicant's Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be like the Preferred Alternative).

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant's Preferred Alternative)

Fort Lawton Site

Construction

Alternative 1 would generate construction truck traffic and employee traffic associated with demolition, excavation, infrastructure construction, building construction and landscaping. Internal roadways would be upgraded and/or replaced. The highest number of truck trips per day would be generated during excavation activities when large quantities of materials can be stockpiled on site and then hauled off in a compressed schedule. Based upon typical construction shifts, it is anticipated that construction workers would arrive at the construction site before the morning peak traffic period on local area streets and depart the

¹¹ King County Metro, Metro Connects: Long range Plan 2016, Adopted January 2017.

site prior to the evening commute peak period. The number of workers at the project site at any one time would vary depending upon the construction element being implemented. Construction worker trips typically peak during building construction when many trades can be working simultaneously at the site.

For all these construction activities, it is unlikely that Alternative 1 would generate more trips per hour than evaluated for the full build condition (see below under Operation for details). Therefore, the vicinity roadway systems would be able to accommodate the construction traffic. All truck staging and contractor parking should be able to be accommodated on the site.

Prior to commencing construction, the selected contractor(s) would prepare a Construction Management Plan. This plan would include information related to truck haul routes, staging areas, sidewalk and street detours and employee parking. As a result, no significant transportation impacts are expected during construction of the project (see **Appendix I** for details).

Operation

Project Trips

The number of vehicle trips generated by Alternative 1 is summarized in **Table 3.10-3**. Alternative 1 would generate an estimated 1,260 vehicle trips per day (630 inbound and 630 outbound) with 64 trips during the AM peak hour and 216 during the PM peak hour.

**Table 3.10-3
VEHICLE TRIP GENERATION – ALTERNATIVE 1**

Land Use	# of Units/ Fields	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
Senior Housing	86 ¹	150	7	2	9	2	7	9
Apartments (Rental)	100	430	7	26	33	26	14	40
Townhomes (Ownership)	52	300	6	16	22	16	11	27
Single-Family (Market-Rate)	0	0	0	0	0	0	0	0
Athletic Fields	2	380	0	0	0	70	70	140
Total Vehicle Trips		1,260	20	44	64	114	102	216

1. Includes 85 senior units and one manager unit

Source: Heffron Transportation, Inc., 2017.

During the peak hours, most residential trips from Alternative 1 would be associated with commute trips to major employment areas such as downtown Seattle, Ballard and Interbay; some peak hour residential trips could be to local areas such as schools and shopping districts. Peak trips to and from the athletic fields are expected to be associated with youth practice activities and as such, are primarily expected to be attracted from the local Magnolia neighborhood. In terms of trip distribution, the data indicate that 78% of all inbound trips during the PM peak hour would be from areas outside of Magnolia, the

remaining 22% would be local Magnolia trips. For the outbound trips, 38% would be local Magnolia trips and the rest to outside neighborhoods. The reverse of these patterns was assumed for the AM peak hours. The City's database does not have information about recreational trips. Therefore, the trip distribution pattern for the athletic field trips was based on existing travel patterns at the entrance to Discovery Park as well as trip patterns at the other study area intersections (see **Appendix I** for the trip distribution patterns under Alternative 1). Trips were assigned to the roadway network (see **Figure 3.10-1**, Fort Lawton Trip Assignment – Alternatives 1 and 3).

Traffic Operations

The trip generation and trip assignments determined that Alternative 1 would add the most traffic to area intersections of the EIS alternatives. Traffic operations with Alternative 1 were evaluated to show the potential impacts associated with the project and are compared to the No Action condition (see **Table 3.10-4**). As shown, all study area intersections are expected to continue to operate at LOS B or better with slight increases in delay associated with the additional trips Alternative 1 would generate. Therefore, no significant impacts are expected.

Table 3.10-4
LEVEL OF SERVICE NEAR FORT LAWTON SITE 2030 – ALTERNATIVE 1

	AM Peak Hour				PM Peak Hour			
	2030 No Action		2030 w/ Alt. 1		2030 No Action		2030 w/ Alt. 1	
	LOS ¹	Delay ²	LOS	Delay	LOS	Delay	LOS	Delay
All-Way Stop-Controlled Intersections								
W Government Way / 34 th Avenue W	B	11.5	B	11.9	B	12.2	B	14.1
W Government Way / Discovery Park Boulevard / 36 th Avenue W	A	8.6	A	8.9	A	10.0	B	12.6
Side-Street Stop-Controlled Intersections								
40 th Avenue E / Texas Way (<i>overall</i>)	A	4.5	A	5.5	A	4.5	A	5.3
Westbound Movements	A	9.0	A	9.0	A	9.8	B	10.1
Southbound Left Turns	A	7.4	A	7.4	A	7.5	A	7.6
Discovery Park Blvd / Texas Way (<i>overall</i>)	A	0.7	A	1.6	A	2.6	A	4.9
Eastbound Left Turns	A	0.0	A	0.0	A	7.6	A	7.9
Southbound Movements	B	10.6	B	11.1	B	11.2	B	14.5

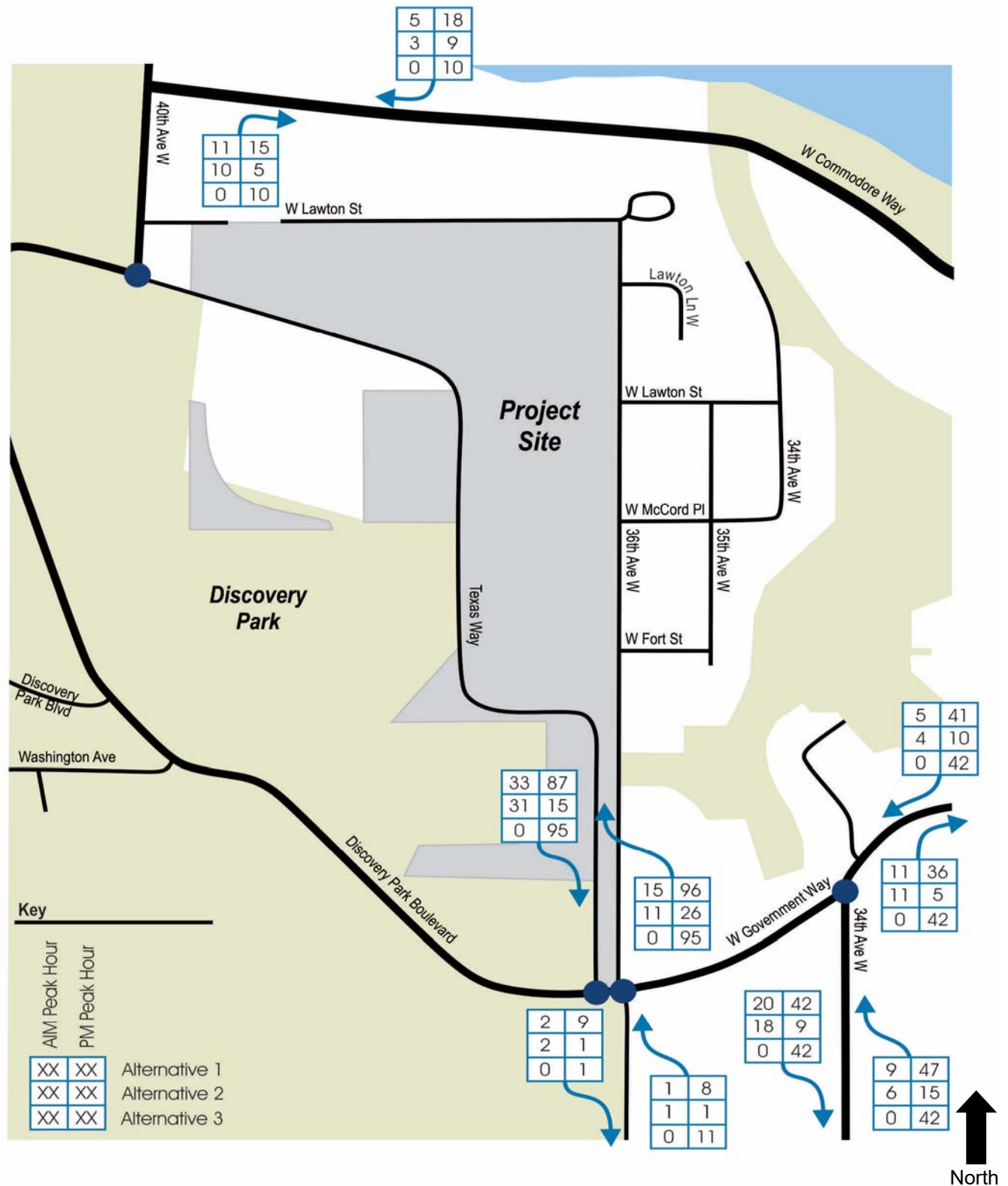
Source: Heffron Transportation, Inc., 2017.

Determined using Synchro 10.1 software.

1. Level of service.

2. Average seconds of delay per vehicle.

Fort Lawton Army Reserve Center Redevelopment Project Draft Environmental Impact Statement



Source: Heffron Transportation, Inc., 2017.

Figure 3.10-1
Fort Lawton Trip Assignment—Alternatives 1 and 3

Parking

Under Alternative 1, a total of 266 parking spaces would be provided on the Fort Lawton site (see **Table 2-7** for a breakdown of the parking spaces by use). Proposed parking would meet the requirements in the Seattle Municipal Code (SMC 23.54.015).

The peak parking demand estimated for Alternative 1 is 257 to 294 parking spaces. Therefore, at the high end of the range, parking demand would exceed parking supply, particularly for the affordable housing and athletic fields. The excess parking demand from the affordable housing could be addressed through parking management strategies. The excess parking demand from the athletic fields could be addressed through sharing of parking with the existing parking at the VA facility offsite and/or the Seattle Parks Maintenance Facility onsite given that the peak demand would occur in the evenings and weekends when these facilities are minimally used. Therefore, no significant impacts are expected.

Traffic Safety

Alternative 1 would increase traffic at the study area intersections and statistically, the number of collisions could increase as traffic increases. However, historical collision data show that there are no existing safety issues in the Fort Lawton vicinity. Alternative 1 would not change the roadway network--although several new intersections would be created along Texas Way--and is not expected to result in new safety issues in the neighborhood.

Transit

Mode-of-travel data from the 2010 Census determined that 25% of residential trips in Magnolia occur by transit. None of the athletic field trips are expected to use transit. At this rate, Alternative 1 is expected to generate 28 peak hour transit trips. The projected additional transit demand averages to about 2 to 3 riders per bus that currently serves the Fort Lawton site during the peak hour. The existing bus service would be adequate to serve this demand; therefore, no adverse transit impacts are expected.

Non-Motorized Transportation

Pedestrian facilities would be provided along all the new streets and upgraded along Texas Way W. Texas Way W currently has a continuous sidewalk along only the west side of the street and Alternative 1 would add a sidewalk to the east side of the street adjacent to new development and to connect to the existing bus stop. It is noted that there are a couple of locations where the existing west-side sidewalk width does not meet Americans with Disabilities Act (ADA) standards, including where it passes through the entry gate. These could be widened, if feasible, to meet ADA standards.

Several new pedestrian crosswalks are proposed to connect housing clusters and transit stops. All new crosswalk locations would have adequate sight lines for motorists and pedestrians, and would be designed to meet *Manual on Uniform Traffic Control Devices*

(MUTCD) for *Streets and Highways*¹² standard ladder stripe standards (existing crosswalks are now painted in non-standard yellow). ADA curb ramps and landings would be provided on both sides of the street. New non-motorized facilities would be constructed according to City standards and no adverse non-motorized impacts are expected to result.

Talaris Site

No redevelopment of the Talaris site would occur at this time under Alternative 1. Transportation system and traffic conditions would continue as under existing conditions. No transportation impacts would be expected under this alternative.

Alternative 2 – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Construction

Construction activities and their associated potential for impacts on the transportation system and traffic on and in the vicinity of the Fort Lawton site would be similar to under Alternative 1 (e.g., due to construction truck traffic and employee traffic). All truck staging and contractor parking should be able to be accommodated on the site. Prior to commencing construction, the selected contractor(s) would prepare a Construction Management Plan. As a result, no significant transportation impacts are expected during construction of the project.

Operation

Project Trips

The number of vehicle trips generated by Alternative 2 is summarized in **Table 3.10-5**. This alternative would generate an estimated 700 vehicle trips per day (350 inbound and 350 outbound) with 55 trips during the AM peak hour and 55 during the PM peak hour. The same trip pattern would occur as assumed for Alternative 1 (see **Figure 3.10-1**).

Traffic Operations

Alternative 2 would generate fewer peak hour trips than Alternative 1. Therefore, the intersections in the Fort Lawton vicinity would operate at the same or better levels with Alternative 2 than reported in **Table 3.10-4**. No significant impacts are expected.

¹² US Department of Transportation – Federal Highway Administration, 2009 Edition.

**Table 3.10-5
VEHICLE TRIP GENERATION – ALTERNATIVE 2**

Land Use	# of Units/ Fields	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
Senior Housing	0	0	0	0	0	0	0	0
Apartments (Rental)	0	0	0	0	0	0	0	0
Townhomes (Ownership)	0	0	0	0	0	0	0	0
Single-Family (Market-Rate)	113	700	14	41	55	35	20	55
Athletic Fields	0	0	0	0	0	0	0	0
Total Vehicle Trips		700	14	41	55	35	20	55

Source: Heffron Transportation, Inc., 2017.

Parking

Alternative 2 is expected to generate a total peak parking demand of 180 to 201 vehicles, which would fit within the proposed parking supply of 254 spaces. No adverse parking impacts are expected (see **Appendix I** for details).

Safety

Alternative 2 would extend the existing grid of streets, creating several four-legged intersections where T-intersections now exist along 36th Avenue W. The volumes at these intersections are expected to be low and operate like other intersections in the residential neighborhood and are not expected to result in new safety issues in the Fort Lawton site area.

Transit

Alternative 2 is expected to generate 21 peak hour transit trips. The expected demand of 2 to 3 additional riders per bus would not adversely affect transit service in the Fort Lawton site area.

Non-Motorized Facilities

The pedestrian facility needs for Alternative 2 would be similar to those described for Alternative 1. Pedestrian facilities would be provided along all the new streets and upgraded along Texas Way. Any new crosswalks would be designed to meet MUTCD standards. Therefore, no significant impacts are expected.

Talaris Site

Construction

Construction activities and their associated potential for impacts on the transportation system and traffic on and in the vicinity of the Talaris site would be similar to at the Fort

Lawton site under Alternative 1 (e.g., due to construction truck traffic and employee traffic). All truck staging and contractor parking should be able to be accommodated on the site. Prior to commencing construction, the selected contractor(s) would prepare a Construction Management Plan. As a result, no significant transportation impacts are expected during construction of the project.

Operation

Project Trips

The number of vehicle trips generated by Alternative 2 is summarized in **Table 3.10-6**. This alternative would generate an estimated 880 vehicle trips per day (440 inbound and 440 outbound) with 64 trips during the AM peak hour and 76 during the PM peak hour. The Talaris site currently generates traffic. However, no credit was taken for these existing trips, which reflects a conservatively high estimate of site impacts.

**Table 3.10-6
VEHICLE TRIP GENERATION – ALTERNATIVE 2**

Land Use	# of Units/ Fields	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
Senior Housing	86 ¹	150	7	2	9	2	7	9
Apartments (Rental)	100	430	7	26	33	26	14	40
Townhomes (Ownership)	52	300	6	16	22	16	11	27
Single-Family (Market-Rate)	0	0	0	0	0	0	0	0
Athletic Fields	0	0	0	0	0	0	0	0
Total Vehicle Trips		880	20	44	64	44	32	76

Source: *Heffron Transportation, Inc., 2017.*

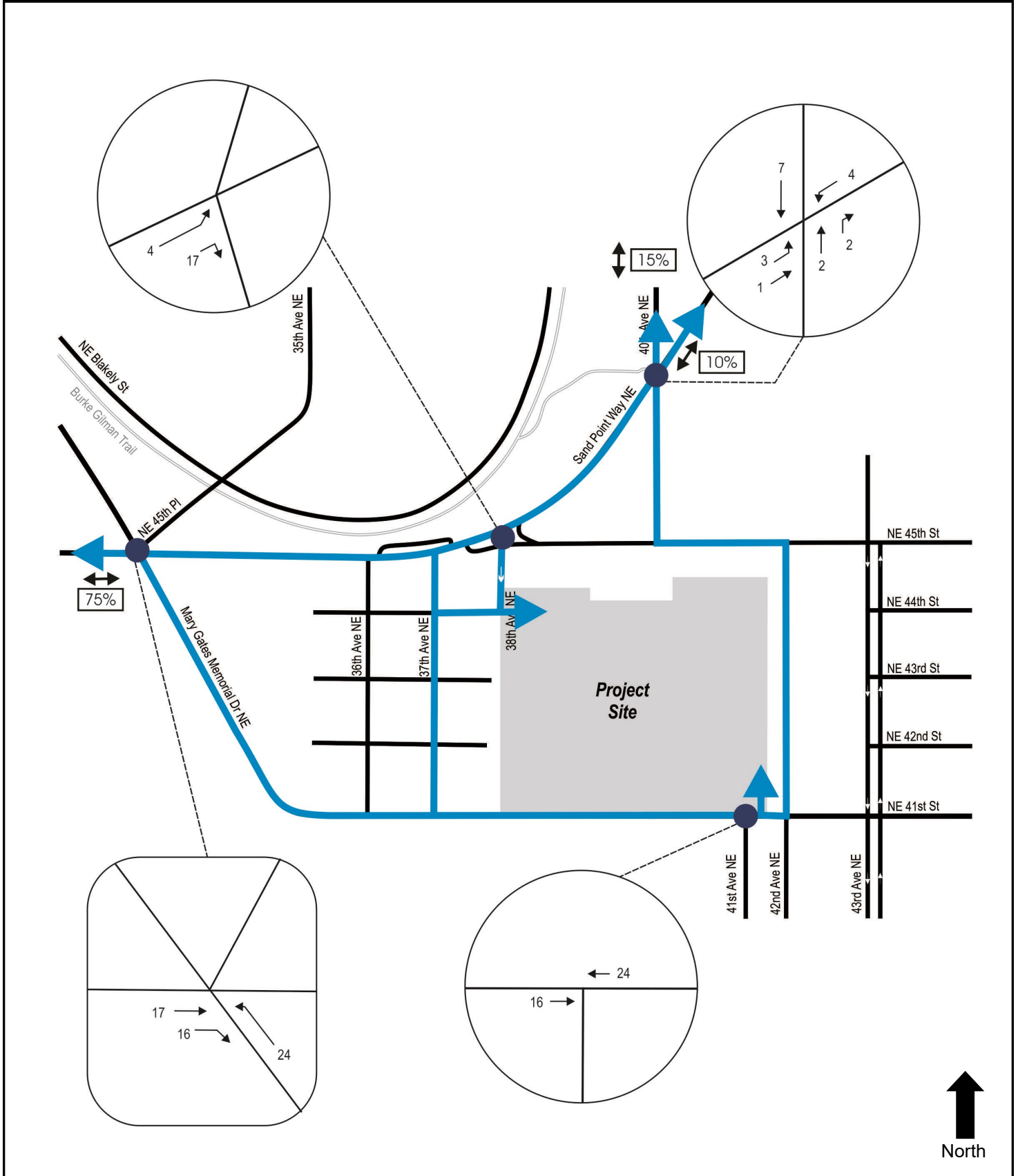
1. Includes 85 senior units and one manager unit

It is projected that about 75% of the Talaris site trips under Alternative 2 would be to and from the west on NE 45th Street. The other 25% of the trips would use 40th Avenue NE and Sand Point Way NE, north and northeast of the site (see **Figure 3.10-2**, Trip Assignment Talaris Site – Alternatives 2 and 3).

Traffic Operations

Table 3.10-7 presents the results of the traffic operations analysis for Alternative 2; levels of service for the 2030 No Action alternative are shown for comparison. As shown, the project is expected to add less than one second of delay to the intersections at NE 45th Street/Mary Gates Memorial Drive NE and Sand Point Way/40th Avenue NE intersections, which are projected to operate at LOS F and E with the project, respectively. This level of increased delay would not be considered a significant impact, and no mitigation is recommended. It is the long-standing precedent established by the City's traffic review team that delay increases less than 5 seconds at an intersection would not be significant.

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Source: Heffron Transportation, Inc., 2017.

Figure 3.10-2
Talaris Trip Assignment—Alternatives 2 and 3

**Table 3.10-7
LEVEL OF SERVICE NEAR TALARIS SITE 2030 - ALTERNATIVE 2 & 3**

Intersection	PM Peak Hour			
	2030 No Action		2030 w/ Alternative 2 or 3	
	LOS	Delay	LOS	Delay
Signalized Intersection				
NE 45 th Street / Union Bay Place NE / NE 45 th Place Mary Gates Memorial Drive NE	F	87.4	F	88.7
NE 45 th Street / Sand Point Way NE / 38 th Avenue NE Sand Point Way NE / 40 th Avenue NE	B	12.2	B	12.2
	D	54.7	E	55.5
Side-Street Stop Controlled Intersection				
NE 41 st Street / 41 st Avenue NE	A	0.6	A	0.6
Westbound Left Turns	A	8.3	A	8.4
Northbound Movements	B	11.9	B	12.1

Source: Heffron Transportation, Inc., 2017.

Determined using the Synchro 10.1 software. Cycle lengths, offsets, and splits optimized for signalized intersections in the NE 45th Street / Sand Point Way corridor for the 2030 project conditions.

1. Level of service.
2. Average seconds of delay per vehicle.

Parking

The projected total peak parking demand of 180 to 201 spaces under Alternative 2 would be accommodated by the proposed supply of 254 spaces, with no overflow. No adverse parking impacts are expected.

Traffic Safety

Under Alternative 2, the project would increase traffic at the Talaris study area intersections and statistically, the number of collisions could increase as traffic increases. However, historical collision data show that there are no existing safety issues in the Talaris vicinity. Alternative 2 does not include any changes to the roadway network that are expected to result in new safety concerns.

Transit

Alternative 2 is expected to generate 17 peak hour transit trips. This projected additional transit demand averages to less than one rider per bus that currently serves the Talaris site during the peak hour. The existing bus service would be adequate to serve this demand; therefore, no adverse transit impacts are expected.

Non-Motorized Transportation

Under Alternative 2, a new sidewalk would be constructed along the NE 41st Street frontage where no sidewalk exists today. In addition, a new sidewalk or a separated walkway would be added along internal roadways as required by the City. New non-motorized facilities

would be constructed according to City standards and no adverse non-motorized impacts are expected.

Alternative 3 - Public Park Onsite; Affordable/Homeless Housing Offsite

Fort Lawton Site

Construction

Construction activities and their associated potential for impacts on the transportation system and traffic on and in the vicinity of the Fort Lawton site would be similar to under Alternative 1 (e.g., due to construction truck traffic and employee traffic). All truck staging and contractor parking should be able to be accommodated on the site. Prior to commencing construction, the selected contractor(s) would prepare a Construction Management Plan. As a result, no significant transportation impacts are expected during construction of the project.

Operation

Project Trips

The number of vehicle trips generated by Alternative 3 is summarized in **Table 3.10-8**. This alternative would generate an estimated 570 vehicle trips per day (285 inbound and 285 outbound) with no trips during the AM peak hour and 210 during the PM peak hour. The same trip pattern would occur as assumed for Alternative 1; the trip assignment for this alternative is shown on **Figure 3.10-1**.

**Table 3.10-8
VEHICLE TRIP GENERATION – ALTERNATIVE 3**

Land Use	# of Units/ Fields	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
Senior Housing	0	0	0	0	0	0	0	0
Apartments (Rental)	0	0	0	0	0	0	0	0
Townhomes (Ownership)	0	0	0	0	0	0	0	0
Single-Family (Market-Rate)	0	0	0	0	0	0	0	0
Athletic Fields	3	570	0	0	0	105	105	210
Total Vehicle Trips		570	0	0	0	105	105	210

Source: Heffron Transportation, Inc., 2017.

Traffic Operations

Alternative 3 would generate approximately the same number of PM peak hour trips as Alternative 1, and the intersections in the Fort Lawton vicinity would operate at similar levels to those reported **Table 3.10-4**. The athletic fields are expected to generate no additional trips during the AM peak hour and would not significantly affect morning traffic operations.

Parking

Alternative 3 is expected to generate a total peak parking demand of 99 vehicles. This would exceed the estimated proposed supply of 90 spaces. Proposed parking would meet the requirements in the Seattle Municipal Code (SMC 23.54.015). Like under Alternative 1, it may be possible to share existing parking at the VA facility offsite and/or the Seattle Parks Maintenance Facility onsite in the evenings and/or on weekends when the peak field use is expected. No significant impacts are expected.

Safety

Alternative 3 would increase traffic at the Fort Lawton study area intersections, and statistically the number of collisions could increase as traffic increases. However, historical collision data show that there are no existing safety issues in the Fort Lawton vicinity. Alternative 3 would not change the roadway network and no safety impacts are anticipated.

Transit

Athletic fields proposed under Alternative 3 are expected to generate little to no transit use, and therefore would have minimal transit impacts.

Non-Motorized Facilities

The pedestrian facility need for Alternative 3 would be the similar to Alternative 1. Pedestrian facilities would be upgraded along Texas Way W. Any new crosswalks would be designed to meet MUTCD standard. Therefore, no significant impacts are expected.

Talaris Site

Development under Alternative 3 on the Talaris site would be identical to under Alternative 2. Therefore, the transportation impacts would be the same as described for Alternative 2.

Alternative 4 – No Action Alternative

Under the No Action Alternative, the Fort Lawton and Talaris sites would not be redeveloped at this time and would remain in their existing conditions. No transportation-related impacts are anticipated under Alternative 4.

3.10.3 Mitigation Measures

The following measures have been identified to address the potential transportation impacts from construction and operation of the Fort Lawton Project under Alternatives 1, 2 and 3. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible

Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

Legally-Required Measures

- Development would comply with all land use code requirements regardless of right of way improvements including any requirements for addition or upgrade of pedestrian facilities.
- Prior to commencing construction on either site, the selected contractor(s) would prepare a Construction Management Plan that documents the following:
 - Truck haul routes to and from the site;
 - Truck staging areas (e.g. locations where empty or full dump trucks would wait or stage prior to loading or unloading);
 - Construction employee parking areas;
 - Road or lane closures that may be needed during utility or street construction;
 - Sidewalk, bike lane, or bus stop closures and relocations; and
 - Mechanism for notifying the community if street, sidewalk, bike lane, or bus stop closures would be required.

Measures Proposed as Part of Project

Fort Lawton Site

- **Improve pedestrian facilities on Texas Way** – For Alternative 1, 2 or 3, Texas Way W would be improved to add a sidewalk or walkway to the east side of the street adjacent to new development areas. In addition, the existing sidewalk on the west side of the street would be maintained. New crosswalks would be located where there is adequate sight distance for both motorists and pedestrians, and all would be designed to meet Manual on Uniform Traffic Control Devices (MUTCD) standards. Americans with Disability Act (ADA) curb ramps and landings would be provided on both sides of the street.
- **Implement parking management strategies for affordable housing uses** – To reduce the potential for overflow residential parking with Alternative 1 or 2, the Office of Housing and its partners would implement programs that reduce a resident's need to own a vehicle. The programs could include providing a shared bicycle fleet or encouraging use of bike sharing programs, encouraging use of car sharing programs, and providing information about bus service.

Talaris Site

- **Improve pedestrian facilities on internal roads** – For Alternative 2 or 3, all new or retained internal roads at the Talaris site would have a pedestrian walkway on at least

on one side of the street. Any internal crosswalks would be located where there is adequate sight distance for motorists and pedestrians and all would be designed to meet MUTCD standards. ADA curb ramps and landings would be provided on both sides of the street.

- **Construct sidewalk along N 41st Street frontage** – For Alternative 2 or 3, sidewalks would be constructed along the N 41st Street site frontage where there currently are none.

Other Possible Measures

- **Share parking with athletic fields** – For Alternative 1 or 3, peak parking for the athletic fields on the Fort Lawton site is expected to occur in the evenings and on weekends. Seattle Parks and Recreation could work with the VA to share its existing nearby parking spaces offsite during these times when parking demand at the VA facility is low or use the parking spaces at the Parks Maintenance Building onsite during these times.

3.10.4 Significant Unavoidable Adverse Impacts

The project would add less than one second of delay to two intersections near the Talaris site that are projected to operate at LOS F and E. This increased delay would not be considered a significant impact, as it is the long-standing precedent established by the City's traffic review team that delay increases less than 5 seconds at an intersection would not be significant. Therefore, no significant unavoidable adverse transportation-related impacts are expected.

3.11 PUBLIC SERVICES

This section of the DEIS describes the public services that serve the Fort Lawton and Talaris sites, including police service, fire and emergency service, and public schools. Potential impacts from redevelopment of the EIS alternatives on these services are evaluated and mitigation measures are identified.

Key Findings

Police service for the Fort Lawton site is provided by the Seattle Police Department (SPD) West Precinct. Fire and emergency services are provided by the Seattle Fire Department (SFD), with the closest station being Station 41. Seattle Public Schools provides public school service and the closest schools are Lawton Elementary School, McClure Middle School and Ballard High School. Police service for the Talaris site is provided by the SPD North Precinct. Fire and emergency services are provided by SFD, with the closest station being Station 38. Seattle Public Schools provides public school service and the closest schools are Laurelhurst Elementary School, Eckstein Middle School and Roosevelt High School.

Development under Alternatives 1, 2 and 3 on the Fort Lawton and Talaris sites would result in increased demand for police and fire/emergency services during construction. These demands would be temporary, are not expected to be substantial and would cease once full buildout of the site is completed.

Increases in on-site population with development on the Fort Lawton site under Alternatives 1 and 2 would result in an increase in demand for police and fire/emergency services, as well generate new students that would attend public schools. Alternative 2 would result in less demand for public services due to fewer residential units than Alternative 1. There would be no new on-site population under Alternative 3; however, the provision of new park facilities could generate some increase in demand for police and fire/emergency services. This increased demand would be less than under Alternatives 1 or 2. New students would attend Lawton Elementary School, which is projected to be over capacity. Through tax revenues generated directly and indirectly from development of the Fort Lawton site and the service purveyors' planning processes, all of the purveyors could handle the increased demand for services from proposed development at the Fort Lawton site; therefore, no significant public services impacts are expected.

Increases in on-site population with development on the Talaris site under Alternatives 2 and 3 would result in an increased demand for police and fire/emergency services, and would generate new students that would attend public schools. New students would attend Eckstein Middle School, which is projected to be over capacity. Through tax revenues generated directly and indirectly from development of the Talaris site and the service purveyors' planning processes, all the purveyors could handle the increased demand for services from proposed development at the Talaris site; therefore, no significant public service impacts are expected.

Methodology

The analysis of public services is based on personal communication with the public service providers, including the Seattle Fire Department, Seattle Police Department and Seattle Public Schools. As appropriate, information from the most current capital facilities plans, annual reports and website data for each of the public service purveyors was also used for the analysis.

3.11.1 Affected Environment

This sub-section summarizes the existing public services that serve the Fort Lawton and Talaris sites, including police service, fire and emergency service, and public schools.

Fort Lawton Site

Police Service

The Seattle Police Department (SPD) serves five precinct areas within the city of Seattle (North Precinct, East Precinct, South Precinct, Southwest Precinct and West Precinct). The Fort Lawton site is located within the service jurisdiction of the West Precinct, which is headquartered at 810 Virginia Street (approximately four miles to the southeast of the site). The West Precinct is further divided into four sectors and 12 beats; the site is located within the Queen Sector and Beat 1 (Q1).¹

In 2016, SPD had 1,376 sworn officers, from the rank of police officer through police chief, and 513 civilian employees. The West Precinct includes approximately 183 officers and approximately 55 vehicles that are used by officers during their work in the field. The minimum number of officers assigned to a given shift is 18 officers which occurs during 1st Watch (between 3 AM and 11 AM).¹

SPD does not have adopted level of service standards or guidelines but instead uses Micro Community Policing Plans to address the priorities of specific neighborhoods. The Fort Lawton site is located within the Magnolia Micro Community Policing Plan area. Micro Community Policing Plans are designed to address the distinctive needs of each community based on community engagement, crime data and police services. Based on data collected from April 2017 through June 2017, the public safety priorities for the Magnolia Micro Community Policing Plan area were car prowls, burglaries, auto theft and car/RV/bus camping.²

¹ Personal communication with Alyssa Pulliam, Seattle Police Department Finance, Policy and Planning. September 2017.

² Seattle Police Department. Magnolia Micro Community Policing Plan.
<https://www.seattle.gov/police/community-policing/what-spd-is-doing>. September 2017.

Table 3.11-1 presents the annual number of computer aided dispatch (CAD) events for the West Precinct over the past 5 years. From 2012 to 2016, the number of dispatched events for the West Precinct has increased by approximately 9%.

**Table 3.11-1
WEST PRECINCT CAD EVENTS: 2012 – 2016**

	2012	2013	2014	2015	2016
CAD Events	110,355	128,607	112,867	116,833	120,820
% Change over Previous Year		17%	-12%	4%	3%

Source: Seattle Police Department, 2017.

More specifically, **Table 3.11-2** summarizes the annual calls for service over the last five years for the Q1 Beat, which includes the Fort Lawton site and vicinity. As noted in the table, there was a dramatic decrease in calls for service in 2013 and a sharp increase in calls for service in 2014 and 2015. Overall, calls for service have increased by approximately 7% since 2012.

**Table 3.11-2
Q1 BEAT CALLS FOR SERVICE: 2012 – 2016**

	2012	2013	2014	2015	2016
Calls for Service	3,173	457	1,372	3,306	3,406
% Change over Previous Year		-86%	200%	141%	3%

Source: Seattle Police Department, 2017.

Regarding projected future staffing needs for the SPD, the City of Seattle has called for and approved a plan to hire 200 new police officers by the year 2020.

Fire and Emergency Service

The Seattle Fire Department (SFD) provides fire protection, Basic Life Support (BLS) and Advanced Life Support (ALS)/Emergency Medical Services (EMS) throughout the city of Seattle, including the Fort Lawton site, from 33 fire stations. In 2016, the Department had 995 uniformed personnel, with an on-duty strength of 207 officers. Apparatus at all stations includes: 33 fire engines, 11 ladder trucks, 5 aid units (basic life support), 7 medic units (advanced life support), 2 air trucks, 4 fire boats and 2 hose wagons.³

The closest SFD stations to the Fort Lawton site are Fire Station 20 (2800 15th Avenue W – located approximately 1.7 miles to the southeast) and Station 41 (2416 34th Avenue W –

³ Seattle Fire Department. 2016 Annual Report, 2017.

located approximately 1.5 miles to the south). Station 3 is located approximately 1.2 miles to the east of the site but is an unstaffed station that serves as the base of operations for the SFD's fireboats on the freshwater side of the Ballard Locks. Station 20 and Station 41 are each staffed by 4 personnel each day (1 supervisor and 3 firefighters) and each station maintains one fire engine onsite.⁴

The SFD has established a response time goal of four minutes (to be achievable 90% of the time) for the first engine company to arrive at the scene of a reported structure fire or Basic Life Service (BLS) medical emergency. Between 2012 and 2016, the SFD met this goal on 83% to 85% of those responses. The SFD also maintains a response time goal of eight minutes (to be achievable 90% of the time) to all ALS/EMS emergencies and met this goal on 85% to 89% of those responses between 2012 and 2016.⁴

Table 3.11-3 shows the historical incident response data for the SFD from 2012 to 2016, including responses to calls for fire protection and responses for EMS calls. As shown in the table, the majority of the incidents responded to by SFD were for EMS calls.

**Table 3.11-3
SUMMARY OF SFD RESPONSES: 2012 – 2016**

	2012	2013	2014	2015	2016
Fire	12,651	13,388	14,260	15,079	15,787
EMS	69,082	71,948	75,720	77,773	79,454
Total	81,733	85,336	89,980	92,852	95,241
% Change over Previous Year		4%	5%	3%	2%

Source: Seattle Fire Department, 2017.

More specifically, **Table 3.11-4** summarizes the historical incident responses for the closest stations to the Fort Lawton site (Station 20 and Station 41) over the last five years. Similar to the overall SFD, the majority of incidents responded to by Station 20 and Station 41 were for EMS calls.

⁴ Personal communication with Jay Hagen, Seattle Fire Department Assistant Chief – Operations Division. September 2017.

Table 3.11-4
SUMMARY OF SFD RESPONSES FOR STATION 20 AND STATION 41:
2012 – 2016

	2012		2013		2014		2015		2016	
	Station 20	Station 41	Station 20	Station 41	Station 20	Station 41	Station 20	Station 41	Station 20	Station 41
Fire	200	122	226	147	234	132	22	154	265	121
EMS	847	559	920	522	892	503	983	565	1,118	581
Total	1,047	681	1,146	669	1,795	635	1,005	719	1,383	702
% Change			9%	-2%	57%	-5%	-44%	13%	38%	-2%

Source: Seattle Fire Department, 2017.

Public Schools

The Fort Lawton site is located within the enrollment boundaries of Seattle Public Schools (SPS). SPS contains 99 schools at various grade levels, including 59 elementary schools (K-6), 11 K-8 schools, 10 middle schools, 12 high schools and 7 service schools. SPS serves a total student population of approximately 54,976 students and has a staff of approximately 6,371 personnel, approximately 4,810 of which are educators.⁵

The schools that are closest and would be anticipated to serve the Fort Lawton site include Lawton Elementary School (4000 27th Avenue W – located 0.7 mile east of the site), McClure Middle School (1915 1st Avenue W – located 2.7 miles east of the site) and Ballard High School (1418 NW 65th Street – located 1.7 miles northeast of the site). SPS anticipates opening Magnolia Elementary School and Lincoln High School in 2019, which are expected to help absorb demand in surrounding areas and could affect the boundaries of Lawton Elementary School and Ballard High School.

Table 3.11-5 summarizes the existing estimated right size capacity⁶ of the schools that currently serve the Fort Lawton site and vicinity.

Table 3.11-6 presents the enrollment for the schools that would serve the Fort Lawton site from 2012 – 2016. As noted in the table, enrollment at the schools has been relatively stable over the last five years. Lawton Elementary and McClure Middle School maintained enrollment levels that were below the right size capacity for each school, while Ballard High School had a higher enrollment than its right sized capacity as of 2016.

⁵ Seattle Public Schools. *Seattle Public Schools Website*
<http://www.seattleschools.org/cms/One.aspx?portalId=627&pageId=1529516>. September 2017.

⁶ Estimated right size capacity is the number of students that can be accommodated assuming appropriately sized and configured classrooms and space for preschools and other programs.

**Table 3.11-5
CAPACITY OF SCHOOLS THAT SERVE THE FORT LAWTON SITE**

	Estimated Right Size Capacity
Lawton Elementary	452 students
McClure Middle School	632 students
Ballard High School	1,607 students

Source: Seattle Public Schools, 2017.

**Table 3.11-6
SCHOOL ENROLLMENT IN FORT LAWTON VICINITY: 2012 – 2016**

	2012	2013	2014	2015	2016
Lawton Elementary	433	422	419	426	443
% Change		-3%	-1%	2%	4%
McClure MS	448	520	540	554	552
% Change		16%	4%	3%	-1%
Ballard HS	1,609	1,582	1,634	1,665	1,798
% Change		-2%	3%	2%	8%

Source: Seattle Public Schools, 2017.

SPS completed their most recent five-year enrollment projections in October 2016 to prepare for student enrollment changes and plan for future growth within the district. **Table 3.11-7** presents the five-year enrollment projections for each of the schools that are most proximate to the Fort Lawton site. Based on these five-year projections, Lawton Elementary would be over its right size capacity (452 students) in the 2020-21 school year, while both McClure Middle School (632 students) and Ballard High School (1,607 students) would be below their right size capacity. As mentioned previously, SPS anticipates opening Magnolia Elementary School and Lincoln High School in 2019, which are expected to help absorb demand in surrounding areas and affect the boundaries of Lawton Elementary School and Ballard High School.

**Table 3.11-7
ENROLLMENT PROJECTIONS FOR SCHOOLS IN THE FORT LAWTON
VICINITY: 2012 – 2016**

	2016-17	2017-18	2018-19	2019-20	2020-21	Change from 2016-21
Lawton Elementary	446	513	553	595	641	+195
% Change		-3%	-1%	2%	4%	
McClure MS	561	550	590	564	573	+12
% Change		16%	4%	3%	-1%	
Ballard HS	1,797	1,812	1,866	1,557	1,556	-241
% Change		-2%	3%	2%	8%	

Source: Seattle Public Schools, 2017.

As part of their planning process, SPS maintains data regarding the student yield rate for all students in grades K-12 in each part of Seattle for various types of housing (i.e., apartment, condominiums, single-family residences, etc.). The rate indicates the percentage of students that would be generated based on the number and type of housing unit. Within the McClure Middle School area (which would include the Fort Lawton site), the student yield rate for apartments is 2.3%, for condominiums the rate is 1.9% and for single-family residences the rate is 27.6%.

Talaris Site

Police Service

SPD provides police service to the Talaris site. The site is located within the service jurisdiction of the North Precinct, which is headquartered at 10049 College Way N (approximately 3.5 miles to the northwest of the site). The North Precinct is further divided into specific sectors and beats; the Talaris site is located within the University Sector and Beat 3 (U3).⁷

The North Precinct includes approximately 200 officers and approximately 62 vehicles that are used by officers during their work in the field. The minimum number of officers assigned to a given shift in the North Precinct is 25 officers, which occurs during 1st Watch (between 3 AM and 11 AM).¹

The Talaris site is located within the University District Micro Community Policing Plan area. Based on data collected from April 2017 through June 2017, the public safety priorities for the University District Micro Community Policing Plan area were car prowls, burglaries, property crime and homeless encampments.⁸

Table 3.11-8 presents the annual number of computer aided dispatch (CAD) events for the North Precinct over the past 5 years. From 2016 to 2012, the number of dispatched events for the West Precinct has increased by approximately 10%.

⁷ Personal communication with Alyssa Pulliam, Seattle Police Department Finance, Policy and Planning. September 2017.

⁸ Seattle Police Department. University District Micro Community Policing Plan. <https://www.seattle.gov/police/community-policing/what-spd-is-doing>. September 2017.

**Table 3.11-8
NORTH PRECINCT CAD EVENTS: 2012 – 2016**

	2012	2013	2014	2015	2016
CAD Events	99,030	104,523	100,312	102,657	108,996
% Change over Previous Year		6%	-4%	2%	6%

Source: Seattle Police Department, 2017.

More specifically, **Table 3.11-9** summarizes the annual calls for service over the last five years for the U3 Beat, which includes the Talaris site and vicinity. As noted in the table, there was a dramatic decrease in calls for service in 2013 and a sharp increase in calls for service in 2014 and 2015. Overall, calls for service have decreased within the U3 Beat by approximately 7% since 2012.

**Table 3.11-9
U3 BEAT CALLS FOR SERVICE: 2012 – 2016**

	2012	2013	2014	2015	2016
Calls for Service	5,527	728	1,804	4,167	5,113
% Change over Previous Year		-87%	148%	131%	23%

Source: Seattle Police Department, 2017.

Fire and Emergency Service

SFD provides fire service to the Talaris site. The closest SFD stations to the site are Fire Station 17 (1050 NE 50th Street – located approximately 1.4 miles to the northeast) and Station 38 (4004 NE 55th Street – located approximately 0.5 mile to the north). Station 17 houses one fire engine, one ladder truck, one battalion chief vehicle and one medic unit; the station is staffed by 11 personnel (two supervisors, six firefighters, two firefighter/paramedics and one battalion chief).⁹

Table 3.11-3 presents the historical incident response data for the SFD from 2012 to 2016, including responses to calls for fire protection and responses for EMS calls. More specifically, **Table 3.11-10** summarizes the historical incident responses for the stations that are closest to the Talaris site (Station 17 and Station 38). Similar to the overall SFD, the majority of the incidents that were responded to by Station 17 and Station 38 were for EMS calls.

⁹ Personal communication with Jay Hagen, Seattle Fire Department Assistant Chief – Operations Division. September 2017.

Table 3.11-10
SUMMARY OF SFD RESPONSES FOR STATION 17 AND STATION 38:
2012 – 2016

	2012		2013		2014		2015		2016	
	Station 17	Station 38	Station 17	Station 38	Station 17	Station 38	Station 17	Station 38	Station 17	Station 38
Fire	572	287	638	285	662	312	726	316	726	328
EMS	2,406	1,242	2,540	1,271	2,711	1,305	2,929	1,392	2,967	1,384
Total	2,978	1,529	3,178	1,556	3,373	1,617	3,655	1,708	3,693	1,712
% Change			9%	-2%	57%	-5%	-44%	13%	38%	-2%

Source: Seattle Fire Department, 2017.

Public Schools

The Talaris site is within the enrollment boundaries of SPS. The schools that are closest and are anticipated to serve the Talaris site include Laurelhurst Elementary School (4530 46th Avenue NE – located 0.3 mile to the northeast), Eckstein Middle School (3003 NE 75th Street – located 1.5 miles to the north) and Roosevelt High School (1410 NE 66th Street – located 1.6 miles to the northwest of the site). SPS also anticipates opening Lincoln High School in 2019, which could affect the boundaries of Roosevelt High School.

Table 3.11-11 summarizes the existing estimated right size capacity of the schools that currently serve the Talaris site and vicinity.

Table 3.11-11
CAPACITY OF SCHOOLS THAT SERVE THE TALARIS SITE

	Estimated Right Size Capacity
Laurelhurst Elementary	400 students
Eckstein Middle School	1,060 students
Roosevelt High School	1,715 students

Source: Seattle Public Schools, 2017.

Table 3.11-12 summarizes the enrollment for the schools that would serve the Talaris site from 2012 – 2016. As noted in the table, enrollment at the schools has been relatively stable over the last five years with the exception of 2014 for Eckstein Middle School which saw a 28% decrease in enrollment from the previous year. In 2016, Eckstein Middle School maintained enrollment that was below the right size capacity for the school, while

Laurelhurst Elementary and Roosevelt High School had an enrollment that was almost exactly at the right sized capacity for each school as of 2016.

**Table 3.11-12
SCHOOL ENROLLMENT IN TALARIS VICINITY: 2012 – 2016**

	2012	2013	2014	2015	2016
Laurelhurst Elementary % Change	410	427 4%	421 -1%	432 3%	403 -7%
Eckstein MS % Change	1,298	1,220 -6%	881 -28%	907 3%	980 8%
Roosevelt HS % Change	1,691	1,712 1%	1,695 -1%	1,689 -1%	1,715 2%

Source: Seattle Public Schools, 2017.

Table 3.11-13 presents the five-year enrollment projections for each of the schools that are most proximate to the Talaris site. Based on these projections, Eckstein Middle School would be over its right size capacity (1,060 students) in the 2020-21 school year, while both Laurelhurst Elementary (400 students) and Roosevelt High School (1,715 students) would be below their right size capacity. As mentioned previously, SPS anticipates opening Lincoln High School in 2019, which could affect the boundaries of Roosevelt High School.

**Table 3.11-13
ENROLLMENT PROJECTIONS FOR SCHOOLS IN THE TALARIS
VICINITY: 2012 – 2016**

	2016-17	2017-18	2018-19	2019-20	2020-21	Change from 2016-21
Laurelhurst Elementary % Change	416	397 -5%	391 -2%	375 -4%	365 -3%	-51
Eckstein MS % Change	955	961 1%	1,032 7%	1,106 7%	1,094 -1%	+139
Roosevelt HS % Change	1,713	1,813 6%	1,891 4%	1,418 -25%	1,487 5%	-226

Source: Seattle Public Schools, 2017.

As mentioned for the Fort Lawton site, as part of their planning process, SPS maintains data on the student yield rate for all students in grades K-12 in each part of Seattle for various types of housing. The rate indicates the percentage of students that would be generated based on the number and type of housing unit. Within the Eckstein Middle School area (which would include the Talaris site), the student yield rate for apartments is 5.9%, for condominiums the rate is 4.0% and for single-family residences the rate is 31.1%.

3.11.2 Impacts of the Alternatives

An analysis of the potential public services impacts of Alternative 1, the Applicant's Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant's Preferred Alternative)

Under Alternative 1, development would feature a mix of affordable housing on the Fort Lawton site, including affordable rental and ownership and formerly homeless housing. Approximately 238 housing units would be provided on the site. Public park uses would also be included. No development is assumed for the Talaris site.

Fort Lawton Site

Police Service

Construction

Construction activities associated with development under Alternative 1 could result in an increase in demand for police service due to potential construction site theft and/or vandalism. Potential construction-related increases in demand for police service would be temporary in nature and would cease once full buildout of the site is completed (assumed to occur in 2025). It is anticipated that the construction site would be secured with fencing for the duration of construction and that existing SPD staff would be sufficient to respond to any potential service calls resulting from construction activities. It is also possible that police staffing and resources would be needed at times for traffic management during construction activities.

Operation

Increases in the on-site population associated with the development of affordable housing and senior supportive housing under Alternative 1 would be incremental over the approximately seven-year buildout of the Fort Lawton site and would be accompanied by incremental increases in demand for police service. New park and recreation uses would also be anticipated to generate some increased demand for police service. SPD expects that call volumes could increase with development on the site; however, the exact number of incremental new calls cannot be quantified.¹⁰

¹⁰ Personal Communication with Alyssa Pulliam, Seattle Police Department Finance, Policy and Planning. September 2017.

There is some thought that affordable housing can result in potential increases in crime in the surrounding areas. However, there is no definitive evidence that this is the case, and several studies and literature do not support this conclusion. In a 2013 research paper, Michael Lens, a professor of Urban Planning at the University of California at Los Angeles, analyzed numerous studies, research and literature that have been conducted over the past 30 years in cities across the country on the subject of affordable housing and its effect on neighborhood crime. Nearly all the studies referenced conclude that there is little evidence that public or affordable housing attracts crime, and that there is little evidence for crime spillovers into surrounding neighborhoods. In particular, a 2003 study in Denver examined scattered/dispersed site public housing's effect on neighborhood crime and compared predicated and actual crime rates in neighborhoods with and without public housing. The 2003 study found no discernable impacts from dispersed public housing on crime rates in Denver. They also conducted focus groups where the consensus among participants was that public housing would bring down property values and increase crime. However, the quantitative analysis concluded that property values increased and that there was no increase in crime. Mr. Lens concluded that whether looking at larger public housing projects, vouchers or scattered-site public housing, the effects on neighborhood crime are typically quite small.¹¹

In addition, a 2016 nationwide analysis of affordable housing projects funded through the Low-Income Housing Tax Credit (LIHTC) program found that with few exceptions, low-income housing built in the nation's 20 least affordable housing markets had "no effect on home values." The study examined housing projects built over a 10-year period, including in the Seattle area. In particular, the report found that there is little cause for concern in cities where housing is either expensive or in short supply.¹²

Development of senior supportive housing under Alternative 1 would include the provision of a comprehensive package of services focused on residential stability and the well-being of residents, including case management services provided onsite by Catholic Community Services of Western Washington and residential counselors that would be available onsite 24 hours a day (see **Chapter 2** for details). These support services could reduce the need for police service.

While it is anticipated that new development and associated on-site population would result in an increase in police service calls, SPD expects that they would have the capacity to continue to meet the police service needs on the site and in the remainder of the city of Seattle. SPD does not anticipate that they would need to increase staffing levels or provide equipment upgrades as a result of the project, beyond the new staffing plan identified under Affected Environment (City of Seattle's approved plan for 200 new officers by 2020).¹⁰

¹¹ Michael C. Lens. *Subsidized Housing and Crime: Theory, Mechanisms and Evidence*. January 2013.

¹² Cheryl Young, *There Doesn't Go the Neighborhood: Low-Income Housing Has No Impact on Nearby Home Values*. November 2016.

Tax revenues generated directly and indirectly from development of the Fort Lawton site (including sales tax, retail sales tax, property tax, utility tax and other fees, licenses and permits) would be accrued and would help to offset the increased demands for police service. In addition, SPD would continue to identify and plan for the future needs of the department as part of the annual strategic planning and budgeting process. As a result, significant impacts to police service are not anticipated.

Fire and Emergency Service

Construction

During construction of the project under Alternative 1, SFD service calls would relate to inspection of specific construction projects onsite and to respond to potential construction-related fires, accidents and/or injuries. Site preparation and construction of new infrastructure and buildings could also increase the risk of a medical emergency or accidental fire that would require a response by SFD. Existing SFD staffing and equipment are expected to be sufficient to handle any increased service needed for on-site construction activities. Construction is also expected to result in additional traffic in the area and potentially temporary street closures that could affect fire and EMS responses over the short term. However, SFD indicates that this would not materially impact fire and EMS response.¹³

Operation

Increases in the on-site population under Alternative 1 would be incremental over the buildout of the Fort Lawton site and are anticipated to result in an increase in fire and EMS calls. New park and recreation uses (particularly active recreation uses such as the multi-purpose fields) are also anticipated to generate some increased demand for emergency services. SFD expects that call volumes could increase with development on the Fort Lawton site; however, the exact number of incremental new calls cannot be quantified.¹⁴

All new buildings would be constructed in compliance with the 2015 Seattle Fire Code, which is comprised of the 2015 International Fire Code with City of Seattle amendments. Adequate fire flow to serve the site would be provided as required by the 2015 Fire Code and specific requirements would be adhered to regarding emergency access to structures.

While it is anticipated that new development and associated on-site population would result in an increase in fire response and EMS calls, the SFD anticipates that they would have the staffing and equipment capacity to continue to meet the fire and emergency service needs on the site and in the remainder of the city of Seattle. SFD does not anticipate

¹³ Personal Communication with Jay Hagen, Seattle Fire Department Assistant Chief – Operations Division. September 2017.

¹⁴ Personal Communication with Jay Hagen, Seattle Fire Department Assistant Chief – Operations Division. September 2017.

that they would need to increase staffing levels or provide equipment upgrades as a result of development under Alternative 1.¹¹

Tax revenues generated from development of the Fort Lawton site would be accrued and would help to offset the increased demands for fire and emergency services. In addition, SFD would continue to identify and plan for the future needs of the department as part of the annual strategic planning and budgeting process. As a result, significant impacts to fire and emergency service are not anticipated.

Public Schools

As noted under Affected Environment, SPS does not have standard student generation rates but does maintain data regarding the student yield rate for all students in grades K-12 in each part of the city of Seattle for various types of housing. The rate indicates the percentage of students that would be generated based on the number and type of housing units. Within the McClure Middle School area (which would include the Fort Lawton site), the student yield rate for apartments is 2.3%, for condominiums is 1.9% and for single-family residences is 27.6%. These student yield rates have been used in conjunction with the number and types of housing units assumed under each of the EIS alternatives to determine approximate number of students that could be generated by development. For the purposes of this analysis, it is assumed that senior supportive housing units would not generate any students, and in order to provide a conservative analysis, it is assumed that all other residential units would be categorized as single-family residences since that type of housing typically generates the greatest number of students.

Operation

Table 3.11-14 summarizes the new students generated by development on the Fort Lawton site under each of the EIS alternatives based on the methodology described above. Under Alternative 1, development on the Fort Lawton site would generate approximately 41 new students.

**Table 3.11-14
FORECASTED STUDENT GENERATION FOR THE FORT LAWTON SITE –
ALTERNATIVES 1 - 4**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Total Students	41	31	0	0

Source: *Seattle Public Schools and City of Seattle, 2017.*

As noted in the Affected Environment discussion, based on SPS student enrollment projections, it is anticipated that Lawton Elementary would be over its right size capacity while both McClure Middle School and Ballard High School would be below their right size capacity during the 2020-2021 school year. It is not known which specific grade levels new

students under Alternative 1 would attend. McClure Middle School and Ballard High School would have adequate capacity to accommodate additional students generated by development under Alternative 1. However, elementary students added to Lawton Elementary would contribute to a school that is projected to be over its right size capacity. Increases in student population over the buildout period could be addressed as part of SPS's annual planning processes. SPS could adjust the attendance area boundaries, provide transportation service for these students and/or take other measures to accommodate the number of students in excess of the right size capacity. It should be noted that SPS anticipates that Magnolia Elementary and Lincoln High School would be operational by 2019, which is expected to help absorb demand in the surrounding area and could affect the boundaries and enrollment for Lawton Elementary and Ballard High School.

Talaris Site

Under Alternative 1, the Talaris site would not be redeveloped and no changes or impacts to public services are anticipated.

Alternative 2 – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

Under Alternative 2, the Fort Lawton site would be developed in market-rate single-family housing, and the development of affordable and formerly homeless housing would occur on the Talaris site. Approximately 113 market-rate houses would be developed on the Fort Lawton site and approximately 238 affordable housing units and associated community facilities would be developed on the Talaris site. No active or passive public park areas would be provided on the Fort Lawton or Talaris sites under Alternative 2.

Fort Lawton Site

Police Service

Construction

Construction activities associated with development under Alternative 2 could result in an increase in demand for police services due to potential construction site theft or vandalism. Potential construction-related increases in demand for police services are anticipated to be lower than under Alternative 1 since few residential units would be developed on the site and no park and recreation facilities would be constructed.

Operation

Increases in the on-site population associated with the development of market-rate single-family housing would be incremental over the approximately seven-year buildout of the Fort Lawton site and would be accompanied by incremental increases in demand for police

service. SPD anticipates that call volumes could increase with development on the Fort Lawton site; however, the exact number of incremental new calls cannot be quantified.¹⁵

While new development and associated on-site population would result in an associated increase in police service calls, it is anticipated that this increase would be less than under Alternative 1 due to fewer residential units and lower on-site population. SPD indicates that they would have the capacity to continue to meet the police service needs on the site and in the remainder of the city of Seattle and does not anticipate that they would need to increase staffing levels or provide equipment upgrades as a result of the project, beyond the new staffing plan identified under Affected Environment.¹²

Tax revenues generated from development of the Fort Lawton site under Alternative 2 would be accrued and would help to offset the increased demands for police services. In addition, SPD would continue to identify and plan for the future needs of the department as part of the annual strategic planning and budgeting process. As a result, significant impacts to police services are not anticipated.

Fire and Emergency Service

Construction

SFD service calls are anticipated to temporarily increase during construction under Alternative 2 and would be related to inspection of specific construction projects onsite and to respond to potential construction-related fires, accidents and/or injuries. Potential construction-related increases in demand for fire and emergency services are anticipated to be less than under Alternative 1 since fewer residential units would be developed on the site and no park and recreation facilities would be constructed.

Operation

Increases in the on-site population associated with the development of market-rate single-family residences under Alternative 2 would be incremental over the buildout of the Fort Lawton site and are anticipated to result in an associated increased in fire and EMS calls. SFD expects that call volumes could increase with development on the site; however, the exact number of incremental new calls cannot be quantified. It is anticipated that the increase in call volumes would be less than Alternative 1 since fewer residential units would be constructed on the site and no parks and recreation facilities would be provided. While it is anticipated that new development and on-site population would result in an associated increase in fire response and EMS calls, the SFD anticipates that they would have the staffing and equipment capacity to continue to meet the fire and emergency service needs on the site and in the remainder of the city of Seattle.¹⁶

¹⁵ Personal Communication with Alyssa Pulliam, Seattle Police Department Finance, Policy and Planning. September 2017.

¹⁶ Personal Communication with Jay Hagen, Seattle Fire Department Assistant Chief – Operations Division. September 2017.

As under Alternative 1, all new buildings would be constructed in compliance with the 2015 Seattle Fire Codes. Adequate fire flow to serve the site would be provided as required by the 2015 Fire Code and specific requirements would be adhered to regarding emergency access to structures.

Tax revenues generated from development of the Fort Lawton site would be accrued and would help to offset the increased demands for fire and emergency services. In addition, SFD would continue to identify and plan for the future needs of the department as part of the annual strategic planning and budgeting process. As a result, significant impacts to fire and emergency services would not be anticipated.

Public Schools

Development of market-rate single-family housing under Alternative 2 would generate new students from the Fort Lawton site. As noted in **Table 3.11-14**, development under Alternative 2 would generate approximately 31 new students, compared with 41 new students under Alternative 1. It is not known which specific grade levels new students would attend. Based on SPS student enrollment projections, it is anticipated that Lawton Elementary would be over its right size capacity while both McClure Middle School and Ballard High School would be below their right size capacity during the 2020-2021 school year. McClure Middle School and Ballard High School would have adequate capacity to accommodate additional students generated by development under Alternative 2. However, additional elementary students at Lawton Elementary would contribute to a school that is projected to be over its right size capacity. Increases in student population over the buildout period would be addressed as part of SPS's annual planning processes. SPS could adjust the attendance area boundaries, provide transportation service for these students and/or take other measures to accommodate the number of students in excess of the right size capacity. It should be noted that SPS anticipates that Magnolia Elementary and Lincoln High School would open by 2019, which is expected to help absorb demand in the surrounding area and could affect the boundaries and enrollment for Lawton Elementary and Ballard High School.

Talaris Site

Police Services

Construction

Construction activities associated with development of affordable and senior supportive housing on the Talaris site under Alternative 2 would be similar to those described for the Fort Lawton site under Alternative 1. Potential construction-related increases in demand for police services could include a temporary increase in demand for police services due to potential construction site theft or vandalism and would cease once full buildout of the site is completed. It is anticipated that the construction site would be secured with fencing for the duration of construction, and that existing SPD staff would be sufficient to respond to

any potential service calls resulting from construction activities. It is also possible that police staffing and resources would be needed at times for traffic management during construction activities.

Operation

Increases in the on-site population associated with the development of affordable and senior supportive housing would be incremental over the approximately seven-year buildout of the Talaris site and would be accompanied by incremental increases in demand for police service. Increases in demand for police services under Alternative 2 is anticipated to be similar to or less than at the Fort Lawton site under Alternative 1 since no parks and recreation facilities would be provided on the Talaris site. SPD expects that call volumes would increase with development on the Talaris site; however, the exact number of incremental new calls cannot be quantified. While call volumes are anticipated to increase, SPD expects that they would have the capacity to continue to meet the police service needs on the site and in the remainder of the city of Seattle. SPD does not anticipate that they would need to increase staffing levels or provide equipment upgrades as a result of the project, beyond the new staffing plan identified under Affected Environment.¹⁷

As described for the Fort Lawton site under Alternative 1, there is some thought that affordable housing can result in potential increases in crime in the surrounding areas. However, several studies and research literature have shown that the evidence indicates that whether looking at larger public housing projects, vouchers or scattered-site public housing, the effects on neighborhood crime are typically quite small.

Similar to the development of senior supportive housing under Alternative 1, development on the Talaris site under Alternative 2 would include the provision of a comprehensive package of services focused on residential stability and the well-being of residents, including case management services provided onsite by Catholic Community Services of Western Washington and residential counselors that would be available onsite 24 hours a day (see **Chapter 2** for details). These support services could reduce the need for police service.

Tax revenues generated from development on the Talaris site would be accrued and would help to offset the increased demands for police service. In addition, SPD would continue to identify and plan for the future needs of the department as part of the annual strategic planning and budgeting process. As a result, significant impacts to police services are not anticipated.

¹⁷ Personal Communication with Alyssa Pulliam, Seattle Police Department Finance, Policy and Planning. September 2017.

Fire and Emergency Services

Construction

During construction of affordable housing and senior supportive housing on the Talaris site under Alternative 2, it is anticipated that services calls to SFD would temporarily increase similar to Alternative 1 development on the Fort Lawton site. Existing SFD staffing and equipment are expected to be sufficient to handle any increased service needed for on-site construction activities. It is also possible that construction could result in additional traffic in the area with temporary street closures, which could temporarily affect fire and EMS responses. SFD indicates that this will not materially impact fire and EMS response.

Operation

Like development of the Fort Lawton site under Alternative 1, increases in the on-site population on the Talaris site under Alternative 2 would be incremental and are anticipated to result in an associated increase in fire and EMS calls. However, increased demand for fire and emergency services from the Talaris site under Alternative 2 would be less than from the Fort Lawton site under Alternative 1 since no new park and recreation uses would be provided. SFD expects that call volumes could increase with development on the Talaris site; however, the exact number of incremental new calls cannot be quantified. SFD anticipates that they would have the staffing and equipment capacity to continue to meet the fire and emergency service needs on the site and in the remainder of the city of Seattle. SFD does not anticipate that they would need to increase staffing levels or provide equipment upgrades as a result of the project.¹⁸

All new buildings would be constructed in compliance with the 2015 Seattle Fire Code. Adequate fire flow to serve the site would be provided as required by the 2015 Fire Code and specific requirements would be adhered to regarding emergency access to structures.

Tax revenues generated from development of the Talaris site would be accrued and would help to offset the increased demands for fire and emergency service. In addition, SFD would continue to identify and plan for the future needs of the department as part of the annual strategic planning and budgeting process. As a result, significant impacts to fire and emergency service are not anticipated.

Public Schools

As described previously, student yield rate data compiled by SPS is used to forecast the number of students that could be generated by development on the Talaris site. Within the Eckstein Middle School area (which includes the Talaris site), the student yield rate for apartments is 5.9%, for condominiums the rate is 4.0% and for single-family residences the rate is 31.1%. These student yield rates have been used in conjunction with the number and

¹⁸ Personal Communication with Jay Hagen, Seattle Fire Department Assistant Chief – Operations Division. September 2017.

types of housing units assumed under each of the EIS alternatives to determine approximate number of students that could be generated by development under the EIS alternatives. As described under Alternative 1, for the purposes of this analysis, it is assumed that senior supportive housing units would not generate any students, and in order to provide a conservative analysis, it is assumed that all other residential units would be categorized as single-family residences since that type of housing typically generates the greatest number of students.

Operation

Table 3.11-15 summarizes the new students that would be generated by development on the Talaris site under each of the EIS alternatives based on the methodology described above. Under Alternative 2, it is anticipated that development on the site would generate approximately 47 new students.

**Table 3.11-15
FORECASTED STUDENT GENERATION FOR THE TALARIS SITE –
ALTERNATIVES 1 - 4**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Total Students	0	47	47	0

Source: *Seattle Public Schools and City of Seattle, 2017.*

As noted in Affected Environment, based on SPS student enrollment projections for the 2020-2021 school year, Eckstein Middle School would be over its right size capacity while both Laurelhurst Elementary and Roosevelt High School would be below their right size capacity. While it is not known which specific grade levels potential new students would attend, Laurelhurst Elementary and Roosevelt High School would have adequate capacity to accommodate additional students generated by development under Alternative 2. However, additional students at Eckstein Middle School would be within the boundaries of a school that is projected to be over its right size capacity. Increases in student population over the buildout period could be addressed as part of SPS's annual planning processes. SPS could adjust the attendance area boundaries, provide transportation service for these students and/or take other measures to accommodate the number of students in excess of the right size capacity. However, these measures are limited without any immediate plans for construction of new middle school capacity within this area of the SPS service area. Since SPS has no new middle schools planned in the northeast Seattle area, the potential impacts on school service under Alternative 2 at the Talaris site would be greater than under Alternative 1 at the Fort Lawton site.

Alternative 3 - Public Park Onsite; Affordable/Homeless Housing Offsite

Under Alternative 3, the entire Fort Lawton site would be developed as a public park, including passive and active recreation areas. New affordable and formerly homeless housing would be developed on the Talaris site, including approximately 238 affordable housing units and associated community facilities.

Fort Lawton Site

Police Service

Construction

Construction activities for the public park under Alternative 3 could result in potential construction-related increases in demand for police service, including a temporary increase in demand for police service due to potential construction site theft or vandalism and would cease once full buildout of the site is completed. Due to the amount of development on the Fort Lawton under Alternative 3, is anticipated that temporary construction-related impacts to police services would be less than under Alternatives 1 or 2.

Operation

The operation of new park and recreation uses on the Fort Lawton site under Alternative 3 would generate some increased demand for police services. SPD expects that call volumes could increase with development on the Fort Lawton site; however, while the exact number of incremental new calls cannot be quantified it is anticipated that call volumes would be less than Alternatives 1 and 2 due to the amount of development on the site. SPD indicates that they would have the capacity to continue to meet the police service needs on the site and in the city of Seattle and do not anticipate that they would need to increase staffing levels or provide equipment upgrades as a result of the project, beyond the new staffing plan identified under Affected Environment.¹⁹

Fire and Emergency Service

Construction

Construction activities associated with the development of the public park could result in a temporary increase in demand for fire and emergency service associated with a potential construction-related medical emergency or accidental fire that would require a response by the SFD. However, it is anticipated that this temporary increase would be less than under Alternatives 1 and 2 due to the amount of development on the Fort Lawton site.

¹⁹ Personal Communication with Alyssa Pulliam, Seattle Police Department Finance, Policy and Planning. September 2017.

Operation

New park and recreation uses on the Fort Lawton site under Alternative 3 (particularly active recreation uses such as the three multi-purpose fields) would generate some increased demand for emergency services. Although the exact number of incremental new calls cannot be quantified, it is anticipated that the increase in demand would be lower than under Alternatives 1 and 2 due to less development on the site. SFD anticipates that they would have the staffing and equipment capacity to continue to meet the fire and emergency service needs on the site and in the remainder of the city of Seattle. SFD does not anticipate that they would need to increase staffing levels or provide equipment upgrades as a result of the project.²⁰

Public Schools

Under Alternative 3, the Fort Lawton site would be developed as a public park and no new residential units would be provided on the site. As a result, no new students would be generated by development under Alternative 3 and no impacts to public school service are anticipated.

Talaris Site

Alternative 3 assumes the same level of residential development on the Talaris site as described under Alternative 2, including the same mix of affordable housing and senior supportive housing. As a result, impacts to public services from development on the Talaris site under Alternative 3 would be the same as under Alternative 2.

Alternative 4 – No Action Alternative

Under Alternative 4 and no redevelopment would occur on the Fort Lawton or Talaris sites at this time. Both sites would remain in their existing conditions and no impacts to public services would result.

3.11.3 Mitigation Measures

The following measures have been identified to address the potential public services impacts from construction and operation of the Fort Lawton Project under Alternatives 1, 2 and 3. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

²⁰ Personal Communication with Jay Hagen, Seattle Fire Department Assistant Chief – Operations Division. September 2017.

Legally-Required Measures

- All new buildings would be constructed in compliance with the 2015 Seattle Fire Code, which is comprised of the 2015 International Fire Code with City of Seattle amendments.
- Adequate fire flow to serve development under the EIS alternatives would be provided as required by the 2015 Fire Code and specific requirements would be adhered to regarding emergency access to structures.

Measures Proposed as Part of Project

- The portions of the site that are under construction during phased development of the site would be fenced and lit, and could be monitored by surveillance cameras to help prevent construction site theft and vandalism.
- A portion of the tax revenues directly and indirectly generated from development under the EIS alternatives – including construction sales tax, retail sales tax, property tax, utility tax and other fees, licenses and permits - would accrue to the City of Seattle and could help offset demand for public services.
- Increases in student population over the buildout period would be addressed through SPS's planning processes. SPS could take any or a combination of the following actions to match capacity and enrollment under the EIS alternatives:
 - Providing transportation service to schools with capacity;
 - Adding, relocating or removing programs;
 - Adjusting school boundaries;
 - Adjusting geographic zones for option schools;
 - Adding or removing portables;
 - Adding to or renovating buildings; and/or
 - Opening, reconstituting or closing buildings.

Other Possible Measures

- King County Metro could provide shuttle service between the Fort Lawton Project and downtown to enhance residents' access to services and employment opportunities.
- Van service could be provided as part of the project for senior supportive housing and possibly for the other affordable housing onsite to enhance access to services and employment opportunities.

3.11.4 Significant Unavoidable Adverse Impacts

Alternatives 1, 2 and 3 would increase demand for school service, including at schools that are projected to be over capacity with or without the project (e.g., Lawton Elementary School in the Fort Lawton vicinity and Eckstein Middle School in the Talaris vicinity). This impact on school service would be greater under Alternatives 2 and 3 at the Talaris site, as SPS does not have plans for a new middle school in the northeast Seattle area, whereas in the service area at the Fort Lawton site there are immediate plans to add new elementary capacity, as well as new high school capacity. Although general growth-related pressures on schools are difficult to predict further into the future, SPS is expected to take measures to address capacity issues, including provide transportation service, adjust attendance area boundaries or add portables. As a result, no significant unavoidable adverse schools or other public services impacts are anticipated.

3.12 UTILITIES

This section describes the utilities on and near the Fort Lawton and Talaris sites. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures are identified. The section was prepared by MIG|SvR in December 2017.

Key Findings

Under existing conditions, there is no demand for potable water and sewage service at the Fort Lawton site and low demand at the Talaris site. Potable water and sewage service is currently provided by Seattle Public Utilities (SPU) at both sites; there are no known capacity constraints. Both sites have an existing stormwater distribution system, but no water quality treatment or flow control facilities are located at either site. Approximately 55% of the Fort Lawton site and 30% of the Talaris site is currently impervious surface.

During construction of Alternative 1, 2 or 3, stormwater could be impacted by erosion, sedimentation or pollutants. A temporary stormwater control system and Best Management Practices (BMPs) would minimize potential impacts. With development on the Fort Lawton site, Alternatives 1, 2, and 3 would reduce impervious surface coverage by approximately 15%, 10% and 20%, respectively. With development on the Talaris site, Alternatives 2 and 3 would increase impervious surfaces by approximately 20%.

Alternatives 1 and 2 on the Fort Lawton site would increase sewage flows to 41,720 and 39,550 gallons per day (gpd), respectively. Alternatives 2 and 3 on the Talaris site would both increase sewage flows to 41,720 gpd. Increases in potable water demand would be approximately equivalent to the increases in sewage flow. Although Alternative 3 does not include residential units, potable water demand could increase depending on irrigation needs for the multi-purpose fields.

Methodology

Information for the utilities analysis is from available City of Seattle GIS documentation and previous environmental documents including:

- U.S. Army Corps *Final Environmental Assessment for BRAX 05 Recommendations for Closure, Disposal, and Reuse of Fort Lawton, United States Army Reserve Center* (FACID WA030, WA031, WA012), Seattle, Washington (2012);
- City of Seattle *Talaris Environmental (SEPA) Checklist* (2008); and
- Triad Associates *4000P Preliminary Plat Drainage Report No 10-158* (2013).

Stormwater regulation is per the Seattle Stormwater Code (SMC 22.800) and the associated guidance in the *2016 City of Seattle Stormwater Manual*. These documents identify code regulations in compliance with the Phase I National Pollutant Discharge Elimination System

(NPDES) permit and provide guidance for the application and design of stormwater BMPs and infrastructure facilities. Regulations and design standards for sewer and water systems are per King County Health Department and City of Seattle.

3.12.1 Affected Environment

This sub-section describes existing utilities on and near the Fort Lawton and Talaris sites, including stormwater, sewer and water.

Fort Lawton Site

The approximately 34-acre Fort Lawton site includes several existing buildings, surface parking and infrastructure that were part of the former U.S. Army Reserve Center. City documentation indicates that existing on-site utilities were installed between the 1920s and the late 1990s.

Stormwater

Approximately 55% of the site is currently impervious surface, including building footprints, surface parking and roadways (see **Table 2-1** in **Chapter 2** for details). The asphalt-surfaced Texas Way W crosses northwest/southeast across the site with pedestrian access provided by an adjacent cement concrete sidewalk. Additional site circulation is provided by smaller site access roads that connect between parking lots, building sites and Texas Way W. Surface water is collected in storm drainage structures at site parking lots, in catch basins along Texas Way W and in roadside ditches where formal curb and gutter are not present. These flows are conveyed to two mains that run north/south across the property.

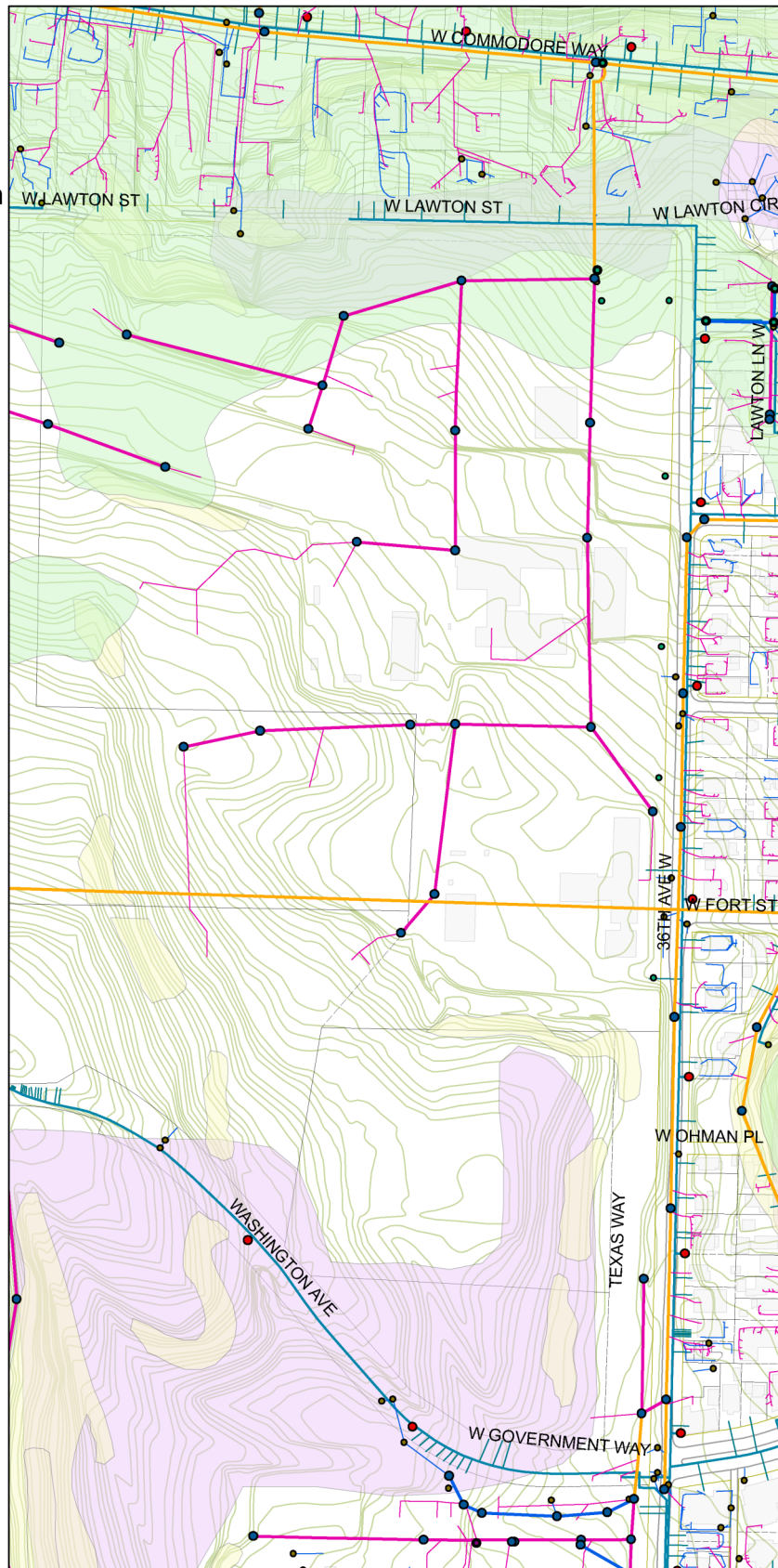
A 12-inch stormwater line that runs north/south along the east edge of the property and an 8-inch stormwater line that runs north/south through the center of the property convey stormwater from the site. These two conveyance lines connect at a 5-foot diameter stand pipe where a single storm line carries stormwater from the site northward to the 144-inch King County Metro Main where stormwater is then conveyed to King County's West Point Sewage Treatment Plant in Discovery Park for treatment and discharge to Shilshole Bay (see **Figure 3.12-1**, Fort Lawton Existing Utilities). The existing stormwater distribution system at the Fort Lawton site is federal government-owned (U.S. Army) and drains into King County's combined stormwater and sewer trunk line in Commodore Way W to the north of the Fort Lawton site. No water quality treatment or flow control facilities are provided onsite. Surface water is collected along roadside ditches or by stormwater catch basins.

Previous flooding has been reported at a residence downstream of the site. This flooding has been addressed.

Fort Lawton Army Reserve Center Redevelopment Project Draft Environmental Impact Statement

Legend

- drainagemh
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- cbasin
- outfall
- dwu main line**
 - Combined
 - Drainage
 - Sanitary
- dwu laterals**
 - Combined
 - Drainage
 - Sanitary
- hydrant
- wtrln
- wtrsvc
- ▭ Parcels
- bldg
- contour2



Note: This figure is not to scale

Source: SVR Design, 2017.

Figure 3.12-1
Fort Lawton Existing Utilities

Sewer

The existing sewer distribution system onsite is Army-owned and was installed in the early 1940s. Treatment for these sewage flows is performed at the King County West Point Sewage Treatment Plant. The site is currently vacant and there is no existing demand for sewer service.

The site includes a network of 8-inch sewer lines that convey sewage flows northward. The flows are discharged to the 144-inch King County Metro Main which carries flows to King County's West Point Sewage Treatment Plant. There are no known capacity constraints in the sewer mains near the site (see **Figure 3.12-1**, Fort Lawton Existing Utilities).

Water

Existing water service to the Fort Lawton site is provided by SPU. The water infrastructure on the site includes cast iron pipes from the 1920s, asbestos cement pipe from the 1950s and ductile iron pipe installed more recently in 1999. The site is currently vacant and there is no existing demand for potable water. SPU owns and operates more than 1,680 miles of water mains, eight reservoirs, sixteen pump stations, 18,920 fire hydrants and more than 188,000 service lines to serve 1.3 million regional customers.¹ The SPU *2013 Water System Plan* was prepared to ensure that SPU can meet the current and future demands for potable water as development continues in the region. It includes consumption rates, water conservation reports, planned infrastructure and operational improvements and SPU's guiding policies.

The site water connection is at the SPU-owned 8-inch main line (main) along 36th Avenue W at W Government Way. An existing 8-inch combination meter at the main, near W Fort Street, supplies a dead end 12-inch and 8-inch trunk-and-branch on-site water system and 12-inch on-site pumping station. Existing building-domestic and fire suppression systems are connected to the on-site system, including the 50,000-square foot Veterans Administration Building and the irrigation system for the 90,000-square foot Fort Lawton Cemetery offsite. There are approximately 10 fire hydrants onsite.

The 8-inch water main serving the Fort Lawton site has an estimated capacity of 1,250 gallons per minute (gpm) under fire demand condition. SPU maintains a distribution water main, with system capacity of 1,890 gpm in 40th Avenue E, about 300 feet west of the west boundary of the Fort Lawton site (see **Figure 3.12-1**, Fort Lawton Existing Utilities).

¹ Seattle Public Utilities *2013 Water System Plan*.

Talaris Site

The approximately 18-acre Talaris site includes several existing buildings, surface parking and infrastructure that are part of the Talaris conference center.

Stormwater

Approximately 30% of the site is currently in impervious surfaces, including building footprints, pathways and surface parking. Stormwater facilities on the Talaris site were installed in the early 1960s. No water quality treatment or flow control facilities are provided onsite. A 72-inch stormwater main traverses southwest across the site, conveying upstream flows from the Laurelhurst and Sandpoint neighborhoods, and the waters of Yesler Creek, to the 72-inch main in 38th Avenue NE.

Site surface water and groundwater is collected by stormwater catch basins and foundations drains and conveyed through 6-inch, 8-inch and 10-inch distribution lines to the 72-inch main. A 60-inch line captures overflow from the manmade pond in the center of the site and conveys the flows to a connection at the main at NE 41st Street. All site and upstream stormwater flows, including the waters of Yesler Creek, are ultimately conveyed across the Union Bay Natural Area and then discharged through an existing outfall into the Lake Washington Plant (see **Figure 3.12-2**, Talaris Existing Utilities).

Sewer

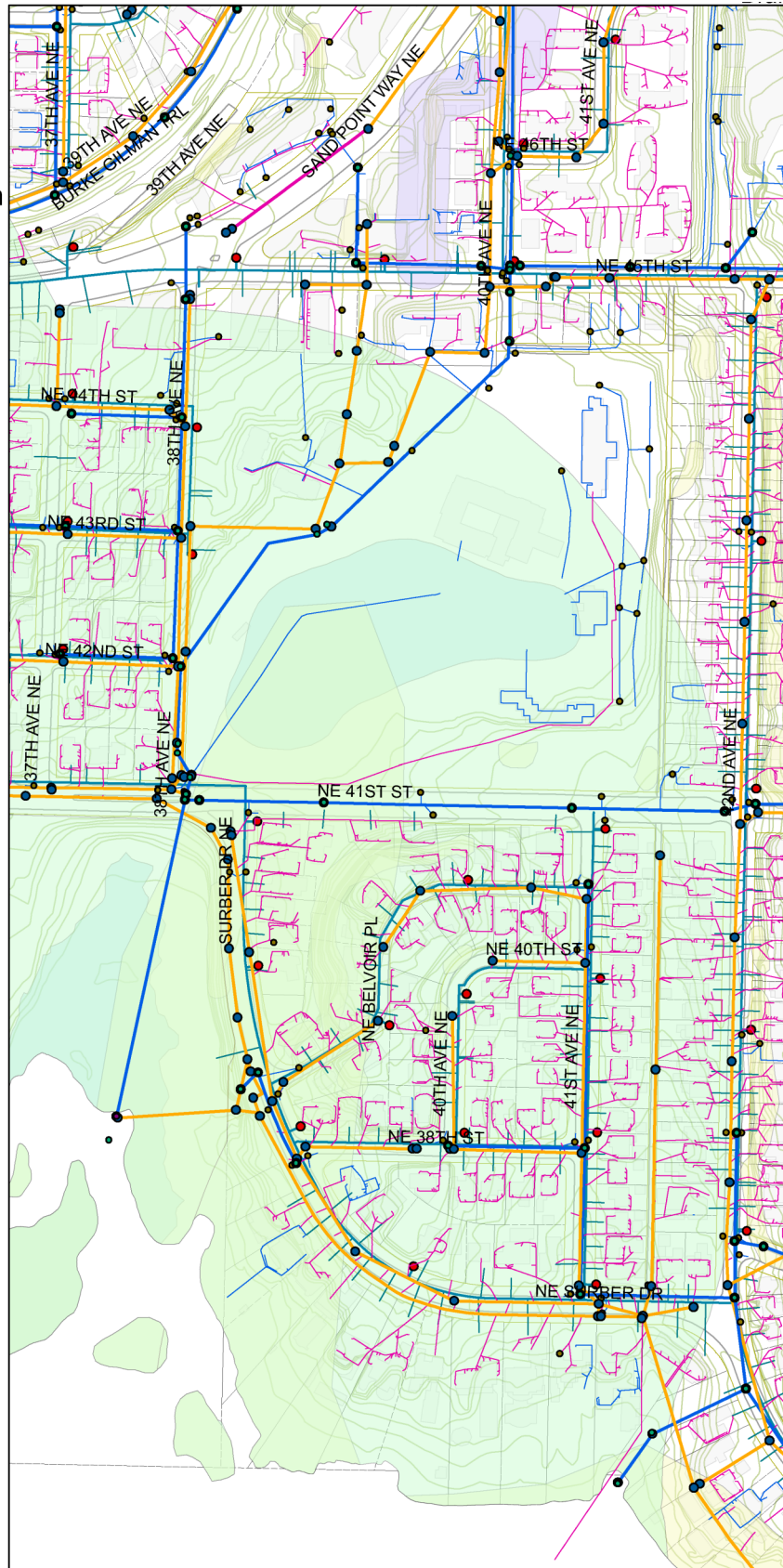
Existing sewer service to the site is provided by SPU. Sewer mains on the Talaris site were installed in the late 1940s. Due to the low density of on-site development, the existing sewer demand is low. A 30-inch sewer main and an 8-inch sewer line cross the northwest corner of the site and convey sewage flows from the upstream Laurelhurst and Sandpoint neighborhoods. These two sewer lines connect at an existing manhole located onsite. From this manhole, sewage flows are conveyed westward in the a 30-inch main onsite to the 30-inch main in 38th Avenue NE. There are no known capacity constraints in the sewer mains near the site.

A 30-inch sewer line serves the site's central building, and 4-inch and 6-inch lines serve the smaller buildings. City sewer cards indicate that sanitary flows from the site's "lodge" in the northwest part of the site are conveyed southward through a 6-inch/8-inch side sewer along the south edge of the site before connecting into the main within 38th Avenue NE, immediately north of MH 025-024. The remainder of the site's sewage flows are conveyed to the 30-inch main onsite before being conveyed to the main in 38th Avenue NE (see **Figure 3.12-2**, Talaris Existing Utilities).

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Legend

- drainagemh
- outfall
- dwumh
- cbasin
- outfall
- dwu main line**
 - Combined
 - Drainage
 - Sanitary
- dwu laterals**
 - Combined
 - Drainage
 - Sanitary
- hydrant
- wtrln
- wtrsvc
- ▭ Parcels
- bldg
- contour2



Note: This figure is not to scale

Source: SVR Design, 2017.

Figure 3.12-2
Talaris Existing Utilities

Water

Existing water service to the site is provided by SPU. The site is served by two water mains, an 8-inch dead end distribution water main that terminates on the southeast corner of 41st Avenue NE and NE 41st Street and an 8-inch dead end lobe of the distribution system that is fed from a connection at 36th Avenue NE and NE 45th Street. The 8-inch dead end distribution main terminating at 41st Avenue NE and NE 41st Street was installed in the 1920s and has an estimated system capacity of just over 1,500 gpm. This water main serves two existing hydrants along 38th Avenue NE and a 6-inch domestic water line at the south side of the site. There are no on-site fire lines, so the hydrants are considered to have impaired access. The 8-inch dead end lobe installed in the mid-1960s serves the three water service lines along the west frontage of 38th Avenue NE (two 4-inch water service lines and one 6-inch fire service). There are no known capacity constraints in the water mains near the site (see **Figure 3.12-2**, Talaris Existing Utilities).

3.12.2 Impacts of the Alternatives

An analysis of the potential utility impacts of Alternative 1, the Applicant's Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant's Preferred Alternative)

Under Alternative 1, development would feature a mix of affordable housing and public park uses on the Fort Lawton site. No development would occur on the Talaris site.

Fort Lawton Site

Stormwater

Grading activities on the Fort Lawton site for proposed redevelopment under Alternative 1 would include both cut and fill (see Section 3.1, **Earth**, for details). Construction activities could result in temporary impacts to stormwater runoff. Erosion and sedimentation as well as pollutants from construction equipment and vehicles could impact stormwater. A temporary stormwater control system and construction BMPs would be implemented that would address these potential impacts.

Development under Alternative 1 would include installation of new buildings, roadways, sidewalks, surface parking and driveways at the Fort Lawton site. The development would include transfer of land and existing easements from U.S. Army ownership to City of Seattle ownership. The project includes identifying responsibility for maintenance of any newly established public right of ways and associated utility and surface improvements. The City of Seattle Department of Transportation (SDOT) and SPU would be included in this process.

Approximately 40% of the site would be covered in impervious surfaces at project buildout, roughly 15% less than under existing conditions (see **Table 2-1** in **Chapter 2** for details). A permanent stormwater control system would be installed to manage stormwater runoff from these impervious surfaces. This system would include additional drainage and conveyance facilities to capture surface water runoff. In accordance with the requirements of the Seattle Stormwater Code, these improvements would trigger on-site stormwater management BMPs and detention/retention to meet the peak flow control standard. The facilities could include elements such as stormwater lines, catch basins, manholes, vaults, raingardens, bioretention facilities, dispersal trenches and/or underdrain systems. No significant stormwater impacts are expected.

Sewer

SPU would continue to provide sewer service to the Fort Lawton site under Alternative 1. Proposed development would increase the sewage flows discharging from the site to the sewer system to approximately 41,720 gpd². Under Alternative 1, the existing 8-inch sewer line that conveys flows to the 144-inch King County sewer main would be video-taped and rehabilitated, or replaced. New distribution pipes would be installed to convey sewer flows to the existing 8-inch connection per applicable City standards and conveyance needs. Any additional flows conveyed to the SPU combined sewer in 36th Avenue W could require modeling of downstream impacts. No significant sewer impacts are expected.

Water

SPU would continue to provide water service to the Fort Lawton site under Alternative 1, including to the Veterans Administration Building and Fort Lawton Cemetery offsite. Proposed development would increase potable water demand to the site to approximately 41,720 gallons per day. Additional water would be required for irrigation for parks areas during dry weather.

The existing potable water connection at 36th Avenue W and W Government Way would be maintained, with modifications to the existing distribution line. Any development, lot boundary adjustments or new parcel creation would require an approved Water Availability Certificate issued by SPU. SPU policies for water system designs typically require that developments and/or reconfigurations of this size provide developer installed SPU-owned facilities. Individual fire/domestic services would be required for new structures and facilities. If the existing dead-end water supply cannot meet required service levels, the development may require the installation of a looped system drawing from a second water main. No significant water impacts are expected.

² Water usage (and sewer flow) demand from the EIS alternatives is based on 70 gallons per day per person and the population estimates in Section 3.13, **Housing and Socioeconomics**.

Talaris Site

Under Alternative 1, no development is proposed on the Talaris site and utilities would remain as under existing conditions.

Alternative 2 – Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

Under Alternative 2, market-rate single-family housing would be constructed on the Fort Lawton site, and a mix of affordable housing on the Talaris site.

Fort Lawton Site

Stormwater

Similar to Alternative 1, construction activities for Alternative 2 could result in temporary impacts to surface water runoff from erosion and sedimentation as well as pollutants from construction equipment and vehicles. A temporary stormwater control system and construction BMPs would be implemented to address these potential impacts.

Development under Alternative 2 would include installation of new buildings, roadways, sidewalks and private driveways at the Fort Lawton site. The development would include transfer of land from U.S. Army ownership to City of Seattle ownership. The project would include identifying responsibility for maintenance of any newly established public right of ways and associated utility and surface improvements. The SDOT and SPU would be included in this process. Approximately 45% of the site would be covered in impervious surfaces at project buildout, roughly 10% less than under existing conditions and 5% more than Alternative 1 (see **Table 2-1** in **Chapter 2** for details). A permanent stormwater control system would be installed to manage stormwater runoff from these impervious surfaces, similar to under Alternative 1. This system would meet the requirements of the Seattle Stormwater Code. On-site stormwater management BMPs and detention/retention to meet the peak flow control standard would be implemented. No significant stormwater impacts are expected.

Sewer

SPU would continue to provide sewer service to the Fort Lawton site under Alternative 2. The proposed development would increase the sewage flows discharging from the site to the sanitary sewer system to approximately 39,550 gpd. Like under Alternative 1, the existing 8-inch sanitary sewer line would be video-taped and rehabilitated, or replaced. New distribution pipes would be installed to convey sewer flows to the existing 8-inch connection, per applicable City standards and conveyance needs. Any additional flows conveyed to the SPU combined sewer in 36th Avenue W could require modeling of downstream impacts. No significant sewer-related impacts are expected.

Water

SPU would continue to provide water service to the site under Alternative 2. Development under Alternative 2 would increase potable water demand from the site to 39,550 gpd. The existing potable water connection at 36th Avenue W and W Government Way would be maintained, with modifications to the existing distribution line. No significant water impacts are expected.

Talaris Site

Stormwater

Construction activities for Alternative 2 could result in temporary impacts to surface water runoff from erosion and sedimentation as well as pollutants from construction equipment and vehicles at the Talaris site. A temporary stormwater control system and construction BMPs would be implemented to address these potential impacts.

Development under Alternative 2 would include installation of new buildings, roadways, sidewalks, surface parking and private driveways at the Talaris site. The development would include the sale of privately held land to City of Seattle ownership. Any newly established public right of ways and associated utility and surface improvements would be maintained by SDOT and SPU, respectively. The existing SPU facilities on the site would remain under the ownership and maintenance authority of SPU. Approximately 50% of the site would be covered in impervious surfaces at project buildout, roughly 20% more than under existing conditions. A permanent stormwater control system would be installed to manage the stormwater runoff from these impervious surfaces. With on-site stormwater management BMPs and detention/retention to meet the pre-developed conditions per the Seattle Stormwater Code, there is no indication that the existing stormwater system is capacity constrained. Water quality treatment would be provided. No significant stormwater impacts are expected.

Sewer

SPU would continue to provide sewer service to the Talaris site under Alternative 2. Proposed development would increase the sewage flows discharging from the site to the sanitary sewer system to approximately 41,720 gpd. The proposed development would likely require rehabilitation or replacement of the existing 8-inch side sewer lines, and construction of additional sewer facilities onsite. New distribution pipes would be designed to convey sewer flows per applicable City standards and the added demand. The existing SPU facilities onsite would remain under the ownership and maintenance authority of SPU. No significant sewer impacts are expected.

Water

SPU would continue to provide water service to the Talaris site under Alternative 2. Proposed development would increase potable water demand to the site to approximately 41,720 gpd. The existing connections at 38th Avenue NE and NE 41st Street would be

maintained. Alternatively, they would be retired and new water and fire distribution lines would be installed, as needed, to serve site development and the increased potable water demand. SPU fire/domestic services would be required for new buildings. The layout of site roadways and building units would guide the requirements for water mains, hydrants and water services, including the removal and relocation of existing facilities. A requirement to supply a site this large with a looped water system, supplied from two independent sources, is typical. Any development, lot boundary adjustments or new parcel creation would require an approved Water Availability Certificate issued by SPU. No significant water impacts are expected.

Alternative 3 - Public Park Onsite; Affordable/Homeless Housing Offsite

Under Alternative 3, the Fort Lawton site would be developed as public parks and the Talaris site would be developed as affordable housing.

Fort Lawton Site

Stormwater

Similar to under Alternative 1, construction activities for Alternative 3 could result in temporary impacts to surface water runoff from erosion and sedimentation as well as pollutants from construction equipment and vehicles at the Fort Lawton site. A temporary stormwater control system and construction BMPs would be implemented to address these potential impacts

Development under Alternative 3 would maintain the existing OMS – Building 245 and associated parking. Other pavement and buildings would be removed resulting in a reduction of the existing impervious surfaces to less than 30% of the site (see **Table 2-1** in **Chapter 2** for details). Earthmoving activities and the addition of pedestrian pavement for site circulation would trigger on-site stormwater management BMPs and flow control. The existing stormwater conveyance system would be maintained with facilities rehabilitated, as needed. No significant stormwater impacts are expected.

Sewer

SPU would continue to provide sewer service to the site under Alternative 3. There would be no additional demand for sewer service because all the existing buildings on the Fort Lawton site would be demolished and removed except OMS - Building 245. No alterations to the existing sanitary sewer system would be required and no significant sewer impacts are expected.

Water

SPU would continue to provide water service to the site under Alternative 3. Potable water use under Alternative 3 would depend on the irrigation demand for the parks uses. Although assumed to be generally less than under Alternatives 1 and 2, water demand under Alternative 3 could be comparable to Alternative 2 during dry months when

irrigation would be needed. SPU policies for water system designs typically require that developments and/or reconfigurations of this size provide developer-installed SPU-owned facilities. SPU fire/domestic services would be required for new buildings. Removal of existing structures, realignment of existing roadways, or the incompatibility of water main corridors could require relocating and replacing on-site water mains. If required service levels cannot be satisfied with the existing dead-end water supply, then a looped system drawing from an additional second source of supply could be required. No alterations to the existing potable water system would be required and no significant water impacts are expected.

Talaris Site

Under Alternative 3, the same development would occur on the Talaris site as under Alternative 2 and potential utility impacts during construction and operation would also be the same.

Alternative 4 – No Action Alternative

Under Alternative 4, no redevelopment on the Fort Lawton or Talaris sites would occur at this time. The Fort Lawton site would remain in its existing vacant condition and the Talaris site would remain in its existing conference center use. There would be no additional demand for stormwater, sewer or water services and there would be no impacts on these utilities.

3.1.3 Mitigation Measures

The following measures have been identified to address the potential impacts on utilities from construction and operation of the Fort Lawton Project under Alternatives 1, 2 and 3. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

Legally-Required Measures

- Construction would be conducted in accordance with the conditions of all applicable permits issued by regulatory agencies (e.g., City of Seattle, Department of Fish and Wildlife and Department of Ecology).
- A Construction Stormwater Erosion Control Plan (CSECP) would be developed and implemented to cover all areas of the contractor's work including off-site areas such as

disposal sites, haul roads, all nearby property, streams and other bodies of water, including:

- Waste materials would be transported offsite and disposed of in accordance with applicable regulations and as noted in the CSECP.
- Construction entrances, wheel washes, street cleaning and other BMPs would be used to prevent tracking of soils beyond the project limits.
- Stormwater from work areas would be kept separate from non-work areas.
- The locations of existing inlets and catch basins would be identified in the CSECP and the method of protection would be described.
- Descriptions of locations, protections and covering practices for stockpiles would be provided.
- Controls to prevent sediment, debris and other pollutants from entering surface waters and drainage features would be provided.

Measures Proposed as Part of Project

- A Spill Plan (SP) would be developed and implemented to ensure that all pollutants and products are controlled and contained.
- BMPs for concrete work would include the following:
 - Cement trucks wash water would not be disposed of onsite but would be returned to the off-site batch plant for recycling as process water; and
 - New concrete work would be covered and protected from rainfall until cured.
- The use of unsealed external copper and galvanized metal would be prohibited except where required by Code as necessary for public safety or where no feasible alternative exists.
- BMPs would be implemented to ensure that no foreign material such as oil or fuel from construction equipment enters surface waters and that sedimentation is minimized.
- Adequate material and procedures to respond to unanticipated weather conditions or accidental release of materials would be available onsite.
- Contract documents would specify that equipment used for this project would be free of external petroleum-based products while work is performed around any water resources.
- Equipment staging or materials storage would be restricted to existing unvegetated surfaces.
- Inspections of the erosion control measures would be conducted throughout the construction period. This would ensure the effectiveness of the measures and determine any need for maintenance, repairs, or additional measures.
- Disturbance would be limited to those areas necessary for construction, which would be identified in on-site plans and marked on the site before construction begins.

- Stormwater runoff from new roads, surface parking, and other possible contaminant sources would be collected in on-site facilities to provide water quality treatment (Talaris Site) or flow control (Fort Lawton), as needed. These facilities could include elements such as pipes, catch basins, manholes, vaults, raingardens, bioretention facilities, dispersal trenches or underdrain systems.

Other Possible Measures

- Measures to control any impacts of excavation dewatering on groundwater could include: site-specific design and careful control of dewatering systems, minimizing the extent and duration of dewatering, and infiltration of extracted groundwater (see **Appendix B** for details).

3.1.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse utility impacts are expected.

3.13 HOUSING AND SOCIOECONOMICS

This section of the DEIS describes the housing and socioeconomic conditions on and near the Fort Lawton and Talaris sites. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified.

Key Findings

The Fort Lawton site is presently vacant and contains no residences, population or full-time employment, beyond employees associated with the basic upkeep and security of the site. The Talaris site is presently a conference center with lodging and open space that is available to rent for events and meetings, with no permanent residences on site. Both the Fort Lawton vicinity and Talaris vicinity are less economically diverse and contain fewer minorities compared to the overall percentages in the city of Seattle. Census Tract 57 in the Fort Lawton vicinity and the Talaris vicinity median household incomes are above the Seattle median household income.

At the Fort Lawton site, Alternative 1 would increase residential density; add 238 affordable housing units, including units for people who formerly experienced homelessness; increase the population to 596 people; align with the City's plan for increased housing supply to accommodate the City's share of King County's projected twenty-year growth; and help address the City's goal of making it possible for households of all income levels to live affordably in Seattle. With proposed development, shares of the population in the Fort Lawton vicinity by age, ethnicity and income levels are anticipated to shift towards ratios more consistent with those citywide. No significant housing or socioeconomic impacts are expected. No housing would be built on the Talaris site under Alternative 1.

At the Fort Lawton site, Alternative 2 would add 113 market-rate housing units to the Fort Lawton site, increase residential density (although less than under Alternative 1), increase the population at the site to from 0 to 565,¹ and align with the City's plan for increased housing supply. This alternative would not help address the City's goal of making it possible for households of all income levels to live affordably in Seattle. With proposed development, shares of the population in the Fort Lawton vicinity by age, ethnicity and income levels are anticipated to remain relatively the same. No significant housing or socioeconomic impacts are expected. Development at the Talaris site under Alternative 2 would result in impacts like those described under Alternative 1 at the Fort Lawton site.

No housing would be built on the Fort Lawton site under Alternative 3. Housing and socioeconomic conditions in the Fort Lawton vicinity would remain as under existing

¹ This conservatively assumes an average household size for the market-rate housing of 5, although the average household size for owner-occupied housing units in Seattle is 2.39 (2011-2015 American Community Survey).

conditions. Development at the Talaris site under Alternative 3 would result in impacts like those described under Alternative 1 at the Fort Lawton site.

Methodology

Information and analysis in this section is largely based on U.S. Census data (2011-2015, American Community Survey, 5-year estimates), real estate data and studies and review of the *Seattle 2035 Comprehensive Plan*.

Economic factors are not listed as elements of the environment to be addressed through SEPA in WAC 197-11-444. SEPA contemplates that general social welfare, economic and other requirements and considerations of state policy will be accounted for when weighing and balancing decisions on a project. However, a SEPA EIS is not required to weigh and balance all the possible effects and considerations evaluated by decision-makers in making final decisions about a project (WAC 197-11-448(2)). Examples of considerations that are not required to be analyzed under SEPA are defined in WAC 197-11-448(3), and include: method of financing proposals, economic competition, profits and personal income and wages and social policy analysis. Furthermore, monetary costs and benefits are not to be analyzed (WAC 197-11-450). However, given concerns raised during Scoping for the Fort Lawton Army Reserve Center Redevelopment Project EIS regarding the potential for the affordable housing component of the project to impact local property values, a brief discussion of these potential impacts is included in this section. This discussion is based on pertinent real estate studies.

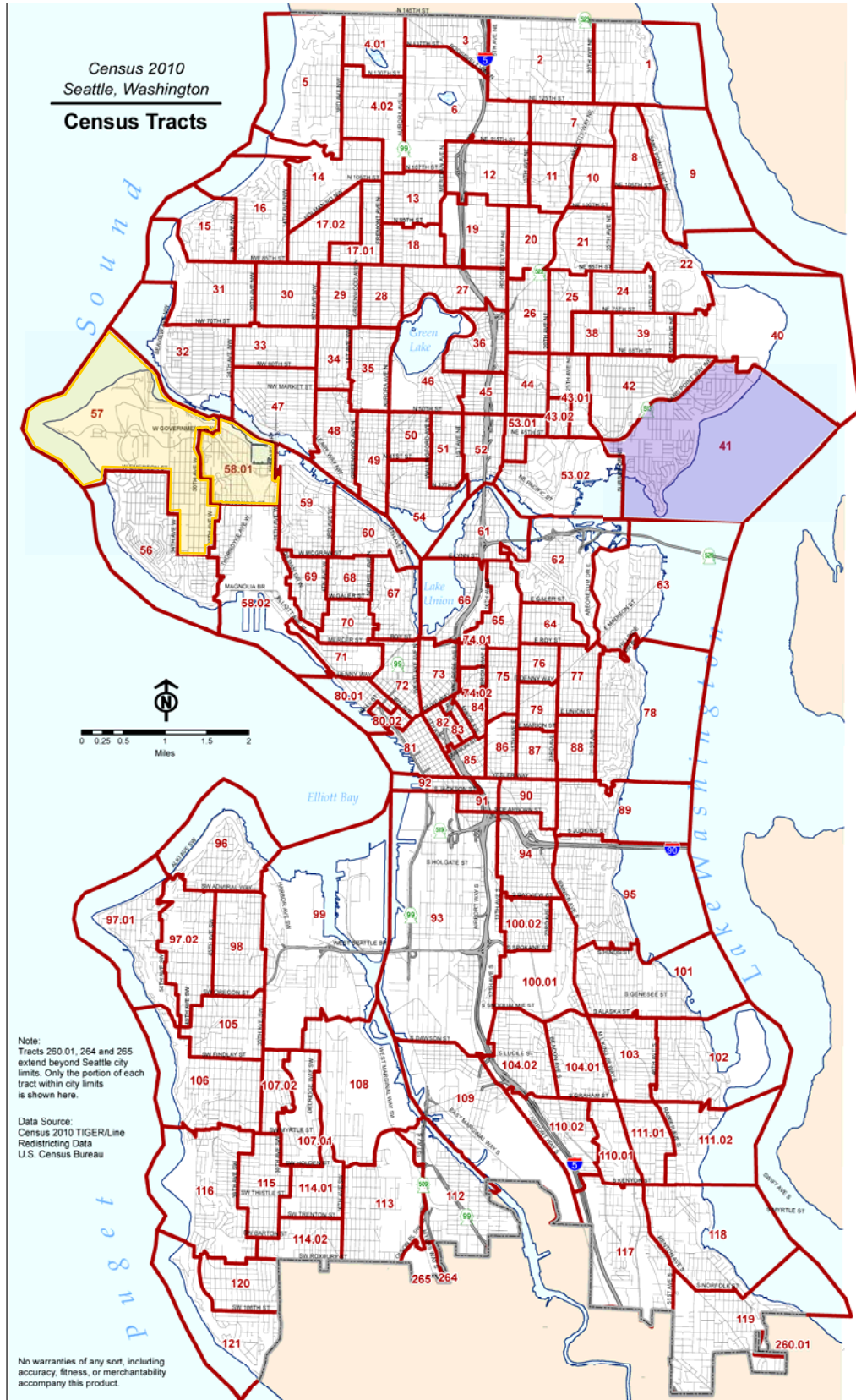
3.13.1 Affected Environment

Fort Lawton Site

The Fort Lawton site is presently vacant and contains no residences, population or full-time employment beyond employees associated with the basic upkeep and security of the site. To characterize existing conditions, housing, population characteristics and employment data are provided for the Fort Lawton vicinity and are compared to the city of Seattle as a baseline. The Fort Lawton vicinity is defined as the U.S. Census Tract in which the site is located (Census Tract 57), as well as the adjacent tract to the east (Census Tract 58.01) (see **Figure 3.13-1**, Census Tracts Map).

While some current demographic information is available for the Fort Lawton vicinity, the 2011-2015 American Community Survey (ACS) 5-Year Estimates generally contain the most recent, detailed data that are available at the census tract level. Therefore, the analysis in this section is based on this data set as opposed to the older 2010 decennial census or the more recent 2016 ACS 1-year estimates.

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Source: Census 2010 TIGER/Line Redistricting Data. U.S. Census

Figure 3.13-1
Census Tracts Map

Housing

The Fort Lawton site does not contain any housing units under existing conditions. **Table 3.13-1** presents the number of housing units within the Fort Lawton vicinity and within the city of Seattle, for comparison purposes. The majority of the housing supply in the vicinity is single-family, detached housing (51.3 percent). Comparatively, 43.6 percent of housing units in the city of Seattle are single-family detached. Housing in the Fort Lawton vicinity is 52% owner occupied and 48% renter occupied. The 52% rate for owner-occupied units is higher than the city of Seattle's rate of 46%.

Table 3.13-1
HOUSING CHARACTERISTICS – FORT LAWTON VICINITY

	FORT LAWTON VICINITY ¹	CITY OF SEATTLE
Total Housing Units	5,769	315,950
Occupied Units	5,354 (92.8%)	290,633 (93.9%)
Vacant Units	415 (7.2%)	19,317 (6.1%)
Owner Occupied	2,783 (52.0%)	136,823 (46.1%)
Renter Occupied	2,571 (48.0%)	159,810 (53.9%)
Housing Units Per Structure		
• 1, detached	2960 (51.3%)	137,950 (43.6%)
• 1, attached	223 (3.9%)	14,880 (4.7%)
• 2	229 (3.9%)	9,600 (3.0%)
• 3 – 4	262 (4.5%)	13,172 (4.2%)
• 5 – 9	459 (7.9%)	18,812 (6.0%)
• 10 - 19	487 (8.4%)	26,298 (8.3%)
• 20 or more	1,118 (19.3%)	94,004 (29.8%)
• Mobile home, Boat, Van	31 (0.5%)	

Source: Census Bureau, 2011-2015, American Community Survey, 5-year estimates.

Note: Percentages are rounded to the nearest one-tenth.

¹The Fort Lawton vicinity is comprised of Census Tracts 57 and 58.01 – there are no housing units on the Fort Lawton site.

Rent/Income-Restricted Housing in Seattle

The *Seattle 2035 Comprehensive Plan* defines rent/income-restricted housing as “housing with conditions that legally restrict the income of the tenants who live there and the rents that may be charged.”² As of June 2017, Seattle had approximately 30,500 rent/income-restricted housing units citywide, which are owned by a variety of public organizations (e.g. Seattle Housing Authority, community corporations), non-profit housing organizations, and for-profits. The highest concentration of rent/income-restricted units are in downtown Seattle. Most rent/income-restricted units are affordable to households with incomes at or below one-half of the U.S. Department of Housing and Urban Development (HUD) area

² *Seattle 2035 Comprehensive Plan*, Housing, November 2016, pp. 96-97.

median income (AMI), which in 2017 is \$33,600 for an individual and \$48,000 for a family of four.

The Seattle Housing Authority owns and manages over 8,000 housing units and administers 10,000 Housing Choice Vouchers, collectively serving nearly 35,000 individuals.³ The City of Seattle Office of Housing manages funds and investments to fund the preservation and production of affordable housing. Over 17,000 income-restricted affordable rental units throughout Seattle have been created or preserved with support by the City; over 900 families have received assistance to purchase a first home; and emergency rental assistance has been provided to over 7,700 households.

City Housing Plans

The *Seattle 2035 Comprehensive Plan* anticipates that by 2035 Seattle will add a minimum of 70,000 housing units (and 115,000 jobs). These estimates represent the City's share of King County's projected twenty-year growth. Seattle's comprehensive planning to accommodate this expected growth works from the assumption that the estimates for growth citywide are the minimums for which Seattle should plan.⁴ The City's growth plan primarily channels new housing and jobs to urban centers and urban villages. Although not in a designated urban center or urban village, the Fort Lawton site is located within an area designated in the *Seattle 2035 Comprehensive Plan* for multi-family residential uses.⁵

In Seattle, there are an estimated 33 affordable rental units per 100 renter households at or below 30% of AMI, which means that the gap of available and affordable rental units is 67 per 100 renter households in that income band. The gap of available and affordable rental units is 44 per 100 renter households with incomes at or below 50% of AMI (cumulative), and is 11 per 100 renter households with incomes at or below 80% of AMI (cumulative).⁶ More than three-quarters of households in the 0-30 percent of AMI and 30-50 percent of AMI categories spend more than 30 percent of income on housing and more than 60 percent of households with incomes of 0-30 percent of AMI spend more than half of their income on housing.⁷ Overall, about 44 percent of Seattle households of color are burdened by unaffordable housing costs compared with 35 percent of white, non-Hispanic households.⁸ The lack of affordable and available housing in Seattle leaves people with low-incomes at risk of displacement and potentially homelessness.

To meet the affordable housing needs associated with a minimum of 70,000 housing units being planned for by the City, the *Seattle 2035 Comprehensive Plan* estimates at least 10,500 rent/income-restricted units would be needed for households with incomes of 0-30

³ Seattle Housing Authority, *2016 Annual Report*.

⁴ *Seattle 2035 Comprehensive Plan*, Growth Strategy, November 2016, p. 28.

⁵ *Seattle 2035 Comprehensive Plan*, Citywide Planning, Future Land Use Map, November 2016, p. 41.

⁶ *Seattle 2035 Comprehensive Plan*, Housing Appendix, November 2016, page 516.

⁷ *Seattle 2035 Comprehensive Plan*, Housing Appendix, November 2016, p. 478.

⁸ *Seattle 2035 Comprehensive Plan*, Housing Appendix, November 2016, p. 483.

percent of AMI. This assumes that all units affordable in this category would be rent/income-restricted housing, given that it would be highly unlikely that the market would produce new units affordable at this income level without subsidy or regulatory intervention. For households with incomes 30-50 percent of AMI: 7,500 rent/income-restricted housing units (with need met entirely by rent/income-restricted housing) or an additional 11,500 affordable units (if need could be met with a combination of rent/income-restricted housing and non-restricted units).⁹ For households with incomes 50-80 percent of AMI: 9,500 rent/income-restricted housing units (with need met entirely by rent/income-restricted housing) or an additional 14,500 affordable units (if need could be met with a combination of rent/income-restricted housing and non-restricted units). Overall, addressing the affordability needs of 70,000 new households would require production of roughly 27,500 to 36,500 housing units affordable at or below 80 percent of AMI. This is in addition to affordable housing to address unmet need.¹⁰

Socioeconomics

Demographics

As demonstrated by **Table 3.13-2**, the Fort Lawton vicinity is less diverse overall and contains fewer minorities compared to the overall percentages in the city of Seattle. The city of Seattle's population is roughly 30.5% minority, while approximately 18.4% of residents in the Fort Lawton vicinity are minorities. Asians/Asian Americans, Hispanics and Africans/African Americans represent the largest minority populations in the vicinity.

**Table 3.13-2
RACE AND ETHNICITY – FORT LAWTON VICINITY**

	RACE								Hispanic or Latino
	ONE RACE							Two or More Races	
	Total Pop.	White	Black or African American	American Indian & Alaska Native	Asian	Native Hawaiian & Pacific Islander	Other Race		
FL Vicinity¹	11,845	9,666	615	85	753	0	83	643	683
		81.6%	5.2%	0.7%	6.4%	0.0%	0.7%	5.4%	5.8%
City of Seattle	653,017	454,000	47,202	4,440	92,776	2,542	12,135	39,922	42,490
		69.5%	7.2%	0.7%	14.2%	0.4%	1.9%	6.1%	6.5%

Source: 2011-2015 American Community Survey.

¹ Census Tracts 57 and 58.01.

⁹ Availability as well as affordability must be factored in when a portion of affordable units are not rent/income-restricted. However, it is unlikely that any sizeable number of market-rate units would be affordable in this range. (*Seattle 2035 Comprehensive Plan*, Housing Appendix, November 2016, p. 519).

¹⁰ *Seattle 2035 Comprehensive Plan*, Housing Appendix, November 2016, p. 519.

Table 3.13-3 shows that shares of the population in the city of Seattle compared to the Fort Lawton vicinity are the same or similar in terms of gender, persons aged 65 or older, and persons with a disability. In the Fort Lawton vicinity, the share of population under age 18 is 2.9 percent higher and the share of the population that is female is 2.6 percent higher, compared to those shares for the city of Seattle. In the Fort Lawton vicinity, the share of population that is foreign-born is 7.4 percent lower and the share of the population that speaks English less than “very well” is 6.3 percent lower, compared to those shares for the city of Seattle.

**Table 3.13-3
POPULATION CHARACTERISTICS – FORT LAWTON VICINITY**

	FORT LAWTON VICINITY ¹	CITY OF SEATTLE
Total Population	11,845	653,017
• Male	• 5,643 (47.6%)	• 327,600 (50.2%)
• Female	• 6,202 (52.4%)	• 325,417 (49.8%)
% Population Under Age 18	18.3%	15.4%
Population Age 65 and Older	11.6%	11.6%
Population with a Disability	1,067 (9.0%)	60,663 (9.4%)
Foreign-Born Population	1,276 (10.7%)	118,225 (18.1%)
Speak English Less Than ‘Very Well’	309 (2.6%)	55,054 (8.9%)

Source: 2011-2015 ACS 5-Year Estimates.

¹ Census Tracts 57 and 58.01.

Income and Poverty

The Department of Housing and Urban Development (HUD) defines low-income categories as follows:¹¹

- Extremely low-income at or below 30 percent of AMI
- Very low-income at or below 50 percent of AMI
- Low-income at or below 80 percent of AMI

These income categories established by HUD are used by states and local jurisdictions, including the city of Seattle, for purposes of administering affordable housing programs and funding.

Area median income, or AMI, is the annual median family income for the Seattle area (the King-Snohomish county region, not just the city), as published by HUD, with adjustments for

¹¹ 42 U.S.C. 1437a(b)(2).

household size, assuming 1 person for a studio apartment and 1.5 people per bedroom for other units.

For purposes of comparison between the Fort Lawton vicinity and city of Seattle only, **Table 3.13-4** shows the median household income as reported to the U.S. Census Bureau.¹² The Census median household income is different than and therefore not comparable to the area median income measure used by HUD. The Census median household income based on the 2011-2015 American Community Survey is \$90,951 in Census Tract 57 and is \$66,563 in Census Tract 58.01, compared to \$70,594 for the city of Seattle.

Table 3.13-4
INCOME AND POVERTY INFORMATION – FORT LAWTON VICINITY

	FORT LAWTON VICINITY		CITY OF SEATTLE
	CT 57	CT 58.01	
Total Population	6,633	5,212	653,017
Total Number of Households	2,741	2,613	296,633
Median Household Income	\$90,951	\$66,563	\$70,594

Source: 2011-2015 American Community Survey 5-Year Estimates.

Employment

Presently, there are no active uses on the Fort Lawton site and no economic activity is directly associated with the site.

With unemployment rates of 2.6% and 3.1% in Census Tracts 57 and 58.01 respectively, the vicinity contains lower ratios of unemployed people than the city of Seattle overall, at approximately 4.1%. The U.S. Census Bureau defines employed people as all civilians 16 years old and over who worked as paid employees, worked in their own business or profession, worked on their own farm or worked 15 hours or more as unpaid workers on a family farm or in a family business. Individuals whose activity consisted of work around the house or unpaid volunteer work for religious, charitable and similar organizations are excluded from the 'employed' category.

¹² HUD's "area median income" (AMI) is used to determine eligibility for a wide variety of affordable housing programs; it is not comparable with "median household income," as reported by the U.S. Census Bureau.

**Table 3.13-5
EMPLOYMENT – FORT LAWTON VICINITY**

	FORT LAWTON VICINITY		CITY OF SEATTLE
	CT 57	CT 58.01	
Population 16 years and older	5,357	4,506	561,177
People in Civilian Labor Force	3,616 (67.5%)	3,639 (80.8%)	405,528 (72.3%)
Unemployment Rate	137 (2.6%)	138 (3.1%)	23,009 (4.1%)

Source: 2011-2015 American Community Survey 5-Year Estimates.

City of Seattle Growth Plans – Employment

The *Seattle 2035 Comprehensive Plan* plans for economic growth totaling a minimum of 115,000 new jobs within the city of Seattle by 2035. As with housing, the Comprehensive Plan articulates how to accommodate the majority of employment growth in Seattle’s urban centers. The Fort Lawton site is not located within an urban center or urban village, but rather within an area designated in the *Seattle 2035 Comprehensive Plan* for multi-family residential uses.¹³

Talaris Site

The Talaris site is presently a conference center with lodging and open space that is available to rent for events and meetings. To characterize existing socioeconomic conditions, population characteristics, housing and employment data are provided for the Talaris vicinity, and are compared to the city of Seattle as a baseline. The vicinity is defined as the Census Tract in which the site is located (Census Tract 41) (see **Figure 3.13-1**, Census Tract Map).

Housing

The Talaris site contains three apartment buildings; however, there are no permanent residences on the site. The apartment facilities are associated with the Talaris Conference Center and are used for temporary lodging only.

As shown in **Table 3.13-6**, the site is located within Census Tract 41, a residential area consisting primarily of detached, single-family homes (73.4% of total housing units). Comparatively, the share of single-family housing in the city of Seattle is 43.6%. The percentage of owner-occupied units (66.2%) in the Talaris vicinity is also far greater than the city of Seattle’s overall share (46.1%).

¹³ *Seattle 2035 Comprehensive Plan*, Citywide Planning, Future Land Use Map, November 2016, p. 41.

**Table 3.13-6
HOUSING CHARACTERISTICS – TALARIS VICINITY**

	TALARIS VICINITY ¹	CITY OF SEATTLE
Total Housing Units	3,115	315,950
Occupied Units	2,900 (93.1%)	290,633 (93.9%)
Vacant Units	215 (6.9%)	19,317 (6.1%)
Owner Occupied	1,921 (66.2%)	136,823 (46.1%)
Renter Occupied	979 (33.8%)	159,810 (53.9%)
Housing Units Per Structure		
• 1, detached	2,287 (73.4%)	137,950 (43.6%)
• 1, attached	126 (0.4%)	14,880 (4.7%)
• 2	12 (0.4%)	9,600 (3.0%)
• 3 – 4	230 (7.4%)	13,172 (4.2%)
• 5 – 9	176 (5.7%)	18,812 (6.0%)
• 10 - 19	145 (4.7%)	26,298 (8.3%)
• 20 or more	106 (3.4%)	94,004 (29.8%)
• Mobile home, Boat, Van	0	

Source: Census Bureau, 2011-2015, American Community Survey, 5 year estimates.

Note: Percentages are rounded to the nearest one-tenth

¹ Census Tract 41 – there are no housing units on the project site.

Socioeconomics

Demographics

As shown in **Table 3.13-7**, the Talaris vicinity is less racially diverse overall and contains lower shares of minorities compared to the city of Seattle. Seattle’s population is roughly 30.5% minority, while approximately 16.5% of residents in the Talaris vicinity are minorities. Asians/Asian Americans and African Americans represent the greatest shares of the minority population in the vicinity.

Table 3.13-8 shows that the Talaris vicinity population characteristics are similar to those of the city of Seattle overall. Specifically, shares of population in the Talaris vicinity compare to the city of Seattle as follows: 0.9 percent more male, 2.9 percent more persons age 65 and older, 2.0 percent less persons with a disability, 1.8 percent less foreign born, and 3.1 percent less speak English less than “very well.” The share of population under age 18 is 9.8 percent greater in the Talaris vicinity compared to the city of Seattle.

**Table 3.13-7
RACE AND ETHNICITY INFORMATION – TALARIS VICINITY**

	RACE								Hispanic or Latino
	ONE RACE							Two or More Races	
	Total Pop.	White	Black or African American	American Indian & Alaska Native	Asian	Native Hawaiian & Pacific Islander	Other Race		
TALARIS VICINITY ¹	7,868	6,573	2	11	907	7	19	349	131
		83.5%	0%	0.1%	11.5%	0.1%	0.2%	4.4%	1.7%
CITY OF SEATTLE	653,017	454,000	47,202	4,440	92,776	2,542	12,135	39,922	42,490
		69.5%	7.2%	0.7%	14.2%	0.4%	1.9%	6.1%	6.5%

Source: 2011-2015 American Community Survey.

¹ Census Tract 41.

**Table 3.13-8
POPULATION CHARACTERISTICS – TALARIS VICINITY**

	TALARIS VICINITY ¹	CITY OF SEATTLE
Total Population	7,868	653,017
• Male	• 4,019 (51.1%)	• 327,600 (50.2%)
• Female	• 3,849 (48.9%)	• 325,417 (49.8%)
% Population Under Age 18	25.2%	15.4%
Population Age 65 and Older	14.5%	11.6%
Population with a Disability	581 (7.4%)	60,663 (9.4%)
Foreign Born Population	1,283 (16.3%)	118,225 (18.1%)
Speak English Less Than 'Very Well'	432 (5.8%)	55,054 (8.9%)

Source: 2011-2015 ACS 5-Year Estimates.

¹ Census Tract 41.

Income and Poverty

As presented in **Table 3.13-9**, the Talaris vicinity median household income of \$132,917 is nearly double the city of Seattle median household income of \$70,594.

**Table 3.13-9
INCOME AND POVERTY INFORMATION – TALARIS VICINITY**

	TALARIS VICINITY ¹	CITY OF SEATTLE
Total Population	7,868	653,017
Total Number of Households	2,900	296,633
Median Household Income	\$132,917	\$70,594

Source: 2011-2015 American Community Survey 5-Year Estimates.

¹ Census Tract 41.

Employment

The Talaris vicinity contains fewer individuals in the labor force compared to the city of Seattle (66.4% versus 72.3%). As well, at 3.1% unemployment, the vicinity contains lower ratios of unemployed people than the city of Seattle overall, at approximately 4.1% (see **Table 3.13-10**).

**Table 3.13-10
EMPLOYMENT – TALARIS VICINITY**

	TALARIS VICINITY	CITY OF SEATTLE
Population 16 Years and Older	6,083	561,177
People in Civilian Labor Force	4,042 (66.4%)	405,528 (72.3%)
Unemployment Rate	190 (3.1%)	23,009 (4.1%)

Source: 2011-2015 American Community Survey 5-Year Estimates.

3.16.2 Impacts

An analysis of the potential housing and socioeconomic impacts of Alternative 1, the Applicant's Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

Comparison of Housing and Population Conditions Under the EIS Alternatives

This section provides a summary comparison of housing and population characteristics under the EIS alternatives. Each alternative is described in more detail later in this section. **Table 3.13-11** provides a summary breakdown of the number and type of housing units under the alternatives at buildout. As shown, all three alternatives would contain the same

number and types of affordable housing units, but would differ in the location of those units, and the amount of market-rate housing (only Alternative 2 includes market-rate homes).

**Table 3.13-11
NUMBER AND TYPE OF HOUSING UNITS - ALTERNATIVES 1 - 3**

	ALT. 1		ALT. 2		ALT. 3	
	F. L. SITE	TALARIS SITE	F. L. SITE	TALARIS SITE	F. L. SITE	TALARIS SITE
NUMBER OF HOUSING UNITS BY TYPE						
Lowrise Apts. - Studios (Supportive Senior Rental Housing)	86	0	0	86	0	86
Rowhouse Apts. – 1, 2 & 3 BR (Affordable Rental)	100	0	0	100	0	100
Townhouses – 3BR (Affordable Homeownership)	40	0	0	40	0	40
Rowhouses – 3BR (Affordable Homeownership)	12	0	0	12	0	12
Single-Family Housing (Market-rate Homeownership)	0	0	113	0	0	0
TOTAL	238	0	113	238	0	238

Source: Seattle Office of Housing, 2017.

Table 3.13-12 summarizes the estimated population that could result with each type of housing under the EIS alternatives. As shown, all three alternatives would contain the same affordable housing mix and population levels, and would differ only in terms of the additional population associated with market-rate housing (Alternative 2 only). For purposes of this DEIS analysis, population estimates were generated for each housing type (persons per household): formerly homeless seniors, affordable rentals, affordable homeownership and market-rate.¹⁴

**Table 3.13-12
POPULATION ESTIMATES - ALTERNATIVES 1 – 3**

	ALT. 1		ALT. 2		ALT. 3	
	F. L. SITE	TALARIS SITE	F. L. SITE	TALARIS SITE	F. L. SITE	TALARIS SITE
POPULATION						
Supportive Senior Rental Housing	86	--	--	86	--	86
Affordable Rental	250	--	--	250	--	250
Affordable Homeownership	260	--	--	260	--	260
Market-rate Homeownership	--	--	565	--	--	--
TOTAL	596	0	565	596	0	596

¹⁴ Population estimates for rent-restricted affordable housing are based on comparable projects and are calculated as follow:

- Senior Supportive housing – 86 residents (86 units x 1.0 resident per unit);
- Affordable rental – 250 residents (100 units x 2.5 residents per unit); and
- Affordable ownership - 260 residents (52 units x 5.0 residents per unit).

Source: Seattle Office of Housing, 2017.

Alternative 1– Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant’s Preferred Alternative)

Alternative 1 would include 238 residential units with residential support services, as well as public park uses, on the Fort Lawton site. No development is assumed for the Talaris site.

Fort Lawton Site

Construction Impacts

Future redevelopment assumed under Alternative 1 would consist of three primary construction-related activities: 1) demolition of existing buildings and demolition of some existing utilities and paved areas; 2) construction of new site infrastructure, including primary roadways, utilities and open space/parks; and 3) construction of new buildings and associated parking.

Construction activities under this alternative would result in new temporary construction employment opportunities during the approximately seven-year site buildout. Based on the assumed buildout in 2025, construction would occur on a periodic basis over that timeframe. Construction jobs would be discontinued once redevelopment on the site is completed.

Operational/Direct Impacts

Housing

Under Alternative 1, the total number of residential units onsite would increase from 0 to 238. Density would increase from 0 dwelling units/acre to 7 dwelling units/acre over the entire 34-acre site. **Table 3.12-11** summarizes the proposed housing mix to be developed under the alternatives. As shown on the table, under Alternative 1 the housing units would include apartments with supportive services for seniors, affordable rental apartments, and affordable homes for ownership in lowrise apartments, rowhouses, and townhouse style units. Approximately 78 percent of the housing units would be rental housing and the remaining 22 percent of the units would be for ownership.

The affordable housing developed onsite would support households with a range of income levels, as detailed below.

- **Senior Supportive Rental Housing** for senior citizens (55 years of age and older), including veterans, who were formerly homeless and have incomes at or below 30% of the area median income (AMI);¹⁵
- **Affordable Rental** for households with incomes at or below 60% of the AMI; and,

¹⁵ Per the U.S. Department of Housing and Urban Development, the FY 2017 AMI for a family of four in the Seattle-Bellevue HUD Metro Fair Market Rent Area (HMFA) is \$96,000.

- **Affordable Homeownership** for sale to households with incomes at or below 80% of the AMI.

City Housing Needs

The housing provided onsite under Alternative 1 would contribute towards the minimum of 70,000 housing units anticipated to account for Seattle's share of King County's growth by 2035.¹⁶ It would also help address the City's goal of making it possible for households of all incomes to live affordably in Seattle, and reduce the unmet housing needs of lower income households in Seattle.¹⁷ Alternative 1 would contribute towards the City's target for 27,500 to 36,500 additional housing units affordable and available to households with incomes at or below 80% of AMI to meet the needs associated with growth by 2035.

As noted previously, Alternative 1 would add 238 low-income housing units for households with a range of low-income levels at a site that currently contains no housing. Of the total, 86 would be units for extremely low-income seniors (supportive housing for formerly homeless seniors with incomes at or below 30% of AMI), and would address the need associated with projected growth for a minimum 10,500 units affordable and available to households with incomes at or below 30% of the AMI. The 100 rental units for low-income households (at or below 60% of AMI) would address Seattle's need associated with projected growth through 2035 for a minimum of 9,500 units affordable and available to households with incomes no higher than 80% of AMI. Overall, the addition of 238 affordable housing units would represent an approximately 0.008% increase to Seattle's supply of approximately 30,700 income-restricted affordable housing units.

The Magnolia neighborhood is generally a high cost neighborhood, particularly with regard to for-sale housing. The Fort Lawton vicinity (Census Tracts 57 and 58.01) average rent in Fall 2017 was \$1,710 (9 buildings totaling 818 apartment units), compared to \$1,823 citywide.¹⁸ According to Zillow, the median list price per square foot in Magnolia is \$482, which is higher than the city of Seattle average of \$470. The median home value in Magnolia is \$909,000. Magnolia home values increased 10.0% between fall of 2016 and fall of 2017 and Zillow predicts they will rise 4.4% within the next year.¹⁹ Providing affordable housing on the Fort Lawton site would help address the City's goal of achieving a mix of housing types that provide opportunity and choice throughout Seattle for people of various ages, races, ethnicities, and cultural backgrounds and for a variety of household sizes, types and incomes.²⁰ As noted in **Chapter 2**, Magnolia is among the neighborhoods that used

¹⁶ *Seattle 2035 Comprehensive Plan*, Growth Strategy, November 2016, p. 28.

¹⁷ *Seattle 2035 Comprehensive Plan*, Housing, November 2016, p. 103.

¹⁸ Dupre + Scott Apartment Advisors, *Apartment Vacancy Report*, September 2017.

¹⁹ Zillow, November 2017. <https://www.zillow.com/magnolia-seattle-wa/home-values/>

²⁰ *Seattle 2035 Comprehensive Plan*, Housing, November 2016, p. 100.

restrictive covenants in the past and has remained a relatively exclusive neighborhood with little to no access to affordable housing choices for those with low-incomes.²¹

Relationship to Housing in Vicinity

The additional 238 housing units on the Fort Lawton site would represent a modest increase to the housing supply in the Fort Lawton vicinity overall (census tracts 57 and 58.01). There are 5,769 housing units in the vicinity currently (census tracts 57 and 58.01), and this would increase by 4.1% to 6,007 units. The redevelopment would also contribute to diversifying the housing supply by adding multi-family housing in a neighborhood dominated by single-family homes (currently 51.3% single-family detached in the Fort Lawton vicinity).

Alternative 1 is not anticipated to have a negative effect on established real estate values located adjacent to or near the Fort Lawton site. Research conducted by Trulia examined over 3,000 affordable housing developments financed over a ten-year span (1996 to 2006) using federal low-income housing tax credits. The values of property within 2,000 feet of the affordable housing were compared to the value of buildings further away (2,000 to 4,000 feet). The comparison showed no decline in value/square feet of real estate, except for two cases in the Boston area and where slight declines in the values of nearby buildings occurred, which was attributed to unique local factors. In another case (in Denver), the value of properties located nearby low-income housing was shown to increase. Overall, the study indicates that low-income housing development does not affect nearby home values, particularly in cities with expensive or limited housing supply, such as Seattle.²²

Socioeconomics

Under Alternative 1, the permanent on-site residential population would increase from 0 to approximately 596 residents (see **Table 3.13-12**). The availability of low-income housing on a site that has not recently contained housing could alter the demographics of the surrounding neighborhood in several ways.

Relative to the age distribution, the percentage of residents aged 65 years and older (currently approximately 11.6 percent in the vicinity) could slightly increase with the addition of 86 senior citizens. The ethnic makeup of the site could also shift, although the precise extent of change in racial and ethnic diversity onsite cannot be determined. Overall, the proportion of minorities and immigrants in the vicinity would be expected to increase as compared to existing conditions where the vicinity is 18.4 percent minority, compared to a 30.5 percent minority population citywide.

The addition of affordable housing to the Fort Lawton site would also have the effect of economically diversifying the community. The median household incomes in the vicinity

²¹ Seattle Civil Rights and Labor History Project, Racial Restrictive Covenants, <http://depts.washington.edu/civilr/covenants.htm>

²² Young, Cheryl. *There Doesn't Go the Neighborhood, Low-Income Housing Has No Impact on Nearby Home Values*. Trulia's Blog. November 2016.

(estimated \$90,951 in Census Tract 57 and \$66,563 in Census Tract 58.01) could be expected to decrease.

In sum, the shares of the population by age, ethnicity and income levels that currently exist in the Fort Lawton vicinity would be anticipated to shift towards ratios more consistent with the city of Seattle due to the diversity of the housing supply developed on the Fort Lawton site and the introduction of low-income residents to a relatively affluent area of the city of Seattle.

The site would also shift from having no residential uses to having housing with associated supportive services for low-income residents. The senior housing would be served by case managers and residential counselors. The affordable rental housing would include building managers and grounds keepers, constituting a minor amount of employment (see **Chapter 2** for details).

Indirect Impacts

Redevelopment of the Fort Lawton site under Alternative 1 would result in a low-income residential community together with parking, open space and some residential and community support services. These changes would result in increased density and an economically diversified population in the Fort Lawton vicinity. This could result in increased spending for goods and services within the area near the site. Nearby neighborhood commercial businesses could benefit from spending associated with residential development on the site.

Talaris Site

Under Alternative 1, no new development would occur on the Talaris site. The existing uses on the site would remain and housing and socioeconomic conditions would not change.

Alternative 2- Market-Rate Housing Onsite; Affordable/Homeless Housing Offsite

Under Alternative 2, it is assumed the Fort Lawton site would be sold to a private developer for the development of market-rate single-family residences, and the development of affordable housing and housing for formerly homeless seniors would occur on the Talaris site. Approximately 113 market-rate houses would be developed on the Fort Lawton site and approximately 238 affordable housing units and associated community facilities would be developed on the Talaris site. No active or passive public park areas would be provided under Alternative 2.

Fort Lawton Site

Construction Impacts

Construction impacts under Alternative 2 would include temporary impacts from demolition, site preparation and construction of infrastructure and single-family residential

buildings. Construction employment opportunities during the approximately seven-year site buildout would be like under Alternative 1, with construction occurring on a periodic basis over an extended period of time, and construction jobs being discontinued once redevelopment on the site is completed.

Operation/Direct Impacts

Housing

Under Alternative 2, the total number of residential units onsite would increase from 0 to 113. Density would increase from 0 dwelling units/acre to 3.3 dwelling units/acre over the entire 34-acre site. All the housing on the Fort Lawton site under Alternative 2 would be single-family detached homes. These homes would likely be designed and constructed to be marketed to high-income buyers. The average sale price is estimated at \$1.5 million, which is comparable based on listings for new construction single-family in the Magnolia neighborhood.²³

City Housing Needs

The 113 market-rate housing units provided on the Fort Lawton site under Alternative 2 would contribute towards meeting the City's overall plan to provide a minimum of 70,000 units of additional housing units by 2035. However, the housing under Alternative 2 at this location would not address Seattle's affordable housing target associated with projected growth through 2035.

Relationship to Housing in Vicinity

The additional 113 market-rate housing units on the Fort Lawton would represent a nominal increase to the supply of housing units in the Magnolia neighborhood overall. There are 5,769 housing units in the vicinity currently (census tracts 57 and 58.01), and this would increase by 2.0% to 5,882 units. The proposal under Alternative 2 would continue the existing prevalence of single-family homes (51.3%) in the vicinity.

Socioeconomics

Under Alternative 2, the permanent on-site residential population would increase from 0 to approximately 565 residents (see **Table 3.13-12**).²⁴ The introduction of market-rate housing and associated residents on a site that has not recently contained housing would not be expected to substantially alter the demographics of the surrounding neighborhood. Rather, existing trends in terms of age, gender, income and ethnicity would likely continue and with

²³ Zillow, November 2017. https://www.zillow.com/homes/Magnolia-Seattle-WA_rb/

²⁴ This conservatively assumes an average household size for the market-rate housing of 5, although the average household size for owner-occupied housing units in Seattle is far lower, 2.39 (2011-2015 American Community Survey).

minimal diversification of the Fort Lawton vicinity, which has lower shares of minorities and higher shares of high-income households than the city of Seattle overall.

No direct jobs would be supported on the site, but increased spending on goods and services in the larger Magnolia neighborhood would be expected from the higher-income residents anticipated with the new market-rate single-family housing.

Talaris Site

Construction Impacts

Future redevelopment assumed under Alternative 2 on the Talaris site would require construction-related activities associated with retaining and reusing existing buildings on-site, as well as constructing new housing. Construction employment opportunities during the approximately seven-year site buildout would be the same as described for the Fort Lawton site under Alternative 1, with construction occurring on a periodic basis over an extended period of time, and construction jobs being discontinued once redevelopment on the site is completed.

Operational/Direct Impacts

Housing

Under Alternative 2, the total number of residential units on the Talaris site would increase from 0 to 238. Density would increase from 0 dwelling units/acre to approximately 13.2 dwelling units/acre over the entire 18-acre site. **Table 3.12-11** summarizes the proposed housing mix to be developed under the alternatives. As shown in the table, under Alternative 2 the housing units at the Talaris site would include apartments for formerly homeless seniors, affordable rental apartments and affordable homes for ownership in lowrise apartments, rowhouses, and townhouse style units in the same distribution as that assumed for the Fort Lawton site under Alternative 1. Approximately 78 percent of the housing units would be rental housing and the remaining 22 percent of the units would be for ownership.

City Housing Needs

Like Alternative 1, the housing provided on the Talaris site under Alternative 2 would contribute towards the minimum of 70,000 housing units anticipated to be needed in the city of Seattle by 2035.²⁵ It would also help address the City's goal of making it possible for households of all income levels to live affordably in Seattle, and reduce over time the unmet housing needs of lower-income households in Seattle.²⁶ Alternative 2 would contribute

²⁵ *Seattle 2035 Comprehensive Plan*, Growth Strategy, November 2016, p. 28.

²⁶ *Seattle 2035 Comprehensive Plan*, Housing, November 2016, p. 103.

towards the City's target for 27,500 to 36,500 additional housing units at or below 80% of AMI to meet the needs associated with growth by 2035.

As noted previously, Alternative 2 would add 238 low-income housing units for a range of low-income levels to a site that currently contains no housing. Overall, the addition of 238 affordable housing units would represent an approximately 0.008% increase to Seattle's supply of approximately 30,700 income-restricted affordable housing units.

The Laurelhurst neighborhood is an area with high housing costs/values. The average rent in the Talaris vicinity (Census Tract 41) in Fall 2017 was \$1,313 (2 buildings totaling 63 apartment units), compared to \$1,823 citywide.²⁷ The median home value in Laurelhurst is \$1,458,500. Laurelhurst home values increased 8.9% between fall of 2016 and fall of 2017 and Zillow predicts they will rise 4.5% within the next year.²⁸ Providing affordable housing in the Talaris vicinity would contribute towards the City of Seattle's goal to provide opportunity and choice throughout Seattle for people of various ages, races, ethnicities, and cultural backgrounds and for a variety of household sizes, types and incomes.²⁹ As noted in **Chapter 2**, Laurelhurst is among the neighborhoods that used restrictive covenants in the past and has remained a relatively exclusive neighborhood with little to no access to affordable housing choices for those with low-incomes.³⁰

Relationship to Housing in Vicinity

The additional 238 housing units on the Talaris site under Alternative 2 would represent a moderate increase to the housing supply in the Talaris vicinity overall. There are approximately 3,115 housing units in the vicinity currently (census tract 41), and this would increase by 7.6% to 3,353 units. The proposal would also help diversify the housing supply by adding multi-family housing in a neighborhood dominated by single-family homes (73.4% single-family homes in vicinity).

Socioeconomics

Under Alternative 2, the permanent on-site residential population would increase from 0 to approximately 596 residents (see **Table 3.13-12**). The availability of low-income housing on a site that has not recently contained housing could alter the demographics of the surrounding neighborhood in several ways.

The ethnic makeup of the vicinity could shift, although the precise extent of change in racial and ethnic diversity onsite cannot be determined. Overall, the proportion of minorities and immigrants in the vicinity would be expected to increase compared to existing conditions wherein the vicinity is approximately 16.5 percent minority, compared to the 30.5 percent

²⁷ Dupre+Scott Apartment Advisors, *Apartment Vacancy Report*, September 2017.

²⁸ Zillow, November 2017. <https://www.zillow.com/laurelhurst-seattle-wa/home-values/>

²⁹ *Seattle 2035 Comprehensive Plan*, Housing, November 2016, p. 100.

³⁰ Seattle Civil Rights and Labor History Project, Racial Restrictive Covenants, <http://depts.washington.edu/civilr/covenants.htm>

of minority population citywide. The addition of affordable housing to the Talaris site would also have the effect of economically diversifying the community. The median household income in the Talaris vicinity (estimated at \$132,917, nearly double the city of Seattle median) could be expected to decrease.

In sum, as with Alternative 1 on the Fort Lawton site, the age, gender, ethnicity and income levels that currently exist onsite would be anticipated to shift towards ratios more consistent with the city of Seattle due to the diversity of the housing supply that would be developed, enabling low-income households access to one of Seattle's most affluent neighborhoods.

The site would also shift from being a conference center with hotel uses, to housing and associated supportive services for low-income residents. Overall economic activity and the number of jobs onsite would likely decrease as compared to existing conditions. The number of jobs associated with senior housing, affordable rental housing and overall management of the development would be as described for Alternative 1. It is likely that new residents would spend money on goods and services within the greater Talaris vicinity, although the extent of such spending is not known.

Indirect Impacts

Under Alternative 2, the Talaris site would be developed to create a low-income residential community with community support services. This would increase density and diversify the population, economically, in the Talaris vicinity.

Like under Alternative 1, the proposal would not be anticipated to have a negative effect on real estate values within the Talaris vicinity. Research indicates that low-income housing developments do not affect nearby home values, particularly in cities with expensive or limited housing supply, such as Seattle.³¹

Alternative 3 - Public Park Onsite; Affordable and Homeless Housing Offsite

Under Alternative 3, the entire Fort Lawton site would be developed as a public park; construction of affordable and formerly homeless housing would occur at the Talaris site.

Fort Lawton Site

Construction Impacts

As with Alternative 1, most of the existing buildings on the Fort Lawton site would be demolished and removed. Site grading would occur, and passive and active open space areas would be developed for use by the public. Overall, less construction activity would

³¹ Young, Cheryl. *There Doesn't Go the Neighborhood, Low-Income Housing Has No Impact on Nearby Home Values*. Trulia's Blog.

occur on the site than under Alternatives 1 or 2, where the construction of either affordable or market-rate housing would occur.

Operation/Direct Impacts

Housing

No housing would be built on the Fort Lawton site under Alternative 3. Housing conditions in the Fort Lawton vicinity would remain as described under existing conditions. At this site, Alternative 3 would not address Seattle's anticipated overall housing needs or affordable housing target associated with projected growth through 2035.

Socioeconomics

While members of the public would access the site to use newly-developed parks and open space, no permanent residential population would be added to the Fort Lawton site under Alternative 3. Population conditions on and in the Fort Lawton vicinity related to numbers of people, race and ethnicity, age, gender, income, and employment would remain similar to those described under existing conditions.

Talaris Site

Development of affordable and formerly homeless housing on the Talaris site would be the same as described under Alternative 2 and potential housing and socioeconomic impacts would also be the same.

Alternative 4 – No Action Alternative

Under the No Action Alternative, the Fort Lawton site would remain in its existing vacant condition. The property would not be conveyed by the U.S. Army to the City of Seattle per the BRAC process. The City would terminate its lease of the property and the Army would resume maintenance of the site and facilities. Buildings and infrastructure would likely continue to deteriorate. No changes to existing housing, population or socioeconomic conditions on or in the site would occur. No new affordable housing would be provided, and the site would not help address the city of Seattle's current and future overall need for housing, and need for housing that is affordable to low-income households and people transitioning from homelessness. The site could be conveyed to the City or conveyed or sold to another entity in the future, and could be developed in accordance with the uses allowed by the site's current SF 7200 zoning.

The Talaris site would also remain in its existing condition and no new development would occur on the site at this time. No changes to existing housing or socioeconomic conditions on or in the vicinity of the site would occur.

3.16.3 Mitigation Measures

Increases in population and housing would occur gradually within the Fort Lawton and Talaris sites over the 7-year buildout period. No significant housing or socioeconomic impacts are expected to result from any of the redevelopment alternatives and as a result, no mitigation measures are identified.

3.16.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse housing or socioeconomic impacts are expected.

3.14 ENVIRONMENTAL JUSTICE

This section of the DEIS describes the environmental justice-related conditions on and near the Fort Lawton and Talaris sites. Potential disproportionate and/or adverse impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified.

Key Findings

Very few low-income or minority populations are located in the Fort Lawton vicinity or Talaris vicinity, and the minority populations that do, do not meet EPA's definition of such a population (i.e. the minority population percentage of the affected area is not greater than the minority population percentage in the general population). Existing environmental health hazards could be present at both sites, including PCBs, asbestos and lead-based paint in older existing buildings. A landfill is also located approximately 1,000 feet from the western boundary of the Talaris site; however, there is minimal potential for migration of methane to the site from the landfill.

Construction under Alternatives 1, 2 and 3 would eliminate or stabilize health hazards associated with the older buildings at the Fort Lawton or Talaris site. Under all the alternatives, construction activity would result in temporary impacts associated with noise, air quality emissions, etc. These impacts would be similar to other large development projects occurring throughout Seattle and would be carried out in compliance with the City of Seattle Municipal Code. Therefore, the potential for disproportionately high or adverse impacts to minorities or low-income persons during construction would be minimal.

During operation, Alternatives 1, 2 and 3 would include affordable housing, community facilities and/or parks/recreation uses on the Fort Lawton and Talaris sites. No significant environmental justice-related impacts are expected from operation of these uses. The affordable housing provided under Alternative 1 at the Fort Lawton site, and under Alternatives 2 and 3 at the Talaris site could be considered a positive impact relative to diversifying neighborhoods that are disproportionately occupied by medium to higher income households.

Methodology

Analysis in this section is largely based on census data (2011-2015, American Community Survey, 5-year estimates), local school district information (www.greatschools.org), and review of other environmental elements evaluated in this EIS (air quality, noise, transportation, etc.).

Background

According to the U.S. Environmental Protection Agency (EPA), environmental justice is:

“the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies. Fair treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies. Meaningful involvement means that: 1. People have an opportunity to participate in decisions about activities that may affect their environment and/or health; 2. The public’s contribution can influence the regulatory agency’s decision-making process; 3. Community concerns will be considered in the decision-making process; and 4. Decision-makers seek out and facilitate the involvement of those potentially affected.”¹

According to the EPA, “low-income population” means any readily identifiable group of low-income persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by the proposed policy or activity.

According to the EPA, a “minority population” is considered to be present if the minority population percentage of the affected area is greater than the minority population percentage in the general population or other appropriate unit of geographic analysis (census tracts are generally considered appropriate).

Disproportionately high and adverse effect means that an adverse effect is predominantly borne by a minority population and/or a low-income population and that the effect that will be suffered by the minority population and/or low-income population is appreciably more severe or greater in magnitude than that borne by the rest of the population.

3.14.1 Affected Environment

This sub-section describes existing environmental justice-related conditions and near the Fort Lawton and Talaris sites, including the potential presence and composition of minority and low-income populations and health and safety risks.

Fort Lawton Site

The Fort Lawton site is located in Seattle’s Magnolia neighborhood. Land uses in the Fort Lawton vicinity largely include single- and multi-family residential and park uses (Discovery Park and Kiwanis Memorial Preserve Park). There are no current land uses that pose an environmental health risk, such as gas stations or dry cleaners, in the immediate vicinity of the site (see Section 3.6, **Land Use**, and Section 3.5, **Environmental Health**, for details).

The site and site area are part of the former Fort Lawton military base. The base was active through World Wars I and II, the Korean War and into the Vietnam War. In 1968, the U.S. Army transferred much of the base site to the city of Seattle. Approximately 46 acres was

¹ EPA. <https://www.epa.gov/environmentaljustice/learn-about-environmental-justice>. Accessed June 2017.

retained by the U.S. Army and used as a Reserve Center. About 34 acres of the Reserve Center, and the subject of this EIS, is currently closed, vacant and in caretaker status by the U.S. Army. Due to the age of the buildings remaining onsite, asbestos containing materials (ACM), lead-based paint (LBP) and polychlorinated biphenyls (PCBs) may be present in some of the buildings. Other past activities and facilities associated with the former military base could also have resulted in the release of contaminants to the soil and groundwater. However, past studies indicate that no environmental conditions have been found and no further action is recommended on the site (see Section 3.5, **Environmental Health**, for details).

Population and Income

There are no active uses and no residents on the Fort Lawton site at present. As shown in **Table 3.13-2** in Section 3.13, **Housing and Socioeconomics**, the vicinity contains lower percentages of minorities as compared to the overall percentages in the city of Seattle. The city of Seattle's population is roughly 30.5% minority, while approximately 18.5% of residents in the Fort Lawton vicinity are minorities (see Section 3.13, **Housing and Socioeconomics**, for details.)

The vicinity has a higher median household income (\$90,951 in Census Tract 57 and \$66,563 in Census Tract 58.01) compared to the city of Seattle's median household income of \$70,594 (2011-2015 ACS Survey). The Fort Lawton vicinity is defined as the Census Tracts in which the site is located (Census Tract 57) and the Census Tract to the east (Census Tract 58.01) (see **Figure 3.13-1** and Section 3.13, **Housing and Socioeconomics**, for details).

Elementary School Characteristics

Table 3.14-1 presents the characteristics of the public elementary school that currently serves the project area: Lawton Elementary. As shown, Lawton Elementary serves a lower percentage of minority students than the district and state averages (approximately 28% versus the Seattle Public School District average of 51.5% and the state average of 42%). Approximately 11% of the students attending Lawton Elementary are characterized as low-income and participate in free or reduced-price lunch programs compared to 33.6% of students citywide.

**Table 3.14-1
ELEMENTARY SCHOOL CHARACTERISTICS**

Parameter	Lawton Elementary School	Seattle Public Schools (K-5)	State Average
White	72%	48.5%	58%
African American	2%	14.1%	5%
Asian or Asian/Pacific Islander	6%	12.0%	7%
Two or more races	13%	12.7%	7%
Hispanic	7%	11.9%	21%
American Indian/Alaska Native	>1%	0.42%	1%
Hawaiian Native/Pacific Islander	>1%	0.37%	1%
Students Participating in Free or Reduced-Price Lunch Program / Students from Low-income Families	11%	33.6%	N/A

Source: www.greatschools.org, accessed October 2017 and <http://www.seattleschools.org>, accessed September 2017.

Environmental Health and Safety Risks to Children

On April 21, 1997, Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, was issued, directing federal agencies to ensure that its policies, programs, activities and standards address disproportionate risks to children that result from environmental health risks or safety risks. The Order recognizes that children may disproportionately suffer from environmental health and safety risks, due to the developing neurological, immunological, digestive and other bodily systems of children. Young children are particularly at higher risks for exposure to LBP and lead contaminated soils because of their behavioral traits. Therefore, to the extent permitted by law and regulations, and consistent with the agency's mission, federal agencies were directed to (1) identify and assess environmental health and safety risks that may disproportionately affect children and (2) ensure that the agency's policies, programs and standards address disproportionate health risks to children that result from environmental health or safety risks. Examples of risks to children could include increased traffic volumes and industrial or production-oriented activities that would generate substances or pollutants children may come into contact with or ingest. Although the proposal evaluated in this DEIS is not currently associated with a federal approvals or agencies, disproportionate risks to children are considered in the event that federal agencies are involved in the future.

In the Fort Lawton vicinity, there are at least three childcare centers within one mile of the site (one south of the site on Emerson Street, the second one mile east of the site and the third less than a mile southeast of the site). Additionally, the site is surrounded by Discovery Park and the Magnolia single-family residential area.

Talaris Site

The Talaris site is located in Seattle's Laurelhurst neighborhood. Land uses in the Talaris vicinity largely include commercial, institutional and residential uses along NE 45th Street to the north, and residential uses to the east, south and west. There is an abandoned landfill (Montlake Landfill) located to the west of the Talaris site. No landfill deposits underlie the project site, and past studies indicate that there is a low probability of methane migrating from the abandoned landfill onto the site.² Given the age of the buildings on-site, there is a potential for ACM, LBP and PCB ballasts or other equipment to be present (see Section 3.8, **Land Use**, and Section 3.5, **Environmental Health**, for details).

Population and Income

There are no active residential uses on the Talaris site at present; the site is used as a conference center and contains temporary lodging facilities (a hotel). As shown in **Table 3.13-7** in Section, 3.13, **Housing and Socioeconomics**, the vicinity contains lower percentages of minorities compared to the overall percentages in the city of Seattle. The City's population is roughly 30.5% minority, while approximately 16.5% of residents in the Talaris vicinity are minorities.

The vicinity has a much higher median household income (\$132,917) compared to the city of Seattle's median household income of \$70,594 (2011-2015 ACS Survey). The vicinity is defined as the Census Tracts in which the site is located (Census Tract 41) (see Section 3.13, **Housing and Socioeconomics**, for details).

Elementary School Characteristics

Table 3.14-2 presents characteristics of the public elementary school that currently serves the project area: Laurelhurst Elementary. As shown, Laurelhurst Elementary serves a lower percentage of minority students than the Seattle Public Schools district and state-wide average (approximately 28% versus the district average of 51.5% and the state average of 42%). Approximately 17% of the students attending Laurelhurst Elementary are characterized as low-income and participate in free or reduced-price lunch programs, as compared to 33.6% of K-5 students district-wide.

Environmental Health Risks and Safety Risks to Children

In the Talaris vicinity, there are at least three childcare centers within one mile of the site (located to the east). Additionally, the Talaris Site is surrounded by the Laurelhurst single-family residential area; Seattle Children's Research Hospital is located to the north and Laurelhurst Park is located approximately one quarter mile to the east.

² Shannon & Wilson, Inc., Geotechnical Report (October 2013).

**Table 3.14-2
ELEMENTARY SCHOOL CHARACTERISTICS**

Parameter	Laurelhurst Elementary School	Seattle Public Schools (K-5)	State Average
White	72%	48.5%	58%
African American	4%	14.1%	5%
Asian or Asian/Pacific Islander	11%	12.0%	7%
Two or more races	9%	12.7%	7%
Hispanic	4%	11.9%	21%
American Indian/Alaska Native	<1%	0.42%	1%
Hawaiian Native/Pacific Islander	<1%	0.37%	1%
Students Participating in Free or Reduced-Price Lunch Program / Students from Low-income Families	17%	33.6%	N/A

Source: www.greatschools.org, accessed October 2017 and <http://www.seattleschools.org>, accessed September 2017.

3.14.2 Impacts

An analysis of the potential environmental justice impacts of Alternative 1, the Applicant's Preferred Alternative, is provided below. For EIS Alternatives 2 and 3, the analyses are less detailed and any differences between the alternatives and the Preferred Alternative are highlighted (other aspects of these alternatives are expected to be similar to the Preferred Alternative).

Meaningful Involvement

An important component of ensuring environmental justice requires that decision-makers afford potentially affected people (in this case, future project residents and other community stakeholders) the opportunity to participate in and influence decisions that may affect their environment and/or health. Decision-makers should facilitate participation, and consider stakeholder input in their decision-making process. This type of participation is termed 'meaningful involvement'.³

The city of Seattle has been engaging the community in the ongoing redevelopment planning for the Fort Lawton project and is engaging the community in the State Environmental Policy Act (SEPA) review process for the project to ensure meaningful involvement. On June 5, 2017, the City issued a Determination of Significance (DS) and Request for Comments on the Scope of the EIS being prepared on the project. The DS indicated that there would be a 21-day EIS scoping period, and that a public meeting would be held at the Daybreak Star Cultural Center in the Magnolia neighborhood during the scoping period. Based on feedback from residents, a second public meeting was held at the

³ EPA. Environmental Justice. <http://www.epa.gov/environmentaljustice/basics/index.html>.

Magnolia Community Center, also in the Magnolia neighborhood. Meeting attendees could provide oral or written comments on the scope of the EIS. The public was also invited to submit written or email comments during the EIS scoping period. Scoping comments were used to refine and inform the alternatives and analysis provided in this EIS (see **Appendix A** for the Summary of the Public Scoping Process).

The opportunity for further public engagement will occur during a 45-day comment period following issuance of this DEIS. A public meeting will be held during the comment period on January 9th, 2018 at the Magnolia United Church of Christ (see the **Fact Sheet** for details). Meeting attendees can provide oral or written comments on the DEIS at the meeting. The public are also invited to submit written or email comments during the DEIS comment period. Responses to the DEIS comments will be provided in the FEIS.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Applicant’s Preferred Alternative)

Under Alternative 1, assumed development would feature a mix of affordable housing on the Fort Lawton site, including affordable rental and ownership and formerly homeless housing. Approximately 238 housing units would be provided on the site. Public park uses would also be provided, including active park facilities, preserved existing natural areas and the conversion of an existing structure to a park maintenance facility. No development is assumed on the Talaris site.

Fort Lawton Site

Construction

During construction for Alternative 1, temporary noise from demolition, site preparation and construction of infrastructure and buildings could affect nearby populations. Construction activities would be subject to applicable city of Seattle noise limits, and noise mitigation measures would be implemented to reduce the extent to which people are affected by construction noise. Overall, the temporary nature of construction coupled with restriction to daytime hours and the implementation of noise mitigation measures would minimize the potential for significant noise impacts from construction activities and equipment, and no significant impacts are expected (see Section 3.4, **Noise**, for details).

Construction activities also could affect air quality due to emissions from construction-related sources and equipment and dust from construction activities including grading, cutting and filling. Some construction phases could also cause odors, particularly during paving operations using tar and asphalt. Construction contractors would be required to comply with regulations requiring that reasonable precautions be taken to minimize dust emissions and prohibiting air contaminants in quantities likely to be injurious to human health, plant or animal life or property, or which unreasonably would interfere with enjoyment of life and property. Overall, with implementation of the controls required for the various aspects of construction activities and consistent use of best management

practices to minimize on-site emissions, construction is not expected to significantly impact air quality (see Section 3.3, **Air Quality**, for details).

Prior to redevelopment activities, additional characterization, removal and proper disposal of contaminants or hazardous materials (i.e., LBP, ACM, PCBs) would occur in buildings to be demolished. Abatement activities would adhere to applicable regulations regarding handling of hazardous and contaminated materials as well as conventional dust control measures to minimize the exposure of the immediately surrounding populations and no significant impacts are expected (see Section 3.5, **Environmental Health**, for details).

The construction site could also create an attractive nuisance, resulting in safety impacts, during redevelopment. However, the areas of the site undergoing construction would be secured and made non-accessible after-hours to avoid this potential safety issue.

Overall, the type of construction activity and impacts that would occur onsite under Alternative 1 would be similar in nature to other large development projects occurring throughout the City and would be carried out in compliance with the city of Seattle Municipal Code. Very few low-income or minority populations are located in the Fort Lawton vicinity and the minority populations that do, do not meet EPA's definition of such a population. Therefore, the potential for disproportionately high or adverse impacts to such communities or persons during construction--impacts appreciably more severe or greater in magnitude than that borne by the community at large, in this case the city of Seattle--would be minimal.

Significant environmental health or safety risks to children in the vicinity, including from increased traffic volumes during construction, are not anticipated (see Section 3.10, **Transportation**, for details).

Operation

Site

Redevelopment of the Fort Lawton site under Alternative 1 would introduce a low-income community on the site. The following evaluates environmental justice-related public health impacts that could occur with operation of the project.

Redevelopment of the site under this alternative would eliminate site-related health hazards associated with the older buildings onsite. Specifically, demolition and redevelopment would include removal and proper disposal of LBP, ACM and PCBs that are present or suspected to be present in many of the existing buildings (see Section 3.5, **Environmental Health**, for details).

No significant noise impacts are expected during operation of the project under Alternative 1 (i.e., due to increased traffic on area roadways or due to heating, venting and air-

conditioning and mechanical equipment associated with new buildings) (see Section 3.4, **Noise**, for details).

Similar to noise, no significant air quality impacts are expected during operation of the project under Alternatives 1 (i.e., due to increased traffic on area roadways) (see Section 3.3, **Air Quality**, for details).

Fort Lawton Vicinity

As noted previously, very few low-income or minority populations are located in the Fort Lawton vicinity, and the minority populations that do, do not meet EPA's definition of such a population. Therefore, the potential for disproportionately high or adverse impacts to such communities or persons during operation of the project under Alternative 1 would be minimal. Development of affordable housing and park uses on the Fort Lawton site is also not expected to result in environmental health or safety risks to children present within the vicinity. Existing environmental health hazards (i.e., LBP, ACM and PCBs) would be removed and properly disposed of, and no operational noise or air quality impacts are anticipated. Traffic would increase in the vicinity, and it is statistically possible that the number of collisions could increase. However, historical collision data show that there are no existing safety issues in the vicinity and Alternative 1 is not expected to result in new safety issues in the neighborhood (see Section 3.10, **Transportation**, for details).

The affordable housing provided onsite under Alternative 1 could be considered a positive impact relative to diversifying a neighborhood that is disproportionately occupied by medium to higher income households. The Magnolia neighborhood is generally an area with high housing costs, and providing affordable housing in such a neighborhood would contribute towards satisfying the City's goal of achieving a mix of housing types that provide opportunity and choice throughout Seattle for people of various ages, races, ethnicities, and cultural backgrounds and for a variety of household sizes, types and incomes.⁴ As noted in **Chapter 2**, Magnolia is among the neighborhoods that used restrictive covenants in the past and has remained a relatively exclusive neighborhood with little to no access to affordable housing choices for those with low-incomes.

Talaris Site

Under Alternative 1 the Talaris site would not be redeveloped and no environmental justice impacts would be expected.

Alternative 2 – Market-rate Housing Onsite; Affordable/Homeless Housing Offsite

Under Alternative 2, the Fort Lawton site would be developed as market-rate single-family residences, and the development of affordable and formerly homeless housing would occur on the Talaris site. Approximately 113 market-rate houses would be developed on the Fort

⁴ *Seattle 2035 Comprehensive Plan*, Housing, November 2016, p. 100.

Lawton site and approximately 238 affordable housing units and associated community facilities would be developed on the Talaris site. No active or passive public park areas would be provided on the Fort Lawton site under Alternative 2.

Fort Lawton Site

Construction

Construction impacts would be similar to Alternative 1 and would include temporary impacts from demolition, site preparation and construction of infrastructure and buildings. Construction activities would be subject to applicable city of Seattle noise limits, and noise and air quality mitigation measures would be implemented. Overall, the temporary nature of construction coupled with restriction to daytime hours and the implementation of mitigation measures, would minimize the potential for impacts. As noted for Alternative 1, very few low-income or minority populations are located in the Fort Lawton vicinity and the minority populations that do, do not meet EPA's definition of such a population. Therefore, the potential for disproportionately high or adverse impacts to such communities or persons during construction would be minimal. Significant environmental health or safety risks to children, including from increased traffic volumes during construction, are also not anticipated (see Section 3.10, **Transportation**, for details).

Operation

Site

Redevelopment of the Fort Lawton site under Alternative 2 would introduce market-rate single-family residences on the site. As such, no readily identifiable group of low-income persons would be directly affected by the proposed project. The homes would likely be designed and constructed to be marketed to high-income buyers. The average sale price is estimated at \$1.5 million, which is comparable based on listings for new construction single-family in the Magnolia neighborhood.⁵ Existing neighborhood demographic trends are expected to continue, with lower percentages of minorities anticipated to live in the new market-rate housing compared to the City overall. Therefore, no positive environmental justice related-impacts are anticipated.

Vicinity

As noted previously, very few low-income or minority populations are located in the vicinity and the minority populations that do, do not meet EPA's definition of such a population. Therefore, the potential for disproportionately high or adverse impacts to such communities or persons during operation of the project under Alternative 2 would be minimal. Development of market-rate housing on the Fort Lawton site is not expected to result in environmental health or safety risks to children present within the vicinity. Existing environmental health hazards (i.e., LBP, ACM and PCBs.) would be removed and properly disposed of, and no operational noise or air quality impacts are anticipated. Traffic would

⁵ Zillow, November 2017. https://www.zillow.com/homes/Magnolia-Seattle-WA_rb/

increase in the vicinity, and it is statistically possible that the number of collisions could increase. However, historical collision data show that there are no existing safety issues in the vicinity and Alternative 2 is not expected to result in new safety issues in the neighborhood (see Section 3.10, **Transportation**, for details).

Talaris Site

Construction

Construction impacts on the Talaris site would be similar to Alternative 1 and would include temporary impacts from site preparation and construction of infrastructure and buildings. No buildings would be demolished and removed; however, some of the buildings that could contain LBP, ACM and PCBs would be renovated. Surveys for these hazardous would be conducted prior to renovation and remodeling activities; and hazardous materials would be remediated and disposed of in accordance with applicable regulations if discovered. Construction activities would be subject to applicable city of Seattle noise limits, and noise and air quality mitigation measures would be implemented. It is unlikely that methane is migrating from the abandoned landfill onto the Talaris site. Therefore, proposed construction would not release this gas and no special measures would be needed to address methane migration with proposed development under Alternative 2. Overall, the temporary nature of construction coupled with restriction to daytime hours and the implementation of mitigation measures would minimize the potential for impacts. As noted for Alternative 1, very few low-income or minority populations are located in the Laurelhurst vicinity and the minority populations that do, do not meet EPA's definition of such a population. Therefore, the potential for disproportionately high or adverse impacts to such communities or persons would be minimal. Significant environmental health or safety risks to children in the vicinity, including from increased traffic volumes during construction, are not anticipated (see Section 3.10, **Transportation**, for details).

Operation

Site

Redevelopment of the Talaris site under Alternative 2 would introduce a low-income community on the site. As mentioned above, redevelopment of the site under Alternative 2 would include renovation of buildings that could contain LBP, ACM and PCBs. Surveys for these hazardous materials would be conducted prior to renovation activities; hazardous materials would be remediated and disposed of in accordance with applicable regulations if discovered. Therefore, no hazardous conditions would remain during operation of the project (see Section 3.5, **Environmental Health**, for details).

No significant noise impacts are expected with operation under Alternative 2 (i.e., due to increased traffic on area roadways or due to heating, venting and air-conditioning and mechanical equipment associated with new buildings) (see Section 3.4, **Noise**, for details).

No significant air quality impacts are expected with operation under Alternative 2 (i.e., due to increased traffic on area roadways) (see Section 3.3, **Air Quality**, for details).

Development of low-income housing on the site would not be expected to result in significant environmental health or safety risks to children that would visit and use these facilities/amenities. Alternative 2 would not change the roadway network onsite and no safety impacts are anticipated.

Vicinity

As noted previously, very few low-income or minority populations are located in the vicinity and the minority populations that do, do not meet EPA's definition of such a population. Therefore, the potential for disproportionately high or adverse impacts to such communities or persons would be minimal. Development of a low-income community on the Talaris site is not expected to result in environmental health or safety risks to children present within the vicinity. As noted previously, existing environmental health hazards (i.e., LBP, ACM and PCBs.) would be remediated, and no operational noise or air quality impacts are anticipated. Traffic would increase in the vicinity, and it is statistically possible that the number of collisions could increase. However, historical collision data show that there are no existing safety issues in the vicinity and Alternative 2 is not expected to result in new safety issues in the neighborhood (see Section 3.10, **Transportation**, for details).

The affordable housing provided onsite under Alternative 2 could be considered a positive impact relative to diversifying the Laurelhurst neighborhood, which is disproportionately occupied by higher income households. Providing affordable housing on the Talaris site would help address the City's goal of achieving a mix of housing types that provide opportunity and choice throughout Seattle for people of various ages, races, ethnicities, and cultural backgrounds and for a variety of household sizes, types and incomes.⁶ As noted in **Chapter 2**, Laurelhurst is among the neighborhoods that used restrictive covenants in the past and has remained a relatively exclusive neighborhood with little to no access to affordable housing choices for those with low-incomes.

Alternative 3 – Public Park Uses Onsite; Affordable/Homeless Housing Offsite

Under Alternative 3, the entire Fort Lawton site would be developed as a public park, including passive and active recreation areas. Approximately 238 affordable housing units and associated community facilities would be developed on the Talaris site.

Fort Lawton Site

Construction

Development of new park uses on the Fort Lawton site would result in temporary impacts from demolition, site preparation and construction of infrastructure and buildings.

⁶ *Seattle 2035 Comprehensive Plan*, Housing, November 2016, p. 100.

Construction-related impacts would include additional amounts of air pollution due to dust and emissions from construction equipment and vehicles; increased noise levels from construction activities; vibration associated with construction activities and vehicle movement; and increased traffic associated with construction vehicles and construction workers. Overall, construction-related impacts to off-site and on-site populations would be temporary in nature and are anticipated to be less than under Alternative 1. Therefore, the potential for disproportionately high or adverse impacts to low-income or minority communities or individuals would be minimal.

Operation

Site

Redevelopment of the Fort Lawton site under Alternative 3 would introduce park and open space uses on the site. Redevelopment would eliminate site-related health hazards that are associated with Fort Lawton's older buildings. Specifically, demolition and redevelopment would include removal and proper disposal of LBP, ACMs and PCBs that are present or suspected to be present in many of the existing buildings, like under Alternative 1 (see Section 3.5, **Environmental Health**, for details). No significant noise or air quality impacts are expected to result with operation under Alternative 3 (i.e., due to increased traffic) (see Section 3.3, **Air Quality**, and Section 3.4, **Noise**, for details).

Development of park and open space uses on the Fort Lawton site are not expected to result in significant environmental health or safety risks to children that would visit and use these facilities/amenities. Alternative 3 would change the roadway network onsite; however, no safety impacts are anticipated.

Vicinity

As noted previously, very few low-income or minority populations are located in the vicinity and the minority populations that do, do not meet EPA's definition of such a population. Therefore, the potential for disproportionately high or adverse impacts to such communities or persons with operation of the project under Alternative 3 would be minimal. Development of park and open space uses on the Fort Lawton site also would not be expected to result in environmental health or safety risks to children present within the vicinity. As noted previously, existing environmental health hazards (i.e., LBP, ACM and PCBs) would be removed and properly disposed of, and no operational noise or air quality impacts are anticipated. Traffic would increase in the vicinity, and it is statistically possible that the number of collisions could increase. However, historical collision data show that there are no existing safety issues in the vicinity and Alternative 3 is not expected to result in new safety issues in the neighborhood (see Section 3.10, **Transportation**, for details).

Talaris Site

Development of affordable and formerly homeless housing on the Talaris site would be the same as described under Alternative 2 and potential environmental justice impacts would also be the same.

Alternative 4 - No Action Alternative

Under the No Action Alternative, the Fort Lawton site would remain in its existing vacant condition. The property would not be conveyed by the U.S. Army to the city of Seattle per the BRAC process and used for affordable housing and public park uses. The City would terminate its lease of the property and the Army would resume maintenance of the site and facilities. Buildings and infrastructure would likely continue to deteriorate, and hazardous materials associated with the buildings would not be removed or properly disposed of at this time. The Talaris site would also remain in its existing condition and no new affordable housing would occur on the site at this time. It is anticipated that no disproportionately high or adverse impacts to low-income or minority populations would result under Alternative 4. The opportunity to provide affordable housing in the Magnolia or Laurelhurst neighborhoods, and the positive impacts of diversifying a neighborhood that is disproportionately occupied by higher income households, would not be realized.

3.14.3 Mitigation Measures

Although no significant environmental justice related impacts have been identified, the following measures would minimize related impacts. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts, but are not necessary to mitigate significant impacts.

Legally-Required Measures

- All construction activities would be required to comply with city of Seattle Municipal Code regulations related to air quality and noise.
- Abatement, remediation, and disposal of any hazardous materials on site would occur in accordance with local, state, and federal regulations prior to start of construction or demolition activities on site.

Measures Proposed as Part of Project

- The areas of the site undergoing construction would be secured and non-accessible after hours to prevent the creation of an attractive nuisance that could result in safety/public health impacts to the residential populations near the site.

3.14.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse environmental justice impacts are anticipated.

Chapter 4

Acronyms and Definitions

CHAPTER 4

ACRONYMS AND DEFINITIONS

ACM	Asbestos Containing Materials
ACS	American Community Survey
ADA	Americans with Disabilities Act
AFH	Assessment of Fair Housing
ALS	Advanced Life Support
AMI	Area Median Income
AMSA	Area Maintenance Support Activity
AP	Analytic Period
APE	Area of Potential Effects
AST	Aboveground Storage Tank
bgs	Beneath Ground Surface
BINMIC	Ballard/Interbay Northend Manufacturing & Industrial Center
BLS	Basic Life Support
BMP	Best Management Practices
BRAC	Base Realignment and Closure
CAD	Computer Aided Dispatch
CFR	Code of Federal Regulations
CO	Carbon monoxide
CO ₂	Carbon dioxide
CO ₂ e	Equivalent amount of carbon dioxide
CPP	Countywide Planning Policies
CSECP	Construction Stormwater Erosion Control Plan
CWA	Clean Water Act
CZMP	Coastal Zone Management Program
DAHP	Department of Archaeology and Historic Preservation
dba	A-weighted decibel
DEIS	Draft Environmental Impact Statement
DNR	Department of Natural Resources
EFSEC	Energy Facility Site Evaluation Council
EMS	Emergency Medical Services
EPA	Environmental Protection Agency
ESA	Endangered Species Act
ESDS	Evergreen Sustainable Development Standards
EIS	Environmental Impact Statement
FEIS	Final Environmental Impact Statement
FLARC	Fort Lawton Army Reserve Complex
FWHCA	Fish and Wildlife Habitat Conservation Area
FONSI	Finding of No Significant Impact
GHG	Greenhouse Gas
GMA	Growth Management Act

HUD	Housing and Urban Development
IBC	International Building Code
ITE	Institute of Transportation Engineers
LBP	Lead-Based Paint
Leq	Equivalent Sound Level
LOS	Level of Service
LRA	Local Redevelopment Authority
MBTA	Migratory Bird Treaty Act
MRS	Munitions Response Site
MTCA	Model Toxic Control Act
MUTCD	<i>Manual on Uniform Traffic Control Devices</i>
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanographic and Atmospheric Administration
NO _x	Nitrogen oxide
NO ₂	Nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O ₃	Ozone
OMS	Organizational Maintenance Shop
ORMA	Ocean Resource Management Act
PCB	Polychlorinated biphenyls
PSCAA	Puget Sound Clean Air Agency
PM _{2.5}	Particulate matter less than or equal to 2.5 micrometers in size
PM ₁₀	Particulate matter less than or equal to 10 micrometers in size
PSE	Puget Sound Energy
PSRC	Puget Sound Regional Council
Q1	Queen Sector and Beat 1
SEPA	State Environmental Policy Act
SFD	Seattle Fire Department
SHA	Seattle Housing Authority
SMA	Shoreline Management Act
SO _x	Sulfur oxide
SP	Spill Plan
SPD	Seattle Police Department
SPR	Seattle Parks and Recreation
SPS	Seattle Public Schools
SPU	Seattle Public Utilities
SWPPP	Stormwater Pollution Prevention Plan
TSCA	Toxic Substances Control Act
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tanks
VA	Veterans Administration
VOC	Volatile Organic Compound
WAAQS	Washington State Ambient Air Quality

WSDOT	Washington State Department of Transportation
WTD	Wastewater Treatment Division
WDFW	Washington State Department of Fish and Wildlife
WHR	Washington Heritage Register

Chapter 5

References

CHAPTER 5

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Chapter 6

Distribution List

CHAPTER 6

DISTRIBUTION LIST

Tribes

Duwamish Tribe
Muckleshoot Tribe, Fisheries Division
Snoqualmie Tribe
Stillaguamish Tribe
Suquamish Tribe
Tulalip Indian Tribe

Federal Agencies

U.S. Army Base Transition Coordinator
U.S. Army BRAC Environmental Coordinator
U.S. Army Corps of Engineers
U.S. Army Department of Veterans Affairs
U.S. Department of Housing and Urban Development

State Agencies

Washington State Department of Archaeology and Historic Preservation
Washington State Department of Ecology, Environmental Review Section
Washington State Department of Fish and Wildlife
Washington State Department of Health, Environmental Health Division
Washington State Department of Natural Resources
Washington State Department of Transportation, Northwest Division

Local Agencies

King County Metro, Real Estate/Land Use/Environmental Planning
King County Wastewater Treatment Division, Environmental Planning
Public Health Seattle & King County, Environmental Health Division
Seattle City Light
Port of Seattle, Environmental Management
Puget Sound Clean Air Agency
Seattle Public Schools