

***Draft Supplemental Environmental
Impact Statement***

Prepared for

**Fort Lawton Army Reserve
Center Redevelopment
Update Project**

Prepared by the City of Seattle



April 22, 2025



April 22nd, 2025

Dear Affected Agencies, Tribes, Organizations and Interested Parties:

Enclosed is the Draft Supplemental Environmental Impact Statement (DSEIS) for the proposed Fort Lawton Army Reserve Center Redevelopment Project. The DSEIS analyzes the probable adverse environmental impacts associated with the proposed development and the No Action Alternative.

The public comment period associated with this DSEIS is:

April 22, 2025 through May 30th, 2025

Agencies, affected tribes, organizations and members of the public are invited to comment on the DSEIS. Methods for presenting your comments are described below. All comments are due no later than May 30th, 2025 and may be submitted:

Via email : OH_Comments@seattle.gov

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

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

- **Meeting location:** Daybreak Star Indian Cultural Center - [5011 Bernie Whitebear Way, Seattle, WA 98199](#)
- **Meeting Date/Time:** May 21st, 2025, 6-8pm

Following the DSEIS comment period, the Seattle Office of Housing will prepare a Final SEIS (FSEIS) that addresses comments received during the DSEIS public comment period.

Copies of the DSEIS have been distributed to agencies noted on the Distribution List of this DSEIS (Appendix A). The DSEIS can be reviewed at the Seattle Office of Housing (Seattle Municipal Tower, 700 5th Ave., Suite 5700) and online at [Fort Lawton Redevelopment - Housing | seattle.gov](#).

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

Sincerely,

Maiko Winkler-Chin, Director of the Office of Housing

FACT SHEET

Name of Project Fort Lawton Army Reserve Center
Redevelopment Update 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.

SEPA environmental review for the *Fort Lawton Army Reserve Center Redevelopment Project* was accomplished by the Seattle Office of Housing via the *2018 Fort Lawton Army Reserve Center Redevelopment Project Draft EIS* (December 14, 2017) and Final EIS (March 29, 2018). This Supplemental EIS supplements the *2018 Fort Lawton Army Reserve Center Redevelopment Project Draft EIS*.

SEIS 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, a Supplemental EIS is required, per RCW 43.21C.030(2)(c).

Proposed Actions

- City Council approval of the updated redevelopment plan; and,
- Council authorization of public property conveyances from the Army to the City of Seattle, including conveyance and/or ground lease agreements for parcels designated for housing development.

EIS Alternatives

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Updated Proposed Action):

Development of a mix of affordable housing onsite, including homeless and affordable rental and ownership housing. 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; and,

Alternative 2 – No Action Alternative: No redevelopment of the site at this time; existing structures onsite would be maintained.

Lead Agency SEPA Responsible Official

Maiko Winkler-Chin, Director
Seattle Office of Housing
PO Box 94725
Seattle, WA 98124-4725

SEIS Contact Person

Jessica Gomez, Strategic Advisor for Policy and Planning
Seattle Office of Housing
PO Box 94725
Seattle, WA 98124-4725

Telephone: 206.684.5081
Email: Jessica.gomez@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 Updated Proposed Action). Additional permits/approvals may be identified during the review process associated with the specific development projects.

City of Seattle Permits and Approvals:

- City Council approval of the updated redevelopment plan; and,
- Council authorization of public property conveyances from the Army to the City of Seattle, including conveyance and/or ground

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.

lease agreements for parcels designated for housing development.

Federal and/or State Permits and Approvals:

- 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

SEIS 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

Facet

- Biological Resources, Visual Simulation

Landau Associates

- Earth, Air Quality and Noise

Cultural Resource Consultants, Inc.

- Historic and Cultural Resources

Heffron Transportation

- Transportation

MIG

- Utilities

Location of Background Information

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

EA Engineering, Science and Technology, Inc., PBC
600 Stewart Street, Suite 800
Seattle, WA 98101

Seattle Office of Housing
Jessica Gomez
Seattle Municipal Tower
700 5th Avenue, #5800
Seattle, WA 98124-4725
Telephone: 206.684.5081
Email: Jessica.gomez@seattle.gov

Date of Issuance of this DSEIS

April 22, 2025

Date DSEIS Comments Are Due

May 30, 2025

Written comments may be submitted to:

Mail:

Jessica Gomez
Office of Housing
PO Box 94725
Seattle, WA 98124-4725

Telephone: 206.684.5081

Email: OH_Comments@seattle.gov

Date of DSEIS Public Meeting

A public meeting on this DSEIS is scheduled for **Wednesday, May 21st**, at 6 PM at:

**Daybreak Star Indian Cultural Center
5011 Bernie Whitebear Way
Seattle, WA 98199**

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 DSEIS*.

Availability of this DSEIS

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

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

The DSEIS can be reviewed and downloaded online at:

<https://www.seattle.gov/housing/programs-and-initiatives/fort-lawton-redevelopment>

A limited number of complimentary flash drives of this DSEIS may be obtained from the Office of Housing while the supply lasts. Additional flash drives may be purchased for the cost of reproduction.

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DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

for the

Fort Lawton Army Reserve Center Redevelopment Update Project

City of Seattle

The Draft Supplemental EIS (Draft SEIS) for the *Fort Lawton Army Reserve Center Redevelopment Update 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 Draft SEIS 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 Draft SEIS. 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 Draft SEIS IssuanceApril 22, 2025

Date Comments are due on the Draft SEIS May 30, 2025

CHAPTER 1

SUMMARY

1.1 INTRODUCTION

This chapter provides a summary of the Draft Supplemental Environmental Impact Statement (Draft SEIS) for the *Fort Lawton Army Reserve Center Redevelopment Update Project*. **Chapter 1** briefly describes the Updated Proposed Action (Alternative 1) and the No Action Alternative (Alternative 2) and contains a comprehensive overview of environmental impacts identified for the Proposed Action and alternatives. Please see **Chapter 2** of this Draft SEIS for a more detailed description of the Updated Proposed Action and alternative and **Chapter 3** for a detailed description of the affected environment, environmental impacts, mitigation measures, and significant unavoidable adverse impacts.

SEPA environmental review for the *Fort Lawton Army Reserve Center Redevelopment Project* was accomplished by the Seattle Office of Housing via the *2018 Fort Lawton Army Reserve Center Redevelopment Project Draft EIS* (December 14, 2017) and Final EIS (March 29, 2018). This Supplemental EIS supplements the *2018 Fort Lawton Army Reserve Center Redevelopment Project Draft EIS*.

The applicant, Seattle Office of Housing (Office of Housing), is proposing an update to the Fort Lawton Army Reserve Center Redevelopment Plan analyzed in the 2018 EIS. The Fort Lawton Army Reserve Center Update is proposed, among other things, to increase the number of affordable housing units on site consistent with existing zoning, and to increase the infrastructure cost efficiency compared to the alternatives analyzed in the 2018 EIS. Accordingly, the Seattle Office of Housing is proposing redevelopment of the Fort Lawton Army Reserve Center site (site), including housing and park uses.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses (Updated Proposed Action)

Development of a mix of affordable housing onsite, including homeless and affordable rental and ownership housing (up to 500 housing units compared to 238 units analyzed in the 2018 EIS). 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 – 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

Base Realignment and Closure (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 zoning.

1.2 IMPACTS, MITIGATION MEASURES AND SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The following highlights the impacts, mitigation measures, and significant unavoidable adverse impacts that would potentially result from the alternatives analyzed in this Draft SEIS. **Table 1-1** summarizes the potential impacts that would be anticipated under the SEIS Alternatives. This summary is not intended to be a substitute for the complete discussion of each element that is contained in **Chapter 3**.

Table 1-1 IMPACT SUMMARY MATRIX

Alternative 1 - Updated Proposed Action	Alternative 2 - No Action Alternative
3.1 – EARTH	3.1 – EARTH
<ul style="list-style-type: none"> A minimal amount of grading and placing/compacting of structural fill would be required (approximately 11,000 CY of soil moved, with no imported or exported fill. 	<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. The site could be conveyed to the City or others and developed consistent with site zoning, with the potential for earth impacts.
<ul style="list-style-type: none"> The potential for impacts from landslides is considered moderately low. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> Impervious surfaces would decrease, with a possible increase in recharge to the aquifer beneath site. 	<ul style="list-style-type: none"> Same as above.
3.2 – BIOLOGICAL RESOURCES	3.2 – BIOLOGICAL RESOURCES
<ul style="list-style-type: none"> Construction equipment activity and noise could potentially disturb wildlife and habitat. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and biological resources would continue as under existing conditions. The site could be conveyed to the City or others and developed consistent with site zoning, with the potential for impacts to biological resources.
<ul style="list-style-type: none"> Existing forested habitat areas would be preserved in the north and south parts of the site. 	<ul style="list-style-type: none"> Same as above
<ul style="list-style-type: none"> No direct impacts to critical areas, vegetation that provides wildlife habitat or sensitive wildlife species is expected. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> 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"> Same as above.
3.3 – AIR QUALITY/GREENHOUSE GAS EMISSIONS	3.3 – AIR QUALITY/GREENHOUSE GAS EMISSIONS
<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"> The site would not be redeveloped at this time, and air quality and GHG conditions would continue as under existing conditions. The site could be conveyed to the City or others and developed consistent with site zoning, with the potential for air and GHG emissions.

Alternative 1 - Updated Proposed Action	Alternative 2 - No Action Alternative
<ul style="list-style-type: none"> Projected average annual GHG emissions are estimated to be 5,693 MTTCO_{2e} per year and would not meet Ecology's threshold for significance. 	<ul style="list-style-type: none"> Same as above.
3.4 – NOISE	3.4 – NOISE
<ul style="list-style-type: none"> Construction activities would be accompanied by temporary increases in noise. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and noise sources would continue as under existing conditions. The site could be conveyed to the City or others and developed consistent with site zoning, with the potential for noise impacts.
<ul style="list-style-type: none"> Estimated increases in traffic-related noise of <1 to 4 dBA could occur. No significant impacts are expected. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> Operational noise under Alternative 1 would be generated by multi-family residential, parks/recreation, 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"> Same as above.
3.5 – ENVIRONMENTAL HEALTH	3.5 – ENVIRONMENTAL HEALTH
<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"> 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.
<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. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Same as above.

Alternative 1 - Updated Proposed Action	Alternative 2 - No Action Alternative
<ul style="list-style-type: none"> Future residential uses could misuse and improperly dispose of household cleaners, yard fertilizers and pesticides, etc. 	<ul style="list-style-type: none"> Same as above.
3.6 – LAND USE/RELATIONSHIP TO PLANS AND POLICIES	3.6 – LAND USE/RELATIONSHIP TO PLANS AND POLICIES
<ul style="list-style-type: none"> Development would include: <ul style="list-style-type: none"> 500 affordable housing units with associated parking; 18.32 acres of passive parks and open space area; and, 4.17 acres of multipurpose field area. 	<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 zoning.
<ul style="list-style-type: none"> 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"> Same as above.
<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. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> 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"> Same as above.
3.7 – AESTHETICS/VISUAL RESOURCES	3.7 – AESTHETICS/VISUAL RESOURCES
<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"> The site would not be redeveloped at this time, and aesthetic, view, light, and glare and shadows would continue as under existing conditions. The site could be conveyed to the City or others and developed consistent with site zoning, with potential for impacts associated with views, glare and shadows.
<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 	<ul style="list-style-type: none"> Same as above.

Alternative 1 - Updated Proposed Action	Alternative 2 - No Action Alternative
<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Same as above.
<ul style="list-style-type: none"> • Glare: Redevelopment would increase glare, including from vehicles and building facades. Significant glare impacts are not expected. 	<ul style="list-style-type: none"> • Same as above.
<ul style="list-style-type: none"> • 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"> • Same as above.
3.8 – RECREATION AND OPEN SPACE	3.8 – RECREATION AND OPEN SPACE
<ul style="list-style-type: none"> • 22.49 acres of public park and open space would be provided, including 18.32 acres for passive recreation and 4.17 acres for active recreation with two multi-purpose fields. Up to 21.44 acres of passive open space, parks support facility, and active recreation area would be dedicated to Discovery Park 	<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. The site could be conveyed to the City or others and developed consistent with site zoning, which could increase park demand and/or include some form of park or open space area.
<ul style="list-style-type: none"> • Based on the estimated number of residents (approximately 1,600 people), there would be demand for park and recreation space within a 10-minute walk from the site. 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"> • Same as above.
3.9 – HISTORIC AND CULTURAL RESOURCES	3.9 – HISTORIC AND CULTURAL RESOURCES
<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. 	<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 site could be conveyed to the City or others and developed consistent with site zoning, with the potential to remove existing buildings, and/or impact the setting of the Fort Lawton Cemetery.
<ul style="list-style-type: none"> • The Fort Lawton Cemetery would not be directly or indirectly (e.g., visually) affected by redevelopment under Alternative 1. 	<ul style="list-style-type: none"> • Same as above.
<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"> • Same as above.
3.10 – TRANSPORTATION	3.10 – TRANSPORTATION

Alternative 1 - Updated Proposed Action	Alternative 2 - No Action Alternative
<ul style="list-style-type: none"> Truck and employee traffic would be generated during construction. The vicinity roadway system would be able to accommodate construction traffic. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and public services would continue as under existing conditions. The site could be conveyed to the City or others and developed consistent with site zoning, with the potential to generate vehicle trips, transit trips and parking demand.
<ul style="list-style-type: none"> Alternative 1 would generate daily vehicle trips at buildout as follows: 2,266 vehicle trips per day, with 183 AM peak hour trips and 189 PM peak hour trips. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> All study area signalized intersections would continue to operate at LOS C or better with slight increases in delay. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> Most of the unsignalized intersections would continue to operate at LOS C or better with the exception of three unsignalized intersections operating at LOS E or F (W Emerson Pl/Gilman Ave. W, W Nickerson St./15th Ave. W, and W Emerson St./W). 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> Proposed parking supply would meet City requirements. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> Although traffic at study area intersections would increase, which would increase the number of collisions, new safety issues are not anticipated. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> Alternative 1 is expected to generate approximately 146 daily transit trips. Existing bus service is expected to accommodate this demand. 	<ul style="list-style-type: none"> Same as above.
3.11 – PUBLIC SERVICES	3.11 – PUBLIC SERVICES
<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"> The site would not be redeveloped at this time, and public services would continue as under existing conditions. The site could be conveyed to the City or others and developed consistent with site zoning, with the potential to generate demands for police, fire and school services.
<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. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> Development could generate approximately 316 new students. It is anticipated that the SPS schools serving the Fort Lawton site would have available capacity to serve new students from the site. 	<ul style="list-style-type: none"> Same as above.
3.12 – UTILITIES	3.12 – UTILITIES

Alternative 1 - Updated Proposed Action	Alternative 2 - No Action Alternative
<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. 	<ul style="list-style-type: none"> The site would not be redeveloped at this time, and utilities would continue as under existing conditions. The site could be conveyed to the City or others and developed consistent with site zoning, with the potential to generate demands on area utilities.
<ul style="list-style-type: none"> The portion of the site covered in impervious surfaces would be less than under existing conditions. A permanent stormwater system would be installed. No significant stormwater impacts are expected. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> Sewage flows and potable water demand from/to the site would increase to approximately 87,500 gallons per day. Seattle Public Utilities (SPU) would continue to provide sewer and water service and has adequate supply and capacity. 	<ul style="list-style-type: none"> Same as above.
3.13 – HOUSING AND SOCIOECONOMICS	3.13 – HOUSING AND SOCIOECONOMICS
<ul style="list-style-type: none"> Residential units onsite would increase from 0 to 500 affordable units with: <ul style="list-style-type: none"> Up to 100 formerly homeless senior/veteran units 200 affordable rentals 200 affordable homeownership units 	<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. 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 zoning, which could include market rate or affordable housing.
<ul style="list-style-type: none"> Density would increase from 0 dwelling units/acre to approximately 15 dwelling units/acre (based on entire site area). 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> The new housing would contribute towards meeting the City’s overall housing plans and targets for affordable housing based on anticipated growth by 2044. The City’s stock of approximately 70,726 existing income-restricted affordable housing units would increase by 0.7%. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> Additional housing units would increase the housing stock in the Fort Lawton vicinity by approx. 7.5%. 	<ul style="list-style-type: none"> Same as above.
<ul style="list-style-type: none"> The permanent on-site residential population would increase from 0 to approximately 1,600 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"> Same as above.
<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 	<ul style="list-style-type: none"> Same as above.

Alternative 1 - Updated Proposed Action	Alternative 2 - No Action Alternative
larger Magnolia neighborhood is expected from the additional affordable housing residents.	
3.14 – ENVIRONMENTAL JUSTICE	3.14 – ENVIRONMENTAL JUSTICE
<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. 	<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. Although some form of site redevelopment could occur in the future, 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 likely not be realized.
<ul style="list-style-type: none"> 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"> Same as above.
<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"> Same as above.

SUMMARY OF MITIGATION MEASURES AND SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

3.1 Earth

Mitigation Measures

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 in the northern and western portions of the site, development adjacent to or within landslide hazard areas, and to determine what structures could be influenced by excavation dewatering.
- As appropriate, deep foundations such as 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. Vibration monitoring would also be conducted with drilled piles.

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

With the implementation of mitigation measures identified above, no significant unavoidable adverse earth-related impacts are anticipated.

3.2 Biological Resources

Mitigation Measures

Legally-Required Measures

- Delineate, survey, and rate wetlands to determine required buffers per SMC 25.09.160, and ensure compliance with applicable regulations.
- If required by the City of Seattle, develop a great blue heron management plan for Fort Lawton site per DPD Directors Rule 5-2007 and 13-2018, including: that any clearing, grading or outside construction would be done outside of the nesting season.
- Identify Tier 1-4 trees in the development areas of the sites per SMC Chapter 25.11 and implement tree protection and replacement measures, as applicable.
- Install temporary and permanent stormwater control systems to limit water quality impacts on downstream resources.
- Install temporary fencing at any tree retention areas, ECA buffers, or habitat preservation areas to limit disturbance.

- Comply with any Migratory Bird Treaty Act requirements, and/or avoid or limit vegetation removal and construction activities during the breeding season.
- Coordinate with WDFW when working near nesting habitat associated with known great blue heron breeding areas, as applicable.

Measures Proposed as Part of Project

- Permanent fencing will be constructed at the edge of potential wetland buffer and at edges of habitat areas to discourage intrusions by people and pets.
- Direct lighting away from natural areas, use downcast lighting, and limit or exclude night lighting, where feasible.
- Maintain and monitor mitigation sites and retained/installed trees, as applicable.
- Limit use of fertilizers, pesticides and herbicides in developed areas.

Other Possible Measures

- Consider integrating wildlife habitat features in the project design including but not limited to bird boxes, bat boxes, bird-safe window designs, raptor nest platforms, utilizing native plant species in open space and landscaping design, and leaving open spaces unmoved where feasible, etc.
- Consider installation of interpretive signs or distribution of information on biological resources for public education.

Significant Unavoidable Adverse Impacts

Development of the Updated Proposed Action under Alternative 1 is anticipated to result in minor permanent and temporary impacts to wildlife including the displacement of any animals which occupy the site during construction, and indirect impacts associated with the proposed development. Since the area of open space will increase after construction is complete, the total area of urban wildlife habitat is proposed to improve slightly, and no loss of native habitats will occur. Both Alternative 1 and the No Action Alternative would result in indirect impacts to wildlife due to the proposed use or perpetuation of the current site use. No significant unavoidable adverse biological resources impacts are anticipated under either alternative.

3.3 Air Quality/Greenhouse Gas Emissions

Mitigation Measures

The following measures have been identified to address the potential impacts on air quality and greenhouse gas emissions (GHGs) from construction and operation of Alternative 1. 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*.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 site 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).

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

- Sidewalks under the Updated Proposed Action would be located throughout the site that would provide opportunities for non-motorized circulation and reduce vehicular emissions.
- 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.

3.4 Noise

Mitigation Measures

The following measures have been identified to address the potential noise impacts from construction and operation of the Updated Proposed Action under Alternative 1. 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 the Proposed Alternative would adhere to the regulations in SMC 25.08.425 and SMC 25.08, Subchapter V, respectively.

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;
 - Install muffles on engines;
 - Substitute quieter equipment or construction methods;
 - Minimize operation time for construction equipment;

- 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 the Updated Proposed Action, existing wooded areas in the north, south, and west parts of the Fort Lawton site would be preserved in forest. 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.

3.5 Environmental Health

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 Alternative 1 (Updated Proposed Action). 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 asbestos-containing material (ACM), lead-based paint (LBP) or polychlorinated biphenyls (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 Model Toxics Control Act (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 Stormwater Pollution Prevention Plan (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.

3.6 Land Use/Relationship to Plans and Policies

Mitigation Measures

The following measures have been identified to address the potential land use impacts from construction and operation of the Fort Lawton Update Project. 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.
- New landscaping would be provided on the Fort Lawton 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 Project

- Proposed development would be phased over an approximately seven-year buildout period.
- Proposed housing and active park uses would be focused in the central portions of the site with no direct vehicular connection with the residential areas to the north and east.
- Proposed development would include open space areas on the 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.

Significant Unavoidable Adverse Impacts

Development under Alternative 1 (Updated Proposed Action) would convert the Fort Lawton site from its existing, vacant military storage and maintenance buildings to new residential uses. Development would also include active and passive park uses on the Fort Lawton site. These conversions of uses would result in an intensification of uses and an increase in activity levels on the site. No significant unavoidable adverse land use impacts are anticipated.

3.7 Aesthetics/Visual Resources

Mitigation Measures

The following measures have been identified to address the potential aesthetic impacts from construction and operation of the Updated Fort Lawton Project under SEIS Alternative 1.

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.
- 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

Development under the Updated Proposed Action would change the visual character of the Fort Lawton site to new townhouses 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

Mitigation Measures

The following measures have been identified to address the potential recreation and open space impacts from construction and operation of the Updated Proposed Action under Alternative 1. 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 Updated Proposed Action (Alternative 1)—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

- Approximately 18.32 acres of the site would be provided for passive recreation including 2.92 acres of existing woodland area, 1.93 acres of existing grass area, 2.57 acres of grass area incorporated into the Housing Area, and 10.89 acres of other landscape area.
- Approximately 4.17 acres of the site would be developed for active recreation use, including two unlit grass multipurpose fields.
- Incorporation of approximately 21.44 acres of passive parkland and open space, existing maintenance facility, and active recreation (multi-purpose fields) to Discovery Park

Significant Unavoidable Adverse Impacts

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

3.9 Historic and Cultural Resources

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 Alternative 1. 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

- None of the buildings are recommended eligible for listing as a Seattle Landmark on the WHR, or on the NRHP. Therefore, no mitigation is identified as required for removal of these buildings. However, because proposed development involves impacts to historic aged structures, it is recommended that the structures proposed for removal be referred to the City's Landmark Preservation Board (LPB) for their consideration as a City Landmark (see **Appendix H** for details).
- 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.
- 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).
- 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.

Significant Unavoidable Adverse Impacts

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

3.10 Transportation

Mitigation Measures

Legally-Required Measures

- Development would comply with all land use code requirements regardless of right-of-way improvements including any 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.
- **Implement Transportation Management Plan (TMP)** – The Seattle Office of Housing would prepare a TMP consistent with the City of Seattle’s Director’s Rule (SCDI Director’s Rule 05-2021 / SDOT Director’s Rule 01-2021). It would define the trip reduction goal and strategies. Seattle Municipal Code (SMC) *Chapter 23.52* outlines requirements for transportation concurrency and transportation impact mitigation. Developments with more than 30 dwelling units must contribute to achieving the single-occupancy vehicle (SOV) trips percentage targets shown on Map A for §23.52.004. The SOV goal for the Magnolia neighborhood is 38% by the year 2035. This means that 62% of the trips would need to use non-SOV modes of travel. For comparison, the SOV rate reflected by the standard ITE rates and equations used for this analysis ranges from 75% to 85%.² See **Appendix I** for potential strategies that could be included in the TMP.

Measure Proposed as Part of Project

Improve pedestrian facilities on Texas Way – For Alternative 1, Texas Way 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

² The baseline ITE vehicle trip generation rates and equations used for this analysis are based on surveys of sites in general suburban locations and do not reflect any transit use. They account for minimal walk, bike, and carpool use.

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.

Significant Unavoidable Adverse Impacts

The Fort Lawton Housing Redevelopment Updated Proposed Action (Alternative 1) may result in vehicular delay impacts to the following three unsignalized (all-way-stop-controlled) intersections that degrade operations to LOS F:

- W Emerson Place / Gilman Avenue W
- W Nickerson Street / 15th Avenue W Ramps
- W Emerson Street / W Nickerson Street (southbound yield to east-to-south right-turns)

Operations could be improved if signalized; however, there are physical constraints, closely-spaced-intersection considerations, and modal preferences (e.g., bicycle and pedestrian flows) for which SDOT may not support signalization and would prefer to tolerate the poor operations for vehicle traffic in favor of non-motorized modes. Therefore, the City may consider the vehicular delay impacts to these locations as significant adverse impacts. The recommended TMP measures to reduce vehicle trip generation may not fully mitigate these delay impacts. Therefore, the project could result in significant unavoidable adverse impacts at these locations during both the AM and PM peak hours.

3.11 Public Services

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 Alternative 1. 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 new buildings would be constructed in compliance with the 2021 Seattle Fire Code, which is comprised of the 2021 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 2021 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.
- Public service providers (SPD, SFD, and SPS) would continue to identify and plan for their future needs as part of their regular strategic planning, capital facilities planning, and budgeting process.

Other Possible Measures

- Van service could be provided as part of the project for senior/veteran supportive housing and possibly for the other affordable housing onsite to enhance access to services and employment opportunities.
- All of the schools that currently serve the Fort Lawton site are projected to have available capacity to serve additional students in the future. However, in the event that future enrollments potentially approach school capacities, SPS could take any or a combination of the following actions:
 - Providing transportation service to schools with capacity;
 - Adding or relocating portables;
 - Adding, relocating or removing programs;
 - Adjusting school boundaries; and/or
 - Adding to or renovating buildings.

Significant Unavoidable Adverse Impacts

Development of the Updated Proposed Action and associated increases in on-site population would result in an increase in demand for public services. However, increased demand is anticipated to be modest in nature and service providers would be anticipated

to have the capacity to serve the increases in demand. With the implementation of mitigation measures identified above, it is anticipated that significant unavoidable adverse public service-related impacts would not be expected.

3.12 Utilities

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 SEIS Alternatives. 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 and flow control, 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 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).

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse utility impacts are expected.

3.13 Housing and Socioeconomics

Mitigation Measures

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

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse housing or socioeconomic impacts are expected.

3.14 Environmental Justice

Mitigation Measures

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

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse environmental justice impacts are anticipated.

CHAPTER 2

INTRODUCTION AND DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

This chapter of the *Fort Lawton Army Reserve Center Redevelopment Update Draft Supplemental EIS* provides: 1) an overview of the 2018 Fort Lawton Army Reserve Center Redevelopment EIS; 2) an explanation of planning activities that occurred after the 2018 EIS for published, why a Supplemental EIS (SEIS) is being prepared, and what will occur after the SEIS process is completed; and, 3) a description of the City of Seattle updated proposal that is the basis of the Proposed Action analyzed in this Draft SEIS.

Key concepts related to this Draft SEIS are presented below in question-and-answer format. More detailed description of the Proposed Action follows these questions/answers. A detailed description of the affected environment, environmental impacts, mitigation measures and significant unavoidable adverse impacts is provided in **Chapter 3** of this Draft EIS.

2.1 Key Questions Regarding this Supplemental EIS

Q1. What were the Proposed Actions analyzed in the 2018 Fort Lawton Army Reserve Center Redevelopment EIS and in this SEIS?

- A. The City of Seattle Office of Housing (Office of Housing) identified the following Proposed Actions for the site that would be necessary to implement the objectives.
- City Council approval of a redevelopment plan;
 - City Council approval of a rezone of portions of the Fort Lawton site from SF 7200 to LR2 (M1) zoning classification;
 - Authorization to accept conveyance of the site from the Army and convey portions of the site for housing development, and execute easements;
 - Preliminary and final plat approvals;
 - Approval of funding for acquisition and development; and,
 - Land use, building, construction and other development permits and approvals.

The Proposed Actions for the site identified for this SEIS are similar to those identified in the 2018 EIS. However, because the rezone of a portion of the site from SF 7200 to LR2 (M1) has been implemented, this action is not a proposed action for this SEIS. The Proposed Actions identified in this Draft SEIS include:

- City Council approval of an updated redevelopment plan;
- City Council authorization of public property conveyances from the U.S. Army to the City of Seattle, including conveyance and/or ground lease agreements for parcels designated for housing development; and,

- City Council approval of the redevelopment plan.

Q2. What Alternatives were analyzed in the 2018 EIS?

A. For the 2018 EIS, the intent of the Fort Lawton Redevelopment was to “redevelop the approximately 34-acre former Fort Lawton US 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 2018 EIS also evaluated affordable housing development on the Talaris site in the Laurlehurst Neighborhood of Seattle as an example of development conditions and impacts associated with a different site in Seattle.

The alternatives analyzed in the 2018 EIS are as described below.

- **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 LR2 (M1) zoning. Public park uses would also be provided, including the creation of active and passive recreation areas, preservation of 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 with field lighting, 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 zoning.

Q3. What Elements of the Environment were analyzed in the 2018 EIS?

A. The 2018 Fort Lawton Army Reserve Center Redevelopment EIS contains detailed environmental analysis of the elements of the environment listed below – technical reports were prepared for several of these elements and were appended to the 2018 EIS.

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

Q4. What planning activities occurred after the 2018 EIS was issued?

A. After the 2018 EIS, the City proceeded with a resolution to the City Council in August of 2019. Once approved by City Council, the City submitted the redevelopment plan to HUD in August of 2019.

In 2022, the City hired a consultant to evaluate the infrastructure costs required for the 2019 plan. In 2023 it was decided to consider revising the plan to reflect an increased number of homes to further promote racial and economic equity and provide infrastructure efficiencies. In late 2023, the City requested an extension from HUD to revise the redevelopment plan. HUD granted the extension and this SEIS is evaluating the revision to the plan. In January 2025, approval of the redevelopment plan was granted by HUD.

Q5. What is a Supplemental EIS and why is it being prepared?

A. The Washington State Environmental Policy Act (SEPA) Rules (WAC 197-11-405(4)) indicate that a Supplemental EIS (SEIS) should be prepared to supplement a previously prepared SEPA EIS if:

- There are substantial changes to a proposal so that the proposal has the potential to have significant adverse environmental impacts; or,
- There is significant new information indicating or on, a proposal's probable significant adverse impact.

A public comment period is required for the Draft SEIS.

As indicated in response to Question 4 above, planning activities conducted subsequent to the 2018 EIS resulted in an update to the site plan that is the subject of this SEIS.

Q6. What will occur after this Draft Supplemental EIS is issued and what will the Final Supplemental EIS include?

A. A 30-day public comment period will follow issuance of this Draft SEIS; written comments can be submitted during this 30-day period (see the Fact Sheet of this Draft Supplemental EIS for more information). A public open house will be held during the 30-day comment period as well. Public and agency comments received on this Draft SEIS will be included in the Final SEIS. Responses to all applicable comments will be provided in the Final SEIS.

Q7. What will occur after the Final SEIS?

A. The Draft SEIS and Final SEIS will be used as tools by the City of Seattle (along with other considerations, analyses and public/agency input) to refine the Proposed Action.

The City of Seattle will continue to refine the Proposed Action, based on the results of the Draft SEIS, the Final SEIS, and additional information and input. Regulatory actions associated with the Proposed Action will be reviewed by the City of Seattle as required. Public hearings will be held during the decision-making process and there will be ongoing opportunities for public input.

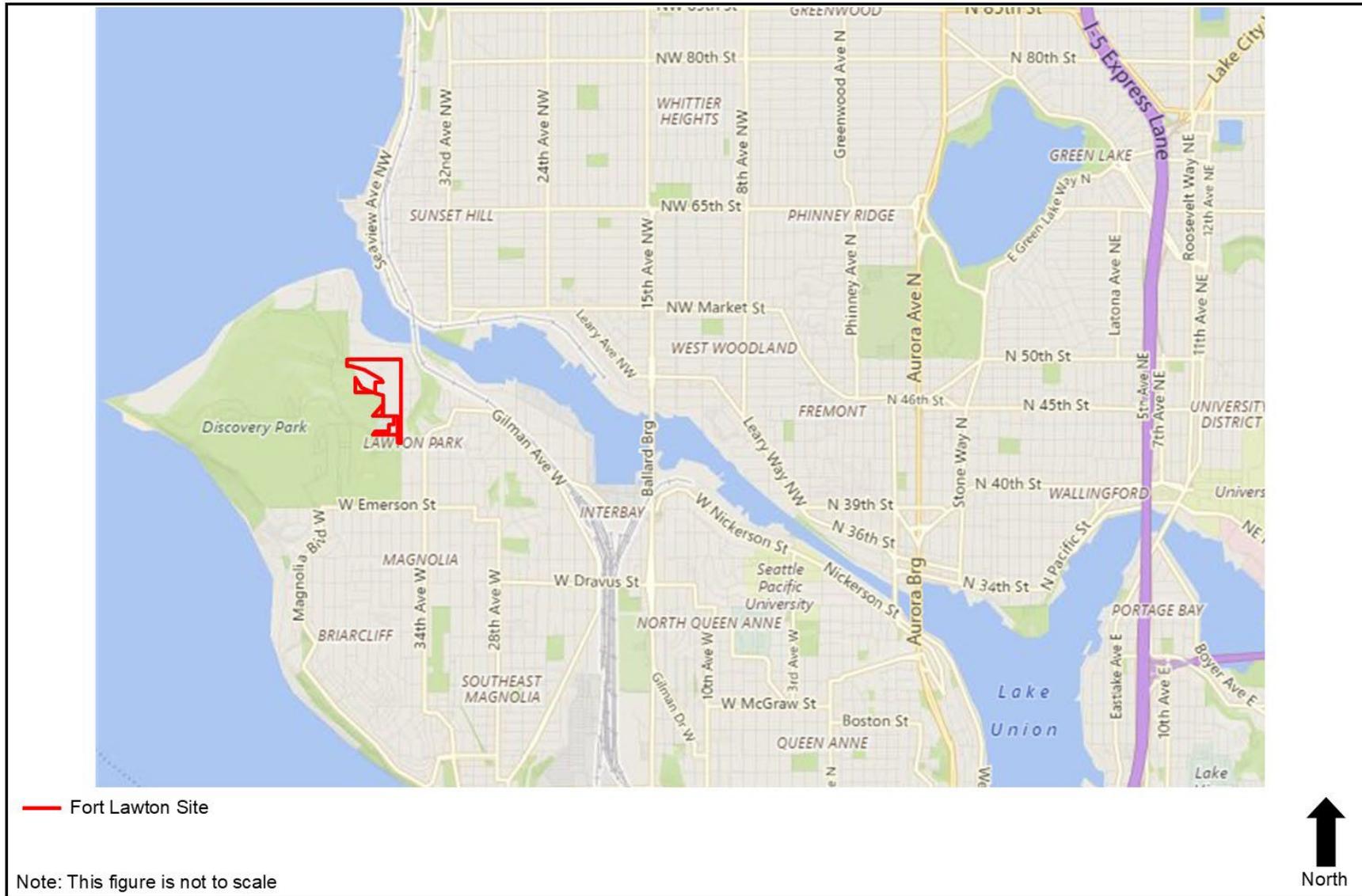
Sequent to the above actions, and approval by the US Army, permit applications for infrastructure improvements and construction projects within and adjacent to the site will be submitted to the City and other agencies over the buildout period. The City will determine whether the proposed permits have been adequately addressed in the SEPA SEIS. If so, further environmental analysis would not be required under SEPA and the City would make decisions on permits according to the appropriate process. For project actions that require other state and federal permits, the appropriate agencies would review the permit applications according to the applicable processes. These agencies would also determine if the SEIS adequately covered the impacts/mitigation related to the specific projects. When appropriate approvals have been obtained from the City and agencies, construction and redevelopment projects could be implemented on the site.

2.2 Introduction

The applicant, Seattle Office of Housing (Office of Housing), is proposing an update to the Fort Lawton Army Reserve Center Redevelopment Plan analyzed in the 2018 EIS. The Fort Lawton Army Reserve Center Update is proposed, among other things, to increase the number of affordable housing units on site consistent with existing zoning, and to increase the infrastructure cost efficiency compared to the alternatives analyzed in the 2018 EIS.

Accordingly, the Seattle Office of Housing is proposing redevelopment of the Fort Lawton Army Reserve Center site (site), including housing and park uses. The site is 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.

**Fort Lawton Army Reserve Center Redevelopment Update Project
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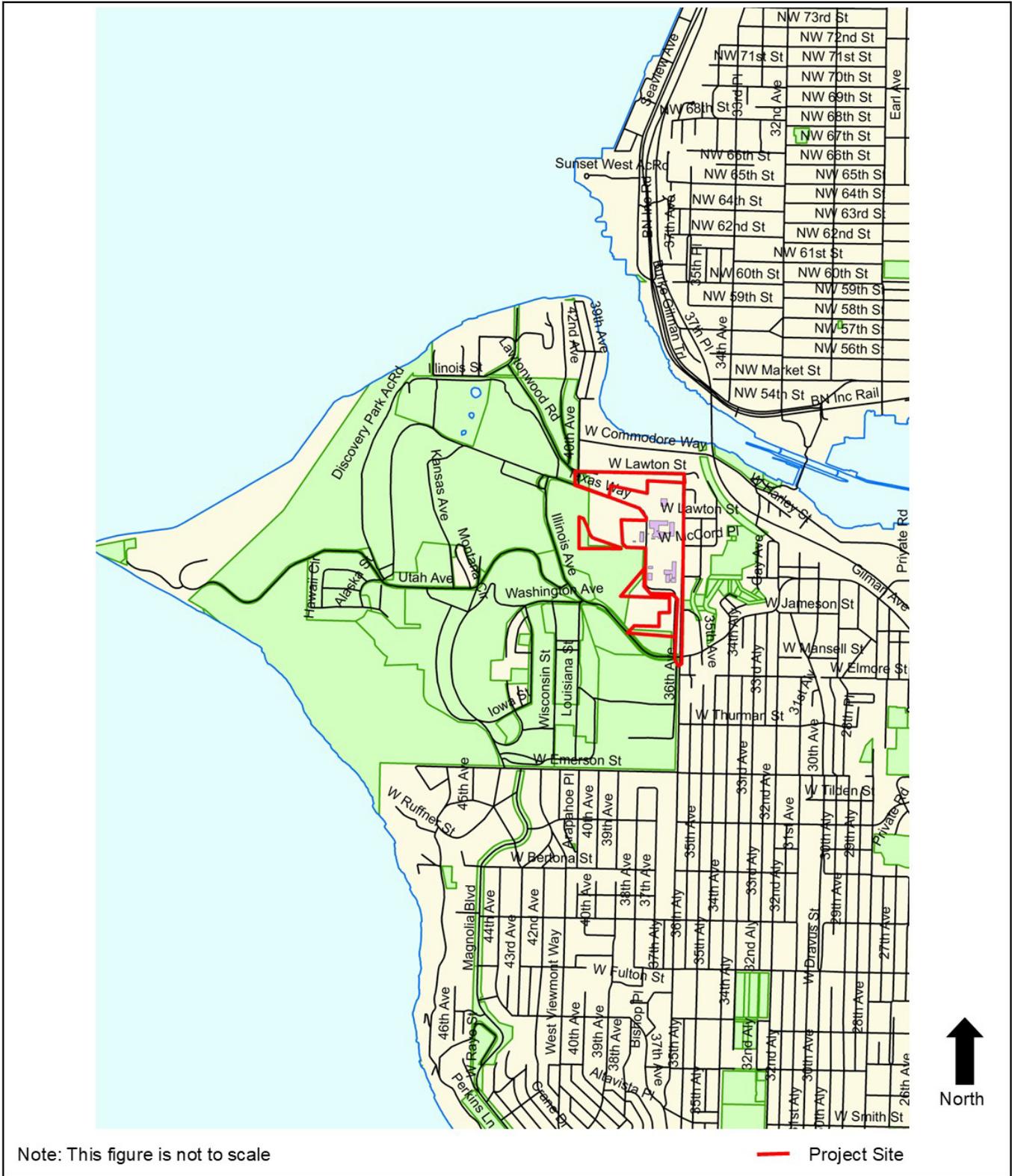


Source: SMR Architects, 2017.



Figure 2-1
Regional Map

**Fort Lawton Army Reserve Center Redevelopment Update Project
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Source: Seattle Office of Housing, 2017.



Figure 2-2
Fort Lawton Vicinity Map

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 2032. However, actual buildout could depend on specific economic and market conditions.

2.3 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. The below summarizes the key actions and processes associated with the Fort Lawton Army Reserve Center site in chronological order.

2006 - 2009

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 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.

2010 - 2012

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).

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

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).

2017 - 2019

Building on the past planning efforts, the City of Seattle formed a vision for the Fort Lawton Army Reserve Center that created an affordable, livable community for people with low incomes, and took advantage of the opportunity to increase recreational and open space. Specifically, the City envisioned up to 237 units 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 were also contemplated, including preservation of natural areas, and 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 led 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 included Catholic Housing Services of Western Washington and Habitat for Humanity Seattle-King County.

2018 SEPA EIS

The Seattle Office of Housing determined that the Fort Lawton Army Reserve Center Redevelopment project was likely to have a significant impact on the environment, and an EIS would be 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. During the 21-day EIS scoping period, two public scoping meetings (June 19 and June 21) were held to learn about the proposal and to provide input on the scope of the EIS.

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

The alternatives analyzed in the EIS included:

- **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.

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

- *Geology/Soils*
- *Air Quality*
- *Biological Resources*
- *Environmental Health*
- *Noise*
- *Recreation/Open Space*
- *Historic/Cultural Resources*
- *Transportation*
- *Public Services*
- *Utilities*

- *Land Use*
- *Aesthetics/Visual Resources*
- *Housing/Socioeconomics*
- *Environmental Justice*

The 2018 EIS also considered potential off-site locations for Alternatives 2 and 3. The Office of Housing determined that property located in the Laurelhurst neighborhood in northeast Seattle, the Talaris site, was a good candidate for an offsite location because it was recently put on the market (at that time), and was one of the few large, contiguous sites available in a residential area of Seattle that would meet the Office of Housing’s objectives. Potential redevelopment of the Talaris site was studied only as an example of a possible off-site alternative and was provided in order to conceptually analyze probable adverse impacts that would be expected with redevelopment at off-site locations in the city.

The Fort Lawton Army Reserve Center Redevelopment Project Draft EIS was published on December 14, 2017, with a public comment period ending on January 29, 2018. A public meeting on the Draft EIS was held on January 9, 2018.

Based on comments received on the Draft EIS, the Final EIS was prepared as the final step in the SEPA EIS process and was published on March 29, 2018.

2019 - Present

After the 2019 submission of the redevelopment plan to HUD and the U.S. Army the City worked with HUD on edits to the submission. In 2020, the process was delayed due to the COVID-19 pandemic. This delay lasted approximately two years. In 2022 the HUD regional office began to coordinate the effort and the City in the subsequent years did research on the infrastructure needs of the project to estimate cost. In January 2025, approval of the redevelopment plan was granted by HUD.

With the start of the process for this SEIS the City has also participated in over ten community meetings with Magnolia and Discovery Park community members. The City has also been closely coordinating with HUD and the U.S. Army on the timeline for the submission of the redevelopment plan and homeless housing application.

2.4 Environmental Review Process and Purpose

SEPA SEIS 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 SEIS). 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 Update 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 SEIS Scoping

The Office of Housing determined that the proposed update to the Fort Lawton Redevelopment project is likely to have a significant impact on the environment. Thus, an SEIS is required, per RCW 43.21C.030(2)(c).

On October 1, 2024, the City issued a Determination of Significance (DS) and Request for Comments on the Scope of the SEIS. The DS indicated that the 21-day EIS scoping period would end on October 23, 2024, 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 SEIS.

The SEIS Public Scoping meeting was held on October 10, 2024. During this meeting, the public was encouraged to provide both written comment as well as ask questions on the scope of the EIS. Approximately 65 people attended the 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 a continuous opportunity to provide written comment throughout the meeting.

During the EIS scoping comment period, approximately 20 comment letters/emails (comprising approximately 140 individual comments) were received during the 21-day public scoping period. All the comment letters/emails are available for review at the Office of Housing.

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

EIS Alternatives

The following two alternatives are analyzed in this SEIS:

- **Alternative 1 (Proposed Action)** – Mixed Income Affordable Housing and Public Park Uses.
- **Alternative 2** – No Action Alternative.

Elements of the Environment

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

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

Purpose of SEIS 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 the City of Seattle, other agencies and the public in the decision-making process for the Fort Lawton Project. An EIS does not recommend a course of action for or against.

The Washington State Environmental Policy Act (SEPA) Rules (WAC 197-11-405(4)) indicate that a Supplemental EIS (SEIS) should be prepared to supplement a previously prepared SEPA EIS if: there are substantial changes to a proposal so that the proposal has the potential to have significant adverse environmental impacts; or, there is significant new information indicating or on, a proposal's probable significant adverse impact.

This Draft SEIS for the Fort Lawton Update 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 Draft SEIS 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 Draft SEIS to provide another forum to gather comments on the Draft SEIS (see the **Fact Sheet** for the date, time and location of this meeting). Comments on the Draft SEIS can be submitted in writing any time during the public comment period or presented as testimony at the Draft SEIS public meeting.

Based on the comments received on the Draft SEIS, a Final SEIS will be prepared as the final step in the SEIS process. The Final SEIS will provide responses to comments received on the Draft SEIS from agencies, organizations and the public, and as necessary may contain clarifications on the alternatives and the analysis of environmental impacts. The Draft SEIS and Final SEIS 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 Update Project.

After the Final SEIS is issued, City staff will make recommendations to the decision-makers on the Fort Lawton Project. Additional opportunities for public input will occur during the application and permit review process.

This Draft SEIS has been prepared for the proposed Fort Lawton Update Project based on information that is currently available and that has been prepared specifically for this Draft SEIS. If substantial changes occur to the project following the issuance of the Final SEIS 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, the SEPA EIS process for housing and open space redevelopment of the site was initiated in 2017 and included publication of the *Fort Lawton Army Reserve Center Redevelopment Draft EIS* in December 2017 and the *Fort Lawton Army Reserve Center Redevelopment Final EIS* in March 2018 (collectively referred to as the 2018 EIS). This Draft SEIS supplements the 2018 EIS.

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.

2.5 Site Description and History

General Site Description

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**).

General Site History

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 SEIS, is currently vacant and leased by the City.

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

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 2-3**, 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**, 13.81 acres (approximately 40% of the site) are currently in built area/impervious surfaces and 20.17 acres (approximately 60% of the site) are in open space areas/pervious surfaces..

Fort Lawton Army Reserve Center Redevelopment Update Project
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Note: This figure is not to scale

— Project Site



North

Source: Google Earth, 2024.



Figure 2-3

Updated Existing Fort Lawton Site Conditions

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

Type of Surface	Existing Conditions (Ac.)
Built Area (Impervious Area)	
Buildings/Structure Footprints	2.25
Roadways/Sidewalks ¹	3.40
Surface Parking	<u>8.16</u>
Subtotal	13.81
Open Space Area (Pervious Area)	
Natural Wooded Area	2.92
Grass Area	6.06
Other Landscaping	<u>11.18</u>
Subtotal	20.17
TOTAL	33.98

Source: Seattle Office of Housing, 2024.

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

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

Existing Built Environment

The Fort Lawton site presently contains six buildings, roadways, parking areas and sidewalks (see **Figure 2-3**). The buildings include:

- Harvey Hall - Building 216
- Leisy Hall - Building 220
- Area Maintenance Support Activity (AMSA) Building 222
- Maintenance - Building 211
- Maintenance - Building 214
- Organized 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.

Existing Site Access and Circulation

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.

Existing Site Utilities

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.

Comprehensive Plan and Zoning Designations

The Fort Lawton site is designated as a Neighborhood Residential Area in the Draft One Seattle Plan.⁴ Neighborhood 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 Lowrise Multi-Family (LR2-M1) and Neighborhood Residential (NR2)⁵; see **Figure 2-4**.

The LR2 (M1) zone provides for: 1) a variety of multifamily housing types in existing multifamily neighborhoods and along arterials that have a mix of small-scale residential structures; and 2) accommodate redevelopment in areas within urban centers, urban villages, and station area overlay districts in order to establish multifamily neighborhoods of low scale and density. The NR2 zone provides for predominately detached single-family structures on lot sizes compatible with the existing pattern of development and the character of neighborhood residential area. While single-family residential uses are the primary uses allowed in the NR2 zone, other uses allowed outright by the Seattle Municipal Code include nursing homes and adult daycares (See Section 3.6, **Land Use**, for details).

⁴ City of Seattle, 2024

⁵ Note that for the 2018 Fort Lawton EIS the site was zoned Single-Family 7200 (SF 7200). Following issuance of the 2018 Fort Lawton EIS, a portion of the site was rezoned to LR2-M1 based on a rezone application (analyzed in the 2018 Fort Lawton EIS). Subsequent to the 2018 EIS the City of Seattle implemented a city-wide redesignation of single-family residential zones (including the SF 7200 zone) to the “Neighborhood Residential” and “Residential Small Lot” designations.

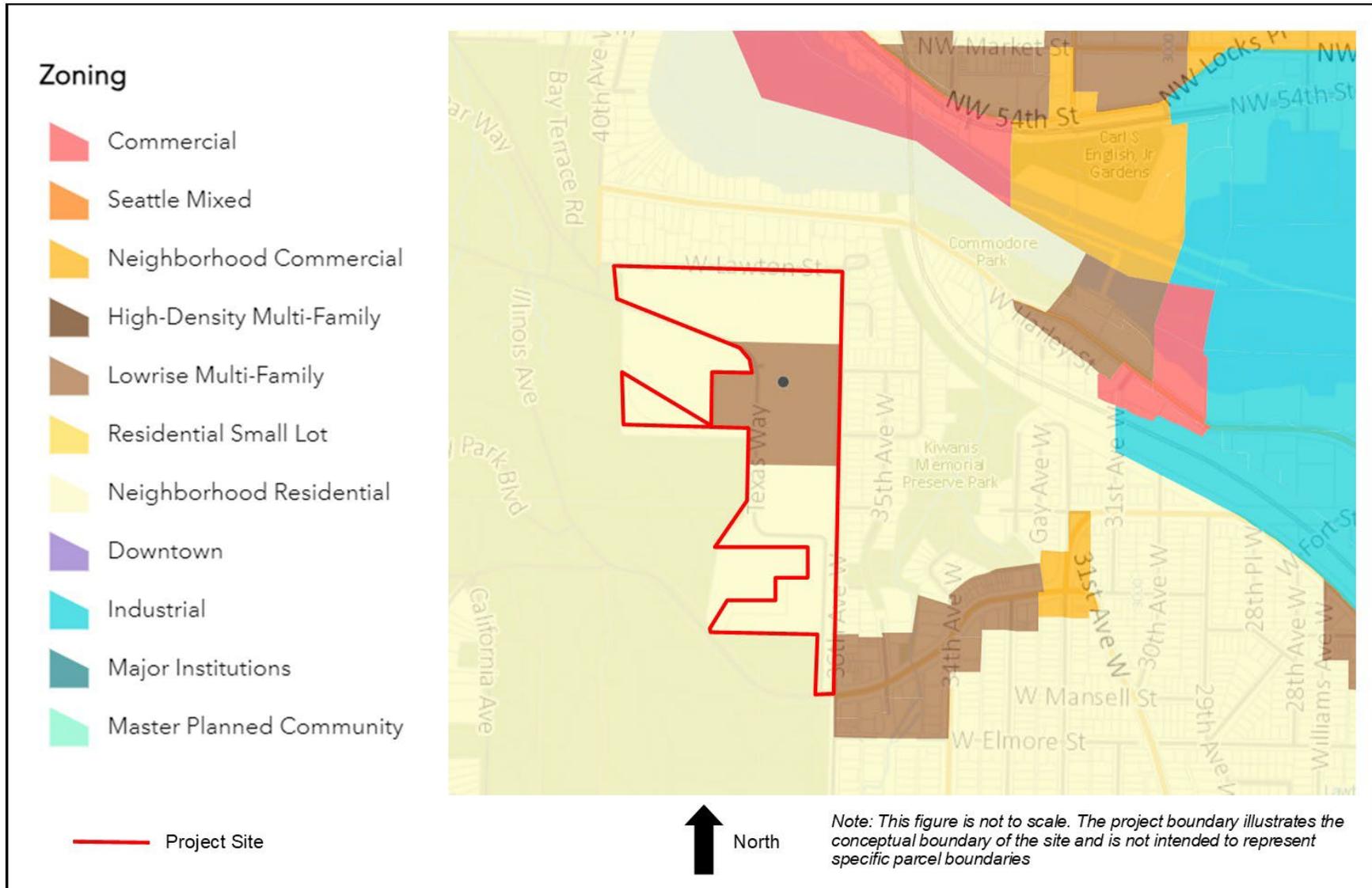
2.7 Description of the Proposal

Objectives of the Proposal

SEPA requires that an SEIS 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. The City of Seattle Office of Housing is planning for up to 500 housing units on the site reflecting a variety of housing types within the following ranges:
 - Up to 100 units of formerly homeless senior/veteran housing,
 - 150 to 200 units of affordable ownership housing for first time homeowners with 35 to 45 of these units being townhouse, and
 - 200 to 250 units of affordable rental units through partnerships with community organizations and public agencies to support low-income households to thrive.
- Mitigate displacement for low-income residents.
- Provide safe and stable housing to the most vulnerable populations in the city.
- Provide first time homebuyers an opportunity to purchase their first homes in Seattle.
- 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.
- Reduce existing public maintenance costs at Discovery Park.
- Work cooperatively with the Seattle Department of Construction and Inspections to adopt necessary land use approvals.
- 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.

**Fort Lawton Army Reserve Center Redevelopment Project
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Source: Seattle DCI, 2024



Figure 2-4

Fort Lawton Updated Existing Zoning Map

Purpose and Need for the Proposal

At this point, no federal actions or federal funding have been identified for the proposed Fort Lawton Update 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 includes 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, the 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 36,000/72% of low-income households (making less than \$77,000/80% AMI each year) 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.⁶ 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 the 2023-2024 school year, Seattle Public Schools served 1,635 homeless students, while the number of people living on the streets in King County rose 23% since 2022 to 16,385 (2024 Point-In-Time Count). In 2024, the point in time count identified 9,810 people living without shelter and another 6,575 people living in shelters or transitional housing in King County. Around 50% of the homeless population in Washington state are in Seattle/King County.

⁶ U.S. Census Bureau, "Gross Rent as a Percentage of Household Income in the Past 12 Months". 2022 5-year American Community Survey.

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 (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 have 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 \$850,272,⁷ an increase of 3.1% over the past year. Zillow predicts that home prices nationwide will rise 0.9% 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 is among the neighborhoods that utilized 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.

Between 2023 and 2024, Seattle's population increased by 18,500 individuals. Puget Sound Regional Council has projected that an additional 112,000 will move to Seattle by 2044, with most growth occurring in the city's urban centers and villages.

Proposed Actions and Redevelopment Concept

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

- City Council approval of an updated redevelopment plan;
- City Council authorization of public property conveyances from the U.S. Army to the City of Seattle, including conveyance and/or ground lease agreements for parcels designated for housing development;
- City Council approval of funding for acquisition and development.

⁷ Zillow Home Value Index (as of September 2024).

- Authorization to accept conveyance of the site from the Army and convey portions of the site for housing development, and execute easements;
- Preliminary and final plat approvals;
- Approval of funding for acquisition and development; and,
- Land use, building, construction and other development permits and approvals.

To implement the Proposed Actions, Seattle Office of Housing (Office of Housing), is proposing an update to the Fort Lawton Army Reserve Center Redevelopment Plan analyzed in the 2018 EIS. The Fort Lawton Army Reserve Center Update is proposed, among other things, to increase the number of affordable housing units on the site consistent with existing zoning, and to increase the infrastructure cost efficiency compared to the alternatives analyzed in the 2018 EIS.

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.

The Proposed Action differs from the Preferred Alternative analyzed in the 2018 Fort Lawton EIS (2018 – Alternative 1). **Table 2-2**, summarizes and compares the assumptions for the Proposed Action analyzed in this Draft SEIS with 2018 Fort Lawton Preferred Alternative.

Table 2-2 SUMMARY OF DEVELOPMENT COMPARISON

Development	2018 – Preferred Alt. (Alt. 1)	Update Proposed Action
Site Acreage	33.9	33.9
Total Housing Units	237	500
Building Heights	Up to three-stories	Up to four-stories
Turf/Lighted Sports Fields	2	0
Grass/Unlit Sports Fields	0	2
Open Space Acreage	22.49	22.49

Similar to 2018 Fort Lawton EIS Alternative 1, the *Fort Lawton Army Reserve Center Redevelopment Update* features a mix of affordable housing on the site, including affordable rental and ownership units, along with formerly homeless housing. As shown in **Tables 2-2**, up to 500 units would be developed on the site under the Proposed Action, compared to 237 units

under the 2018 Fort Lawton EIS Alternative 1. A total of approximately 1,600⁸ new residents would reside on the site under the Update compared to approximately 596 new residents under the 2018 EIS Alternative 1.

Proposed Development

Housing

The Proposed Action includes 500 housing units on the Fort Lawton site. A mix of affordable housing would be provided, including:

- **Senior/Veteran Supportive Housing** – Subsidized rental housing for formerly homeless individuals including senior citizens (55 years of age and older), veterans, who have income at or below 30% of the area median income (AMI);⁹
- **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.

Open Space

The total acreage of open space on the site under the Updated Proposed Action would be similar to that under 2018 Fort Lawton EIS Alternative 1, although the multi-purpose synthetic turf fields with lighting assumed under 2018 Fort Lawton EIS Alternative 1 would be replaced by a grass non-lighted multi-purpose field under the Updated Proposed Action. Approximately 60% of the Fort Lawton site would be in open space, including approximately 18.32 acres in passive open space and 4.17 acres in grass multi-purpose field.

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 throughout the site

⁸Population estimates for rent-restricted affordable housing are based on comparable projects and are calculated as follows:

- Senior Supportive housing – 100 residents (100 units x 1.0 resident per unit);
- Affordable rental – 563 residents (200 units x 2.5 residents per unit); and
- Affordable ownership - 875 residents (200 units x 5.0 residents per unit).

⁹https://www.seattle.gov/documents/Departments/Housing/PropertyManagers/IncomeRentLimits/2024/2024_RentIncomeLimits_5.28.24.pdf

as well. No direct sidewalk/trail connections are assumed to the residential neighborhood to the east.

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 the Updated Proposed Action similar to that under 2018 EIS 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.

Supportive Services, Facilities and Resident Associations

As under 2018 Fort Lawton EIS Alternative 1, supportive services would be provided under the Updated Proposed Action for formerly homeless residents, and community facilities would be provided for residents of the affordable rental and ownership housing on the Fort Lawton site as described below.

Senior Supportive Housing

As under 2018 Fort Lawton EIS Alternative 1, the supportive housing under the Updated Proposed Action would have a comprehensive package of services focused on residential stability. Chief Seattle Club has experience and a comprehensive approach on working with formerly homeless individuals. Services would include onsite case managers providing services such as crisis intervention, prevention, and a range of other services. Another 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 disabling conditions.

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.

Affordable Rental Housing

A versatile community space for tenants would be an integral part of the design of affordable rental housing, as tenant enrichment and empowerment are vital to the Office of Housing's vision for Fort Lawton. The community space would be 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 in partnership with United Indians of All Tribes 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 with 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. The partnership between Catholic Housing Services and United Indians of All Tribes is an integral part of the project and will likely have a seamless connection with the Daybreak Star Indian Cultural Center located in Discovery Park near the redevelopment site.

Affordable Ownership Housing

The affordable ownership housing would utilize a land trust model that involves a community association comprised of the Habitat for Humanity 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 for Humanity Homeowners. This would provide the support and guidance to the community members and ensure the Association is properly managed and property standards are maintained.

Sustainability

Under the Updated Proposed Action, sustainable design principles for the *Fort Lawton Redevelopment Update 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’s stormwater management system could include retention basins and rain gardens. The landscape design would include native drought resistant plants to reduce water usage.

Conveyance/Sale of Property

As under 2018 Fort Lawton EIS Alternative 1, development of the Fort Lawton site under the Updated Proposed Action 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.

Phasing Plan

The Updated Proposed Action would be approved and constructed over an estimated seven year period. Construction of the project would begin after property conveyance and other approvals, likely in 2025-2026. For analysis purposes in this EIS, buildout of the project is estimated to occur in 2032. Likewise, during future permitting, the number and mix of unit types and/or the specific type of park features could vary and could be approved so long as the environmental impacts are within the assumptions analyzed in this SEIS.

2.8 SEIS Alternatives

Alternative 1 – Updated Proposed Action

Because of the evolving nature of affordable housing needs and the potential for public funding which require flexibility to respond to these evolving factors, the exact mix of housing types and specific locations of buildings is not defined. Rather, a site plan reflecting reasonable worst-case assumptions is identified to represent implementation of the Updated Proposed Action and allow for comprehensive environmental review. The eventual finalized site plan would not exceed 500 housing units, with all buildings located within the housing area of the site (LR-2 zoned area) and consistent with the LR-2 zone height limit of 40-feet, as reflected in SEIS Alternative 1. See **Table 2-2** for a comparison of the assumptions for Updated Proposed Action (SEIS Alternative 1) analyzed in this Draft SEIS with 2018 Fort Lawton EIS Preferred Alternative 1. **Figure 2-5** and **Figure 2-6** presents the SEIS Alternative 1 site plan.

Housing

As indicated, the City of Seattle Office of Housing is planning for up to 500 housing units on the site consisting of up to 100 units of formerly homeless senior/veteran housing, 150 to 200 units of affordable ownership housing with 35 to 45 of these units being townhouse, and 200 to 250 units of affordable rental units. To provide a reasonable and conservative assumption for analysis in this SEIS, the number/types of housing analyzed under Alternative 1 is provided below.)

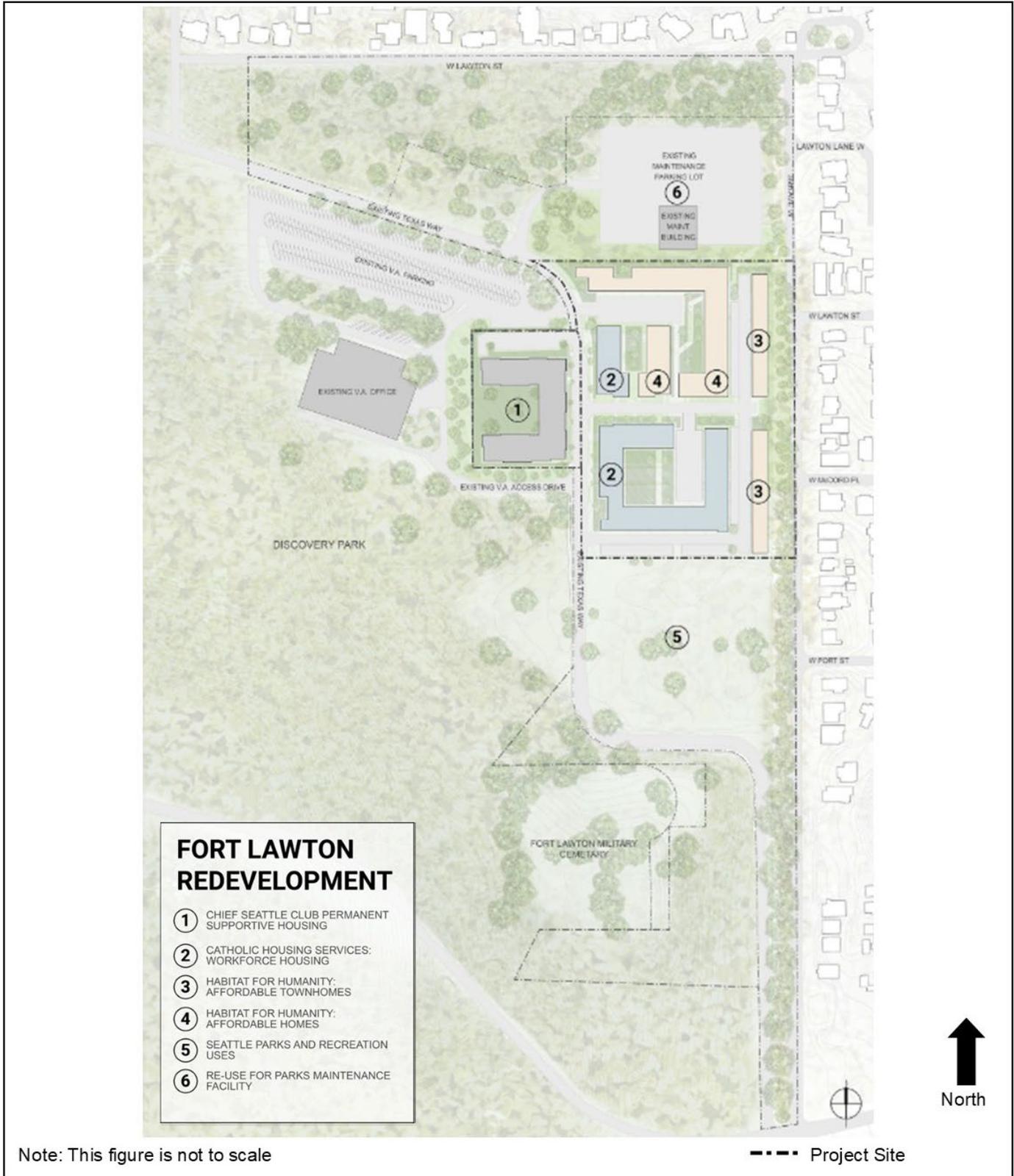
- Up to 100 units of permanent supportive multifamily housing for formerly homeless seniors and veterans;
- 200 units of affordable homeownership opportunities for families earning up to 80% of the area median income (including 45 townhouse units and 155 multifamily units); and,
- 200 units of affordable multifamily rental apartments for low-income households earning up to 60% of area median income, including families with children.

Table 2-3 summarizes the housing units assumed under SEIS Alternative 1 along with a comparison to the housing units under 2018 EIS Alternative 1.

Table 2-3 NUMBER/TYPE OF HOUSING UNITS COMPARISON

Type of Housing	2018 – Preferred Alt. (Alt. 1)	Update Proposed Action (SEIS Alternative 1)
Senior/Veteran Housing (at/below 30% AMI)	85	100
Affordable Ownership (at/below 80% AMI)	52	200
Affordable Rental (at/below 60% AMI)	100	200
Total	237	500

**Fort Lawton Army Reserve Center Redevelopment Update Project
Draft Supplemental Environmental Impact Statement**



Source: Seattle Office of Housing, 2025.

Figure 2-5
Overall Alternative 1 Site Plan



Fort Lawton Army Reserve Center Redevelopment Project Draft Environmental Impact Statement

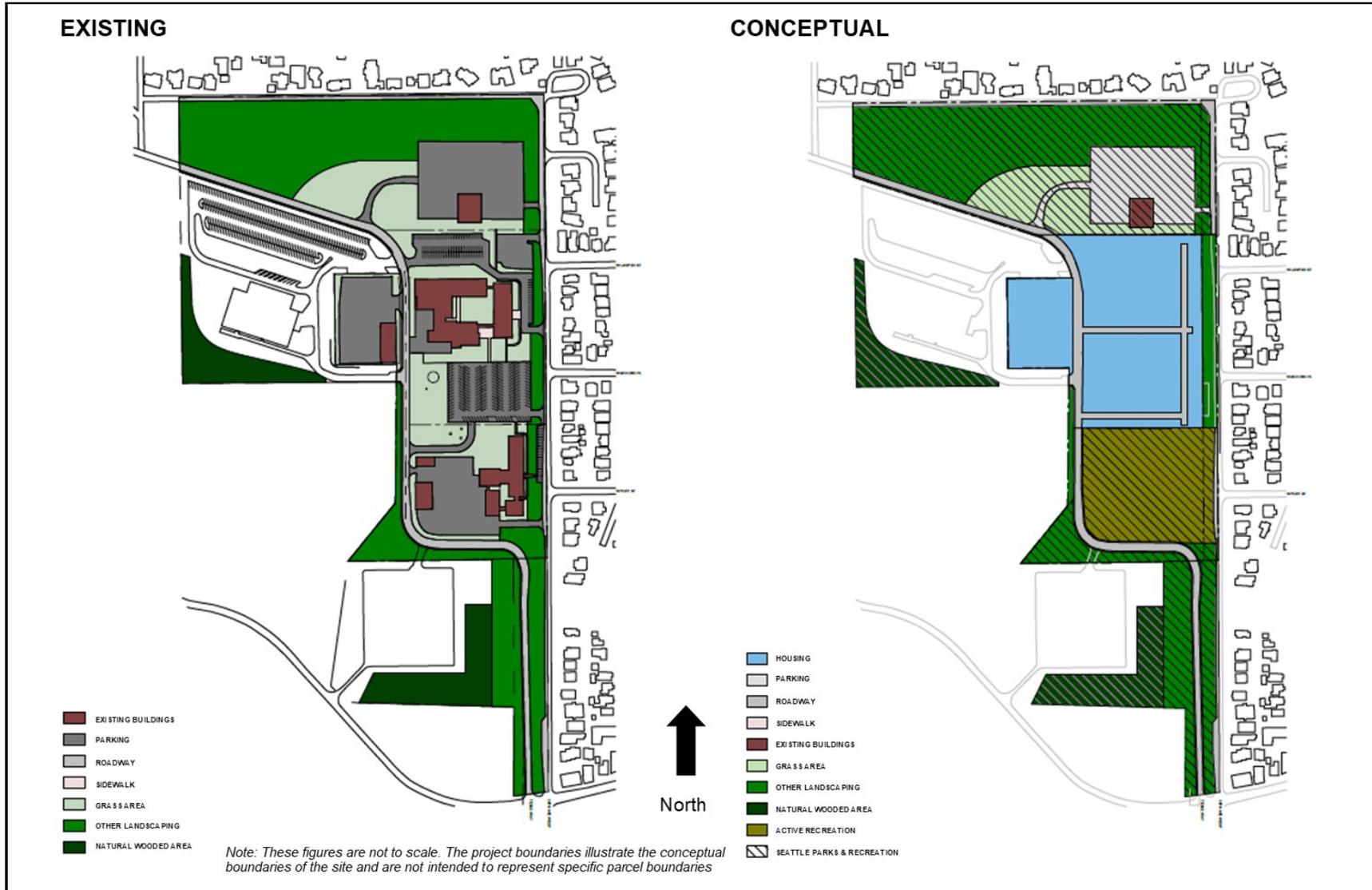


Source: Seattle Office of Housing, 2024



Figure 2-6
Alternative 1 Site Plan

**Fort Lawton Army Reserve Center Redevelopment Project
Draft Environmental Impact Statement**



Source: Seattle Office of Housing, 2025.



Figure 2-7
Site Area Identification Map

Open Space

The total acreage of open space on the site under the Updated Proposed Action (SEIS Alternative 1) would be similar to that under 2018 Fort Lawton EIS Alternative 1, although the synthetic turf multi-purpose field with lighting that was assumed under 2018 Fort Lawton EIS Alternative 1 would be replaced by a grass non-lighted multi-purpose field under the Updated Proposed Action. Approximately 60% of the Fort Lawton site would be open space, including approximately 18.32 acres in passive open space and 4.17 acres in grass multipurpose field. See **Table 2-4** for a breakdown of proposed site open space under Alternative 1 with a comparison to the 2018 EIS, and **Figure 2-7** for an illustration of site built and open space areas.

Table 2-4 OPEN SPACE COMPARISON

Type of Open Space	2018 – Preferred Alt. (Alt. 1) ¹	Update Proposed Action (SEIS Alternative 1)
	Open Space Area Acreage (Pervious Surface)	Open Space Area Acreage (Pervious Surface)
Natural Woodland Area	2.92	2.92
Grass Area	4.51	4.51
Other Landscaping	10.89	10.89
Active Recreation Area ²	4.17	4.17
Open Spate Total	22.49	22.49

Source: Seattle Office of Housing, 2025.

¹ The listed 2018 acreages vary somewhat from those presented in the 2018 EIS due to more detailed calculations prepared for this SEIS.

² The active open space under the 2018 EIS included turf fields with lights for nighttime use. The Updated Proposed Action includes grass fields with no lighting.

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

Multi-Purpose Playfield Open Space

A total of 4.17 acres of the site would be developed for active recreation activities under SEIS Alternative 1¹⁰. Two unlit grass multi-purpose fields would be located in the central portion of the site, to the south of the housing area. These fields could be configured in a variety of orientations for different uses, including structured and unstructured activities (structured activities include activities such as sports practices and games during daylight hours).

¹⁰ Note that active open space under the 2018 EIS included a turf field with lights for nighttime use. The Updated Proposed Action includes a grass field with no lighting

Passive Open Space

As under 2018 Fort Lawton EIS Alternative 1, a total of 18.32 acres of the site would be provided under SEIS Alternative 1 (Updated Proposed Action) for passive recreation activities such as picnicking and viewing (see **Table 2-4**). Existing wooded areas in the north and south parts of the site would be preserved in their natural condition. Passive parks would be located within the housing area in the central portion of the site, including a children's play area(s).. All park facilities would be designed and constructed to Seattle Parks and Recreation (SPR) standards, and would be owned and maintained by SPR. See **Table 2-4** for a breakdown of open space uses on the site under SEIS Alternative 1 (Updated Proposed Action) along with a comparison to open space conditions under 2018 Fort Lawton EIS Alternative 1. See **Table 2-5** for a breakdown of site area dedicated to Discovery Park, including passive open space.

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 throughout the site as well. No direct sidewalk/trail connections are assumed to the Magnolia neighborhood to the east or Discovery Park to the west.

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 the Updated Proposed action similar to that under 2018 EIS 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.

Site Area to be Dedicated to Seattle Parks and Recreation (Discovery Park)

Approximately 21.44 acres (approximately 63 percent of the site) would be dedicated to the City of Seattle Department of Parks and Recreation (SPR) for incorporation into Discovery Park. The approximately 21.44 acres to be dedicated to SPR is listed in **Table 2-5** and includes existing natural wooded area, grass area, other landscape area, the existing park maintenance building and storage/parking area, as well as the proposed grass multi-purpose fields.

Table 2-5 AREA DEDICATED TO DISCOVERY PARK

Area Type	Acres
Maintenance Building/Storage	2.47
Natural Wooded Area	2.92
Grass Area	<u>1.93</u>
Other Landscaping	9.94
Multi-Purpose Field	4.17
TOTAL	21.44

Source: Seattle Office of Housing, 2025.

Note: any calculation discrepancies due to rounding

Access/Parking/Transit

Overall, access/parking/transit improvements under the Updated Proposed Action would be similar to that assumed for 2018 Fort Lawton EIS Alternative 1. Differences between the Updated Proposed Action and the 2018 Fort Lawton EIS Alternative 1 primarily relate to improvements to Texas Way, including the designation for the portion of Texas Way W on the site as a “Park Boulevard” with associated improvement standards.

Access

Under Updated Proposed Action, 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 2-5**).

Texas Way W would be generally maintained in its current configuration and continue to serve as the main access route through the site. Texas Way through the site would be improved consistent with a “Park Boulevard” as defined by SMC 15.02.046 and would be similar to other roadways through Discovery Park. The Park Boulevard design is intended to provide flexibility for Texas Way to meet the mobility needs of existing and future public access, while maintaining an aesthetic character is respectful of park uses. This street would be improved to include:

- A right-of-way width of 42 feet compared to the existing 30-foot width;
- Add sidewalk to the east side of Texas Way from the north edge of the new housing area to Discovery Park Boulevard with connection to the existing sidewalk in 36th Avenue W; and,
- Add street trees to the east side of Texas Way.

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

Parking

Parking consistent with City of Seattle requirements (SMC 23.54.015) would be provided for the Updated Proposed Action. The majority of parking on the site would be located in paved surface parking lots, with parking for the townhomes located within the buildings

Transit

King County Metro transit bus stops would be provided at two locations along Texas Way W onsite: on either side of the roadway.

Utilities

Similar to 2018 Fort Lawton EIS Alternative 1, the Updated Proposed Action 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 the operation of the project, per City of Seattle standards (see Section 3.12, **Utilities**, for details).

Demolition and Grading

As under 2018 Fort Lawton EIS Alternative 1, all the buildings on the Fort Lawton site, except OMS - Building 245, would be demolished and removed under the Updated Proposed Action (SEIS Alternative 1). 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 is anticipated.

Development Summary

As indicated, Seattle Office of Housing (Office of Housing), is proposing an update to the Fort Lawton Army Reserve Center Redevelopment Plan analyzed in the 2018 EIS. The Fort Lawton Army Reserve Center Update is proposed, among other things, to increase the number of affordable housing units on the site consistent with existing zoning, and to increase the infrastructure cost efficiency compared to the alternatives analyzed in the 2018 EIS. A comparison of the development characteristics of 2018 Fort Lawton EIS Alternative 1 with the Updated Proposed Action (SEIS Alternative 1) is provided in the following **Table 2-6**.

Table 2-6 DEVELOPMENT COMPARISON SUMMARY

Type of Development	2018 – Preferred Alt. (Alt. 1)	Update Proposed Action (SEIS Alternative 1)
	Housing	Housing
Total Housing Units	237	500
Building Heights	Up to three stories	Up to four stories
	Built Area Acreage (Impervious Surface)*	Built Area Acreage (Impervious Surface)*
Retained Buildings Footprint	0.19	0.19
Housing Area	5.01	5.01
Roadways/Sidewalk	4.00	4.00
Surface Parking	2.28	2.28
Subtotal	11.49	11.49
	Open Space Area Acreage (Impervious Surface)*	Open Space Area Acreage (Impervious Surface)*
Natural Wooded Area	2.92	2.92
Grass Area	4.51	4.51
Other Landscaping	10.89	10.89
Lighted/Turf Active Open Fields	4.17	0
Grass/Unlit Multi-Purpose Fields	0	4.17
Subtotal	22.49	22.49
TOTAL	33.98	33.98

Source: Seattle Office of Housing, 2025.

Note: any calculation discrepancies due to rounding

Alternative 2 – No Action

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 by the U.S. Army to another entity in the future and could be developed in accordance with the uses allowed by the site’s 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 at a substantial cost discount;
- The opportunity to increase the quantity of affordable and formerly homeless housing, including for senior citizens and veterans in a portion of the City of Seattle with few affordable housing options;
- 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, 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 Army Reserve Center Update Project under the SEIS alternatives.

3.1 EARTH

This section of the Draft SEIS describes the earth-related conditions on and near the Fort Lawton site. Potential impacts from redevelopment are evaluated and mitigation measures identified. This section is based on the geotechnical report prepared by HWA | Geosciences, Inc. and Landau Associates in January 2025 (see **Appendix B**).

Key Findings

Geologic hazards are present at the Fort Lawton site, including steep slopes, erosion and seismic hazards. Construction and operation of the project under Alternative 1 on and near the geologic hazards could result in earth-related impacts. The impact of landslides is considered moderately high for the Updated Proposed Action because some of the proposed structures are located in or adjacent to landslide hazard areas; however, through proper site planning, such as the use of deep foundations, it would likely be possible to avoid this potential impact. 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 Alternative 1. 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, 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 site and for proposed development to disturb these areas and potentially cause earth-related impacts (see **Appendix B** for details on the geotechnical analysis methodology).

3.1.1 Affected Environment

This sub-section describes existing earth-related conditions on and near the 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.

Based on the City of Seattle GIS website, there are no areas of the Fort Lawton site that are identified as prone to liquefaction. However, the City has identified a liquefaction-prone area approximately 650 feet to the northeast of the site.

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.

3.1.2 Impacts of the Alternatives

An analysis of the potential adverse biological resource impacts of Alternative 1 (Updated Proposed Action) and Alternative 2 (No Action Alternative) is provided below.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses (Updated Proposed Action)

Construction

Development of Alternative 1 would include removing some of the existing pavement and most of the structures at the Fort Lawton site and preparing subgrade soil by grading, and placing and compacting structural fill. Construction of retaining walls and/or deep foundations may also be necessary to properly mitigate landslide hazards. 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.

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.

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 high for the Updated Proposed Action because some of the proposed structures are located in or adjacent to landslide hazard areas; however, through proper site planning, it would likely be possible to avoid this potential impact. Furthermore, site-specific analyses for future improvements in the vicinity of areas mapped as landslide hazard areas are needed prior to any construction to ensure compliance with City of Seattle requirements for setbacks and design. Landslide mitigation may include the construction of retaining walls and/or the use of deep foundations such as driven or drilled piles. Actual pile foundations would be determined as part of site-specific slope stability analysis for individual structures. Driven piles could result in increased levels of noise and vibration (see Section 3.4, Noise, for further details). While drilled piles do not produce substantial vibrations, the installation of temporary casing can produce ground vibrations and localized ground settlement.

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.

Liquefaction – Due to the glacially consolidated nature of onsite soils and the deep depth to groundwater, it is not anticipated that liquefaction would pose a major hazard to proposed development on the Fort Lawton site.

Seismically-Induced Landslides – While the surficial soils are not considered to be liquefiable, slope failures may occur seismic incidents near the proposed structures as the dynamic shear stresses produced by earthquake shaking increase the load along a potential failure plane. To address the potential impacts of such slope movement, mitigation measures would include site-specific slope stability analysis and design of any structures proposed near steep slope or landslide hazard areas.

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

The depth to groundwater at the Fort Lawton site is anticipated to be relatively deep; however, 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 buildout under Alternative 1, the Fort Lawton site would be covered in roadways, parking areas, structures, a vegetated sports field, landscaping and preserved natural open space. Approximately 11.49 acres of the site would be in impervious surfaces, compared to 13.8 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.

Alternative 2 – No Action Alternative

Under the No Action Alternative, the Fort Lawton site would not be redeveloped at this time and would remain in its existing condition. No earth-related impacts are anticipated with continuation of current conditions under Alternative 2.

It is possible that 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 zoning with the potential for some earth-related impacts.

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 Alternative 1 – Updated Proposed Action. 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 in the northern and western

portions of the site, development adjacent to or within landslide hazard areas, and to determine what structures could be influenced by excavation dewatering.

- As appropriate, deep foundations such as 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. Vibration monitoring would also be conducted with drilled piles.

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

With the implementation of mitigation measures identified above, no significant unavoidable adverse earth-related impacts are anticipated.

3.2 BIOLOGICAL RESOURCES

This section of the Draft SEIS describes the biological resources on and in the vicinity of Fort Lawton. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified. This section is based on the Biological Resources Report prepared by Facet in January 2025 which is included as **Appendix C** to this Draft SEIS.

Key Findings

Development of the under Alternative 1 (Updated Proposed Action) would occur only in areas of prior ecological disturbance and would not result in any additional loss of native habitats. In addition, there are no direct impacts to critical areas, native forests, or sensitive wildlife. Alternative 1 is anticipated to result in minor permanent and temporary impacts to wildlife including the displacement of any animals which occupy the site during construction, and indirect impacts associated with the proposed development such as increased human activity near wildlife and habitat, and increased predation from domestic pets (e.g., dogs and cats). Since the area of open space will increase after construction is complete, the total area of urban wildlife habitat is proposed to improve slightly, and no loss of native habitats would occur.

Methodology

Existing natural resource inventories and databases were reviewed for wetlands and streams, vegetation, and wildlife habitat that may be present on or near the study area. Online sources used for review of wetlands and streams include the following:

- USDA Natural Resource Conservation Service – Web Soil Survey application
- National Wetland Inventory (NWI) maps
- Washington Department of Natural Resources (WA DNR) – Forest Practices Application Mapping Tool
- BLM Land Status and Cadastral Survey Records
- WA DNR – Wetlands of High Conservation Value Map Viewer
- Google Earth aerial images
- King County’s GIS mapping website (iMap)
- City of Seattle’s GIS mapping website (SDCI GIS).
- Washington Department of Fish and Wildlife (WDFW) and Northwest Indian Fisheries Commission (NWIFC) Statewide Washington Integrated Fish Distribution (SWIFD)
- WDFW SalmonScape
- WDFW Priority Habitats and Species on the Web
- NatureServe’s LandScape Washington mapping application

In addition to the online resources listed above, reports on previous studies conducted at Fort Lawton were reviewed; applicable reports are cited in-text and **Appendix C**.

A site visit was conducted on June 28, 2017 to review site conditions, specifically to verify the previously reported lack of potential wetland and stream critical areas, assess existing vegetation, and note wildlife observations. The site was revisited on November 7, 2024, to document potential changes in site conditions.

The study areas for the assessments made in this section and **Appendix C** are limited to the project area boundaries on the Fort Lawton site (i.e., areas of potential direct impacts) as well as the areas immediately adjacent, or within approximately 300 feet of the respective project area boundaries. For the purpose of this analysis the “Fort Lawton Site” refers to the area of the proposed action and does not include other locations which were historically a part of Fort Lawton, such as what is now Discovery Park.

3.2.1 Affected Environment

This sub-section describes existing biological resources on the Fort Lawton site and site vicinity. The Fort Lawton site is located in the City of Seattle’s Magnolia neighborhood, adjacent to the eastern side of Discovery Park. Lands in the Fort Lawton site are characterized by a high cover of buildings, paved parking lots and associated infrastructure including paved driveways and roads. The site also includes open spaces and landscaping including mowed fields and patches of forest (see **Figure 3.2-1** for a map of the study area and biological resources).

The surrounding land use is predominantly residential to the east and north with open space and administrative facilities to the south and east, respectively. Also nearby, but not immediately adjacent, are Kiwanis Memorial Preserve Park, Kiwanis Ravine Overlook (east) and Commodore Park (northeast). Separated by the Ballard Locks, the marine and freshwater portions of Salmon Bay are located to the north and northeast, respectively. The study area and vicinity of can be generally described as *urban and mixed environs*, medium-density zone a land cover characterized as containing light industry and residential areas with the potential for isolated wetlands, streams, open spaces, and greenbelts to occur.

Wetlands and Streams

A review of online mapping resources does not indicate the presence of wetland or stream critical areas on or immediately adjacent to Fort Lawton. Wetlands, streams and associated riparian corridors mapped by the City of Seattle are located in the vicinity in both Discovery Park and Kiwanis Memorial Preserve Park. The reviewed topographic contour data of the north end of the property indicates the presence of concave landforms, which are geographic features in which wetlands and streams may be found.

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Draft Supplemental Environmental Impact Statement



LEGEND:

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



Note: This figure is not to scale

Source: Facet, 2025.
EA Engineering,
Science, and
Technology, Inc., PBC

Figure 3.2-1
Biological Resources Map

The *Fort Lawton Redevelopment Plan* prepared in 2008 by the City of Seattle Office of Housing reports that in 2006, a wetland was identified on the north slope of the property during a wildlife corridor study. During the June 2017 site visit, a wetland biologist from Facet identified skunk cabbage (*Lysichiton americanus*), an obligate¹ wetland plant, growing in a topographically low area south of W Lawton Street, generally consistent with the 2006 description of the wetland location. This potential wetland was not noted in the 2012 Corps Final Environmental Assessment cited previously. No other areas are suspected of containing wetlands or streams.

Vegetation

Consistent with reviewed reports of natural resources on the property, the remaining unmaintained natural vegetation present at Fort Lawton is concentrated in two areas located at the northern/northwestern and southern extent of the property (City of Seattle 2008; U.S. Army Corps of Engineers 2012). These patches are the only native-growth areas of the site which contain intact or partially intact functioning ecosystems. Fort Lawton also abuts forests located in Discovery Park on the west side of the property and includes a narrow strip of established trees on the east side of the property. Plant species on the Fort Lawton site were recorded in a 2004 Floristic Survey by the U.S. Army Reserve and are provided in Appendix C of the Final Environmental Assessment for BRAC 05 Recommendations for Closure, Disposal, and Reuse of Fort Lawton (U.S. Army Corps of Engineers 2012). Overall, plant species are typical of urban forests in the region. No sensitive or rare plants are known to occur in the project area or immediate vicinity.

North Forest

The north bluff of Fort Lawton is vegetated with primarily broadleaf deciduous forest. Red alder (*Alnus rubra*) and bigleaf maple (*Acer macrophyllum*) are most abundant, with minor constituents of western red cedar (*Thuja plicata*), sweet cherry (*Prunus avium*), bitter cherry (*Prunus emarginata*), black poplar (*Populus nigra*), black hawthorn (*Crataegus douglasii*), Pacific willow (*Salix lasiandra*), European mountain ash (*Sorbus aucuparia*), and Oregon ash (*Fraxinus latifolia*). Perimeter trees visible during the site visit generally consist of small, 10-14 inches diameter at breast height (DBH), and medium, 15-19 inches DBH, sized trees. The tree canopy is a single layer and is estimated as moderately closed (40-69%) overall.

The understory is vegetated with primarily shade tolerant non-native invasive plant species including English ivy (*Hedera helix*), hedge bindweed (*Calystegia sepium*), Himalayan blackberry (*Rubus armeniacus*), herb-Robert geranium (*Geranium robertianum*), Scotch broom (*Cytisus scoparius*), and knotweed (*Polygonum* sp.), consistent with previous reports by Seattle (2008)

¹Obligate wetland (OBL), almost always occurs in wetlands under natural conditions (estimated probability > 99%).

and U.S. Army Corps of Engineers (2012). Some native understory shrubs and groundcover plants are present, but suppressed by the prevalence of invasive species. Special habitat features present in the north forest include, but are not limited to, dead downed wood (trunks and branches), and leaf litter (City of Seattle 2008).

The north forest is also a designated biodiversity area and corridor and great blue heron breeding area by the WDFW PHS program.

South Forest

The south forest is located at the southern end of the project area, west of Texas Way and north of Discovery Park Boulevard. It connects and extends into forested areas of Discovery Park offsite to the west. The south forest consists of a mix of native broadleaf and conifer tree species including Douglas-fir (*Pseudotsuga menziesii*), bigleaf maple, red alder, Pacific madrone (*Arbutus menziesii*), and western red cedar. The canopy dominant trees are primarily 20-30 inch DBH Douglas-firs, with some individuals exceeding 30 inches DBH that extend above the general canopy layer. Other canopy trees are generally medium in size. The canopy is characterized as multi-story due to stratification of co-dominant and dominant canopy trees, and variation in age class. The forest has a closed canopy, with cover estimated between 70-100%.

Shade-tolerant invasive non-native plants are also present in this forested patch, though there is a higher proportion of native species than the north forest. Common invasive species include English ivy, English holly (*Ilex aquifolium*), cherry laurel (*Prunus laurocerasus*), and Himalayan blackberry. Observed native understory plants include osoberry (*Oemelaria cerasiformis*), red elderberry (*Sambucus racemosa*), beaked hazelnut (*Corylus cornuta*), native woodland roses (*Rosa* sp.), trailing blackberry (*Rubus ursinus*), and sword fern (*Polystichum munitum*), consistent with previous reports by Seattle (2008) and U.S. Army Corps of Engineers (2012).

The south forest is also part of a designated biodiversity area and corridor by the WDFW PHS program.

Other Vegetated Areas

Other vegetated areas in Fort Lawton are maintained or managed landscapes that are generally vegetated by non-native species. These patches included mowed fields, landscaping beds, strips of trees, and other types of landscaped vegetation. These areas offer relatively little habitat value when compared to the forested patches in the project area and vicinity. Two narrow strips of native conifer trees are present on the eastern perimeter of the project area, west of 36th Ave W, and between Texas Way and the Veterans Administration building parking lot. These areas are composed of primarily native trees, some snags and logs, and a managed

understory. Although some habitat value is provided, this is limited by the small area, linearity, frequent disturbance, and edge effects.

Offsite

Vegetation and habitat within approximately 300 feet of the project area was also evaluated to review habitat connectivity and the offsite effects of potential project impacts. Two notable areas were identified, Discovery Park and Kiwanis Ravine Overlook / Kiwanis Memorial Park, (hereafter collectively referred to as “Kiwanis Park”).

In general, these city-owned parks are relatively contiguous forested areas, except as divided and fragmented by roads and trails. Both Kiwanis Park and Discovery Park are characterized as mixed broadleaf-coniferous forests, although the composition differs between the sites. Kiwanis Park is nearly entirely broadleaf deciduous, with some conifers mixed in. Although Discovery Park is also primarily broadleaf dominant, it is a larger forest with more heterogeneity. There are also stands dominated by conifers, and varying levels of mixture.

Both parks are subject to common urban forest health issues, such as the presence of invasive species, pedestrian/passive use and shifts in composition and structure departing from the historic range of variability. Both parks contain relatively mature second growth forest, and contain trees of variable age classification, size, and structure. These forests provide habitats that may be used by a wide variety of native wildlife species, and include special habitat features such as standing and down dead wood, and tree cavities.

Discovery Park and Kiwanis Park are both designated as biodiversity areas and corridors by the WDFW PHS program. Kiwanis Park is also mapped as a great blue heron breeding area by WDFW and the City of Seattle. According to Seattle’s SDCI database, both Discovery and Kiwanis Parks also contain streams with associated riparian corridors and wetland environmentally critical areas.

Fish and Wildlife

The remaining forested habitat patches in the Fort Lawton site serve as valuable wildlife refuges in an otherwise urban landscape. The proximity and connectivity to nearby forested city parks are also likely allow for increased diversity of occupying wildlife, compared to otherwise isolated patches. However, when viewed at a larger scale, these forested areas are highly fragmented and isolated, lacking habitat connectivity to other local or regional terrestrial habitat areas.

Habitat patches on the Fort Lawton site are expected to be used by a variety of wildlife species. Wildlife use of the Fort Lawton project area and vicinity is well documented in prior surveys. A total of 43 bird species were observed during the winter of 2004, and breeding point count

surveys on the Fort Lawton site recorded by the U.S. Army Reserve are provided in Appendix C of the *Final Environmental Assessment for BRAC 05 Recommendations for Closure, Disposal, and Reuse of Fort Lawton* (U.S. Army Corps of Engineers 2012). These species consist of a mix of common urban-adapted bird species (e.g., American crows, European starlings, house sparrows) as well as species less tolerant to urbanization. Note that, while great blue herons and bald eagles were observed in flight during these surveys, no breeding areas or nests are known to be present currently. The preservation of connected habitat areas in Discovery Park likely contribute to the observed biodiversity at Fort Lawton.

As stated previously, the north forest patch and Kiwanis Park are mapped as great blue heron breeding areas by WDFW. They are also mapped as heron management areas and wildlife environmentally critical areas (ECAs) by the City of Seattle. In addition, bald eagle breeding areas are identified in Discovery Park, outside the study area by Seattle SDCI.

Fish are not present on the Fort Lawton site or immediate vicinity due to a total lack of surface waterbodies that could contain fish habitat. Amphibians and reptiles are expected to be uncommon due to the surrounding roads and residences which disconnect onsite habitat from nearby vegetated areas and generally create movement barriers for these types of wildlife species. Terrestrial mammals that are expected to commonly use habitat in the Fort Lawton study area include, but are not limited to mice, moles, voles, rats, squirrels, chipmunks, rabbits, raccoons, opossums, coyotes, deer, and bats. On occasion, more cryptic mammals have been documented in nearby Discovery Park, including a cougar in 2009 that was subsequently relocated (Clarridge & Turnbull 2009).

Great blue herons are the only species of local importance which have been documented in the vicinity of the site, Great blue herons are regulated by the City of Seattle as a species of local importance and by WDFW as a priority species. A nearby great blue heron rookery was documented in Kiwanis Memorial Reserve Park in the past (U.S. Army Corps of Engineers 2012). Forests in Kiwanis Memorial Reserve Park and the north forest onsite are mapped as breeding areas by WDFW and SDCI-GIS. According to WDFW's website (WDFW n.d.), as of April 2014, the Kiwanis heron colony abandoned the Kiwanis site due to repeated bald eagle attacks and is not expected to return. This is consistent with June 2017 and November 2024 site visit observations, as no heron activity, colonies or nests were identified during field investigation. Currently, the nearest known heron rookery is in Commodore Park, approximately 1,000 feet from the Fort Lawton site.

Great blue herons typically nest in the tops of trees near foraging habitat such as streams, lakes, ponds, wetlands, saltwater shorelines, and upland fields. Since the Fort Lawton site contains forests, it may provide potential nesting habitat to great blue herons, although no nests have been documented on-site presently or historically.

There are only two priority species expected to occupy the site, including Columbia black-tailed deer and western bumblebee. Columbia black-tailed deer are designated for recreational, commercial, and/or tribal importance rather than conservation and the project would have no effect on populations. Western bumblebee was once common to the region and has declining populations due to a variety of anthropogenic impacts. Western bumblebees are habitat generalists and can live in most ecosystem types that provide adequate floral nectar. Fort Lawton is regularly mowed and does not provide abundant nectar opportunities, although some level of bumblebee presence cannot be ruled out. There are several other uncommon species which occupy forest ecosystems and have a potential presence in the vicinity. These include American goshawk, Vaux's swift, western toad, roosting concentrations of bats, and Townsends big-eared bat. Due to proximity, the site may also be used by shorebirds, although these are not considered because onsite habitats are not a primary association. No designated state or federally listed species are known to occur on or immediately adjacent to the Fort Lawton site, although certain aforementioned priority species are also state candidate species.

3.2.2 Impacts of the Alternatives

An analysis of the potential adverse biological resource impacts of Alternative 1 (Updated Proposed Action) and Alternative 2 (No Action Alternative) is provided below.

Alternative 1 - Mixed Income Affordable Housing and Public Park Uses (Updated Proposed Action)

Under Alternative 1, the City of Seattle Office of Housing is planning to develop up to 500 housing units on the Fort Lawton site, as well as passive recreation areas, roadways, driveways, sidewalks, parking, landscaping, and other associated infrastructure and utilities. Approximately 66% of the Fort Lawton site would be in open space including undisturbed forests, passive open space, and landscaped areas; the remaining 34% would be structures and impervious areas; all of the northern and southern forest areas are also proposed to be retained. By comparison, Fort Lawton currently has 60% pervious open space and 40% is structures and impervious surfaces. Therefore, Alternative 1 would result in a net reduction of impervious surface area, and increase in open space.

Effects on Biological Resources

Construction

Proposed development under Alternative 1 would only occur in areas of prior ecological disturbance and will not result in any additional loss of native habitats. Similarly, there are no direct impacts to critical areas (i.e., the potential wetland in the north forest area), native forests, or sensitive wildlife. Open space at the site, including passive open space areas and

grassy multi-purpose spaces will increase in area by approximately 2.32 acres. Although such managed landscapes and open spaces are of relatively low ecological value, the vegetated area provides green infrastructure benefits. No development is proposed which would compromise the movement of wildlife to and from the property; the project will not result in reduced connectivity or worsen fragmentation. Up to 4.7 acres of forest land owned by the U.S. Army in the west portion of the site would be dedicated to Discovery Park and would also be preserved as natural area.

In addition, development of the site under Alternative 1 would result in temporary construction activities that could impact wildlife within the immediate site area. The primary drivers of construction impacts to wildlife include the removal of trees and other landscaped area, and indirect impacts of construction equipment such as noise, dust, and visual disturbance. Although the construction site is not thought to contain quality native habitat, the site is used by urban adapted and synanthropic species. The construction project is expected to cause displacement to any wildlife using the site, and have the potential for incidental mortality. Species occupying the site are not known to be of conservation concern, and the scale of the action is not believed to have any effect on species conservation at the population or species levels. However, all wildlife impacts do warrant consideration. The proposed built and landscaped environment will eventually provide equal or greater urban habitat opportunities than the existing site, considering the greater amounts of open space. However, as noted previously, neither the current nor proposed site development area contain native habitats and neither are considered well suited for habitat conservation.

Operation

Biological resources can also be affected indirectly by operational impacts from developments even when habitat loss does not occur. For instance, an increase in human activity from residents and their vehicles could affect patterns of wildlife use in nearby habitats. Wildlife species vary in sensitivity to human disturbance, and many avoid areas where human activities are present. The addition of 500 new residences on a primarily abandoned site is expected to increase human activity, which could affect surrounding habitats within an audible and visible range of the site. Alternative 1 also proposes an increase in building height, but a reduction in impervious land area, counteracting negative and positive factors of visual disturbance. Considering the location of the project in a highly urbanized environment, the presence of existing development, and lack of documented sensitive wildlife species, the potential effects of Alternative 1 are anticipated to be relatively minor. This is because the proposed development is comparable in development intensity and sensitive wildlife species, such as urban avoiders, are unlikely to be present. The wildlife species that do use the site are habituated to the urban environment of a major city.

Other indirect effects of the project include the effects of bird collisions from windows and domestic pets such as cats and dogs which predate on wildlife, particularly birds and small mammals. Depending on how the new development is maintained, the use of pesticides and fertilizers could also indirectly affect wildlife, including insects. Artificial light is also considered an impact to wildlife, although the site is currently well lit and is not expected to significantly intensify as a result of the project.

With implementation of the proposed temporary and permanent stormwater control systems on the Fort Lawton site, and a net reduction in impervious surface, it is anticipated that Alternative 1 would not result in net stormwater impacts to downstream biological resources; therefore, no indirect impacts to these resources are expected from operation of the proposed development under Alternative 1.

Alternative 2 – No Action Alternative

Under Alternative 2, the Fort Lawton site would not be redeveloped at this time. The existing buildings would remain in their current, vacant condition. The City of Seattle would terminate its lease of the property and the Army would resume maintenance of the site and facilities. The use of the park maintenance facility would continue at the discretion of the operators and owners. The property would continue in its current state and the baseline environmental character would be maintained. This includes the continuation of existing environmental impacts such as lights, noise, and traffic. No new biological resource impacts would be anticipated under continuation of current conditions under Alternative 2.

It is also possible that 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 zoning.

3.2.3 Mitigation Measures

The following measures have been identified to address the potential biological resource impacts from construction and operation of the Fort Lawton Project under Alternative 1. 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.

Mitigation measures discussed in this section are driven by local, state, and federal regulations (as applicable) and best management practices. For example, the City of Seattle requires certain mitigation measures when working near environmentally critical areas, including wetlands and

Fish and Wildlife Habitat Conservation Areas (FWHCAs), as well as significant trees in order to avoid adverse impacts to these biological resources. These City requirements are discussed in further detail in **Appendix C**.

Legally-Required Measures

- Delineate, survey, and rate wetlands to determine required buffers per SMC 25.09.160, and ensure compliance with applicable regulations.
- If required by the City of Seattle, develop a great blue heron management plan for Fort Lawton site per DPD Directors Rule 5-2007 and 13-2018, including: that any clearing, grading or outside construction would be done outside of the nesting season.
- Identify Tier 1-4 trees in the development areas of the sites per SMC Chapter 25.11 and implement tree protection and replacement measures, as applicable.
- Install temporary and permanent stormwater control systems to limit water quality impacts on downstream resources.
- Install temporary fencing at any tree retention areas, ECA buffers, or habitat preservation areas to limit disturbance.
- Comply with any Migratory Bird Treaty Act requirements, and/or avoid or limit vegetation removal and construction activities during the breeding season.
- Coordinate with WDFW when working near nesting habitat associated with known great blue heron breeding areas, as applicable.

Measures Proposed as Part of Project

- Permanent fencing will be constructed at the edge of potential wetland buffer and at edges of habitat areas to discourage intrusions by people and pets.
- Direct lighting away from natural areas, use downcast lighting, and limit or exclude night lighting, where feasible.
- Maintain and monitor mitigation sites and retained/installed trees, as applicable.
- Limit use of fertilizers, pesticides and herbicides in developed areas.

Other Possible Measures

- Consider integrating wildlife habitat features in the project design including but not limited to bird boxes, bat boxes, bird-safe window designs, raptor nest platforms, utilizing native plant species in open space and landscaping design, and leaving open spaces unmoved where feasible, etc.
- Consider installation of interpretive signs or distribution of information on biological resources for public education.

3.2.4 Significant Unavoidable Adverse Impacts

Development of the Updated Proposed Action under Alternative 1 is anticipated to result in minor permanent and temporary impacts to wildlife including the displacement of any animals which occupy the site during construction, and indirect impacts associated with the proposed development. Since the area of open space will increase after construction is complete, the total area of urban wildlife habitat is proposed to improve slightly, and no loss of native habitats will occur. Both Alternative 1 and the No Action Alternative would result in indirect impacts to wildlife due to the proposed use or perpetuation of the current site use. No significant unavoidable adverse biological resources impacts are anticipated under either alternative.

3.3 AIR QUALITY/GREENHOUSE GAS EMISSIONS

This section of the Draft SEIS describes air quality and greenhouse gas (GHG) conditions on and near the Fort Lawton site. Potential impacts from redevelopment of the SEIS Alternatives are evaluated and mitigation measures identified. This section is based on the Air Quality report prepared by Landau Associates in January 2025 (see **Appendix D**).

Key Findings

Near the Fort Lawton site, the largest existing contributor to criteria air pollutants is on-road vehicular traffic. The site is 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 (Updated Proposed Action), 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, Alternative 1 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 1 is projected to have annual average GHG emissions of 5,693 MTTCO₂ per year.

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.

The King County SEPA GHG Emissions Worksheet (2019) was used to evaluate existing and future buildout GHG emissions. Four types of life-cycle emissions were estimated using the SEPA GHG Calculation Tool: stationary combustion equipment, energy, transportation and pavement.

(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 site.

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 (NO_x) and sulfur oxides (SO_x) are emitted by mobile sources and fuel-burning stationary sources. NO_x and SO_x pollution from tailpipe emissions form regional haze and acid deposition in the Olympic and Cascade Mountains surrounding Seattle, and NO_x 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}. King County is also in attainment for CO although maintenance strategies are in effect (see **Appendix D** for detail).

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 site is 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.

Washington State's Climate Commitment Act (CCA) was signed into law in 2021, and went into effect on January 1, 2023. The CCA caps and reduces GHG emissions from Washington's largest emitting sources and industries, to help Washington achieve a goal to reduce GHG emissions by 95 percent of 1995 emissions by 2050. Washington businesses and operations that emit more than 25,000 annual metric tons of CO₂e are required to comply with the cap-and-invest program established by the CCA, which sets an annual cap on GHG emissions and auctions a controlled number of allowances; entities with emissions less than 25,000 annual metric tons of CO₂e may opt in to the program.

The Clean Fuel Standard, passed by the Washington Legislature in 2021 and in effect as of January 1, 2023, created rules for the Clean Fuels Program to meet the goals of the standard. Under the program, a market approach is intended to incentivize fuel producers to reduce the GHG impact of their products by 20 percent by 2034 (Ecology 2022). For the Greenhouse Gas Assessment for Projects, a new rule directed by Governor Jay Inslee in December 2021, also known as the GAP rule, rulemaking is currently paused while public comments for the CCA and Clean Fuel Standard are being considered, along with any potential intersections with the new rules (Ecology; accessed September 20, 2024)

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.

¹ Puget Sound Clean Air Agency, 2004.

Currently, the PSCAA is leading the EPA's Climate Pollution Reduction Grant program for the Puget Sound region (PSCAA; accessed January 2, 2024), a component of the federal Inflation Reduction Act along with the Washington State Department of Commerce. Priority climate action plans and implementation proposals covering all source categories including transportation, the built environment, and more, were due to the EPA in spring 2024.

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 One Seattle *Plan* outlines the City's goal of reducing GHG emissions by 58% from 2008 levels by 2030 and becoming carbon-neutral by 2050. The 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.)

3.3.2 Impacts of the Alternatives

An analysis of the potential adverse air quality and GHG impacts of Alternative 1 (Updated Proposed Action) is provided below.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Updated Proposed Action)

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, the amount of vegetated area on the site would not be reduced.

Operation

Air quality impacts that could result from residential development under Alternative 1 would include heating 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.

Alternative 1 would also increase local vehicle miles traveled (VMT), which would contribute to tailpipe emissions in the immediate site vicinity; however, the Alternative 1 is not intended to increase the forecast population and economic growth throughout the Puget Sound region. Providing housing for Puget Sound residents closer to needed services is expected to decrease total VMT in the region; therefore, the increased emissions caused by proposed development at the site are not expected to contribute to future worsening of regional air quality. Any change in tailpipe emissions would be very small relative to the overall regional tailpipe emissions in the Puget Sound air basin.

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 site are not expected to cause significant air quality impacts in the Puget Sound region.

Greenhouse Gas Emissions

Projected buildout (2032) GHG emissions for Alternative 1 is presented in **Table 3.3-1**. The annual GHG emissions for Alternative 1 are calculated based on the future land use listed in Table 1 of **Appendix D**. **Table 3.3-1** lists the life cycle GHG emission increases caused by combined future development at the Fort Lawton site under Alternative 1 (Updated Proposed Action).

**Table 3.3-1
COMPARISON OF ANNUAL GHG EMISSIONS (Per 1,000 sq.ft.)**

GHG Emission Estimates	Multi-Family Units, Large Building	Multi-Family Units Small Building	Medical Outpatient	Projected Average Annual GHG Emissions (metric tons CO ₂ e per year) ^a	
				Alternative 1	No Action
Forecast Emissions					
Emissions (Stationary Combustion) ^b	33	54	39	264	0
Emissions (Electricity) ^b	357	681	737	3,194	0
Emissions (Transportation) ^c	295	295	284	1,938	0
Emissions (Pavement)				297	0
Total Emissions				5,693	0
Statewide estimated 2032 annual GHG Emissions:				46,750,000	
Project Emissions as a Percent of Total State GHG Emissions:				0.012%	0.000%

a) Calculation assumes a typical 80.5-year lifespan for the project. The lifespan is based on the King County SEPA GHG Emissions Worksheet (County 2019)

b) Emission factors from King County SEPA GHG Emissions (County 2019)

c) A breakdown of calculations for Transportation Emissions are included in Appendix Table A-1. Factors are based on the current year, 2025, a conservative assumption due to forecast increases in vehicle fuel efficiency and reduction in VMT per person.

Source: Landau Associates, 2025

Vehicle Miles Traveled (VMT)

Table 3.3-2 shows the future contribution to VMT from Alternative 1. Alternative 1 would result in greater VMT than No Action. However, the total VMT contribution to the greater Puget Sound Area is 0.03%. In addition, the purpose of the project is to create higher density housing in the area which it is needed, which will reduce statewide VMT by decreasing the pressure for housing in areas with longer commuting distance. Therefore, it is anticipated that increased VMT associated with Alternative 1, and the potential for increased tailpipe emissions, is not considered significant.

**Table 3.3-2
COMPARISON OF VEHICLE MILES TRAVELED**

	Alt 1	No Action
Puget Sound 2030 daily VMT ^a	94,278,000	94,278,000
Project-related VMT ^b	24,670	0
Contribution of Increase to Regional Tailpipe Emissions	0.03%	0.00%

a) Source: PSRC Regional Transportation Plan (Puget Sound Regional Council 2022)

b) Source: Email from Heffron Transportation Inc. (Heffron 2025)

Source: Landau Associates, 2025

Alternative 2 – No Action Alternative

Under Alternative 2, no redevelopment of the Fort Lawton site would occur at this time. With continuation of current conditions existing air quality conditions would continue and no new project-related air quality or GHG emissions would be generated.

It is also possible that 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 zoning which could result in increases air and GHG emissions.

3.3.3 Mitigation Measures

The following measures have been identified to address the potential impacts on air quality and greenhouse gas emissions (GHGs) from construction and operation of Alternative 1. 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 site 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).

- Sidewalks under the Updated Proposed Action would be located throughout the site that would provide opportunities for non-motorized circulation and reduce vehicular emissions.

- 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 Draft SEIS describes the noise conditions on and near the Fort Lawton site. 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 January 2025 (see **Appendix E**).

Key Findings

The Fort Lawton site is currently vacant; existing sources of noise are limited to wildlife and occasional maintenance. Noise sources adjacent to the site include traffic travelling on nearby roads and residential uses.

During construction, the Updated Proposed Action (Alternative 1) 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 the Updated Proposed Action, but the increase in noise is 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 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).

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 quantitatively 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.

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Source: Landau Associates, 2025.



Figure 3.4-1

Fort Lawton Noise Sensitive Receptors

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: Receiver R-2);
- 40th Avenue West (Existing Residence: Receiver R-1);
- West Government Way (Existing Residences: Receivers R-3 and R-5); and
- 34th Avenue West (Existing Residence: Receiver R-4).

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 site.

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).

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 2024, as well as the traffic-related noise levels under the Updated Proposed Action (Alternative 1) and the No Action Alternative in 2032. (2032 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.)

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

Representative Receptor Location	Modeled Noise Impact in dBA			
	Existing (2024)	Updated Proposed Action (Alternative 1) (2032)	No Action Alternative (2032)	Difference, Updated Proposed Action vs. Existing
Cemetery (Texas Way)	46	53	47	6
R-1 (40 th Avenue West)	56	58	57	1
R-2 (36 th Avenue West)	48	48	48	<1
R-3 (West Government Way/35 th Avenue West)	62	64	62	2
R-4 (34 th Avenue West)	61	62	62	<1
R-5 (West Government Way/33 rd Avenue West)	64	65	64	1

Source: Landau Associates, 2025.

Note: 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 the Updated Proposed Action (Alternative 1) is provided below.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses (Updated Proposed Action)

Construction

Clearing and grading activities, demolition of most of the existing structures, and construction of new infrastructure and housing through project buildout in approximately 2032 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 noise impacts are expected during construction.

Operation

The Updated Proposed Action (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 the Updated Proposed Action, and the

modeled traffic sound levels are all less than the FHWA/WSDOT noise impact criteria sound level of 66 dBA. Therefore, traffic-related noise is not expected to be significant.

Operational noise under the Updated Proposed Action would be generated by multi-family residential, parks/recreation, and senior support service uses at the Fort Lawton site. Noise associated with residences and senior support service offices is expected to be minimal. Active open space (i.e., a grass multi-purpose field) can produce noise associated with maintenance activities, which are subject to timing and noise level restrictions established by the City (see Section 25.08.425). The amplified and unamplified human voices of park users and residents are regulated under the nuisance code in Chapter 25.08, Subchapter V of the SMC. No amplification systems are planned for the Updated Proposed Action. As a result, no significant noise impacts are expected. Under the Updated Proposed Action, existing wooded areas in the north, south and west parts of the Fort Lawton site would be preserved in forest. 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.

Alternative 2 - No Action Alternative

Under the No Action Alternative, no development is proposed for the Fort Lawton site at this time. No temporary clearing/grading, demolition or construction noise would occur. Local roadway noise is expected to increase slightly through 2032 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.

It is possible that 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 zoning which could result in increases noise sources.

3.4.3 Mitigation Measures

The following measures have been identified to address the potential noise impacts from construction and operation of the Updated Proposed Action under Alternative 1. 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 the Proposed Alternative would adhere to the regulations in SMC 25.08.425 and SMC 25.08, Subchapter V, respectively.

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;
 - Install muffles on engines;
 - Substitute quieter equipment or construction methods;
 - Minimize operation time for construction equipment;
 - 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 the Updated Proposed Action, existing wooded areas in the north, south, and west parts of the Fort Lawton site would be preserved in forest. Woodland and vegetated buffers would assist in reducing the impact of noise from the site on the surrounding areas.

3.4.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse noise-related impacts are expected.

3.5 ENVIRONMENTAL HEALTH

This section of the Draft SEIS describes the environmental health conditions on and near the Fort Lawton site. 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.

Under Alternative 1 (Updated Proposed Action), all existing buildings except Building 245 would be removed on the Fort Lawton site. During construction of Alternative 1, impacts could include air pollutants from dust or vehicle emissions, exposure to hazardous materials and/or accidental spills of construction-related chemicals. During operation, environmental health impacts could result from the improper use and disposal of household chemicals, such as cleaners and fertilizers. 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 site and vicinity. 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 SEIS Alternative 1 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 site and identifies the known presence or potential presence of contaminants and/or hazardous materials on the site.

Background

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.

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.

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

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.

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

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.

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

3.5.2 Impacts of the Alternatives

An analysis of the potential adverse environmental health impacts of Alternative 1, Updated Proposed Action, is provided below.

Alternative 1 - Mixed Income Affordable Housing and Public Park Uses (Updated Proposed Action)

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

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.

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 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.

Alternative 2 – No Action Alternative

Under Alternative 2, 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 with continuation of current conditions under Alternative 2.

It is possible that 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 zoning and environmental health impacts could be generated.

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 Alternative 1 (Updated Proposed Action). 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 asbestos-containing material (ACM), lead-based paint (LBP) or polychlorinated biphenyls (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 Model Toxics Control Act (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 Stormwater Pollution Prevention System (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 Draft SEIS describes land uses on and near the Fort Lawton site. Potential impacts from redevelopment of the SEIS alternatives and mitigation measures are 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.

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 (Updated Proposed Action). Most of the existing buildings would be removed for proposed development. Development under Alternative 1 would increase the density and height/bulk/scale of buildings onsite compared to existing buildings and would increase activity levels onsite. Overall, proposed development on the Fort Lawton site is not expected to result in significant adverse impacts on surrounding land uses, 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 adjacent off-site residential uses.

Methodology

The pattern of land uses on the Fort Lawton site and in the site vicinity was described based on site visits conducted in November 2024. An analysis was prepared to evaluate how the EIS alternatives would impact these land uses, either directly, indirectly or cumulatively. This section also compares the consistency of the Updated Proposed Action with relevant federal, Washington State and City of Seattle land use plans, policies and regulations.

3.6.1 Affected Environment

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 SEIS (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 2-3**, Existing Fort Lawton Site Conditions 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. See **Table 3.6-1** for a list of existing buildings on the site.

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% of the Fort Lawton site is currently developed in building footprints, driveways, parking lots, sidewalks and other built areas. The remaining 55% 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 with 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 residential uses, including single-family residences, together with multi-family uses primarily along W Government Way. 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.)

Fort Lawton Army Reserve Center Redevelopment Update Project
Draft Supplemental Environmental Impact Statement



Note: This figure is not to scale

— Project Site ↑ North

Source: City of Seattle, 2017.



Figure 3.6-1
Existing Land Uses

Existing Land Use Designations

Comprehensive Plan Designation

According to the *Draft One Seattle Plan*¹, the Fort Lawton site is designated Neighborhood Residential Area. Neighborhood 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 *Draft One Seattle Plan* also indicates that these areas should provide housing for people of all income levels, in developments compatible with the desired neighborhood character.

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

- **North** – Neighborhood Residential;
- **East** – primarily Neighborhood Residential, 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 Jameson Street;
- **South** – City-Owned Open Space (Discovery Park), with Multifamily Residential to the southwest; and
- **West** – City-Owned Open Space (Discovery Park). Smaller isolated areas within the park are designated for Single-Family Residential uses.

Zoning

According to the *Seattle Land Use Code*, the Fort Lawton site is zoned Lowrise Multi-Family (LR2-M1) and Neighborhood Residential (NR2). The LR2 (M1) zone is applied to the central portion of the site and provides for: 1) a variety of multifamily housing types in existing multifamily neighborhoods and along arterials that have a mix of small-scale residential structures; and 2) accommodate redevelopment in areas within urban centers, urban villages, and station area overlay districts in order to establish multifamily neighborhoods of low scale and density. The NR2 zone provides for predominately detached single-family structures on lot sizes compatible with the existing pattern of development and the character of neighborhood residential area. While single-family residential uses are the primary uses allowed in the NR2 zone, other uses allowed outright by the Seattle Municipal Code include nursing homes and adult daycares.

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

- **North** – NR2 (north of W Lawton Street) and NR3 (north of W Commodore Way);

¹ Note that at the time of publication of this Draft SEIS, the City of Seattle is in the process of updating the Comprehensive Plan (One Seattle Plan). It is anticipated that Seattle City Council final vote on the 2025 Comprehensive Plan (One Seattle Plan) will occur in Summer 2025.

- **East** – NR3 (east of 36th Avenue W);
- **Southeast** – Surrounding W Government Way zoning is Lowrise 3 (LR3);
- **South** – NR2 (Discovery Park) and NR3; and
- **West** – NR2 (Discovery Park).

(See **Figure 3.6-2** for the zoning classifications of the areas immediately adjacent to the site.)

3.6.2 Impacts

An analysis of the potential adverse land use impacts of Alternative 1, the Proposed Action, is provided below.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Updated Proposed Action)

Proposed Actions

As presented in Chapter 2, the Updated Proposed Action evaluated in this Draft SEIS for the Fort Lawton Army Reserve Center Update Project is provided below.

- City Council approval of an updated redevelopment plan;
- City Council authorization of public property conveyances from the U.S. Army to the City of Seattle, including conveyance and/or ground lease agreements for parcels designated for housing development;
- City Council approval of funding for acquisition and development;
- Authorization to accept conveyance of the site from the Army and convey portions of the site for housing development, and execute easements;
- Preliminary and final plat approvals;
- Approval of funding for acquisition and development; and,
- Land use, building, construction and other development permits and approvals.

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. Up to 500 housing units would be provided on the site. 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 two grass unlit multipurpose fields, preserved existing natural areas and the retention of an existing park maintenance facility. New development would be phased over an approximately seven-year buildout period (see **Figure 2-5** Overall Alternative 1 Site Plan and **Figure 2-6** Alternative 1 Site Plan).

Construction Impacts

Demolition of most of the buildings, site preparation and construction of infrastructure and buildings under Alternative 1 (Updated Proposed Action) 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 assumed buildout of the site in 2032. 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

On-site Uses

Development under Alternative 1 (Updated Proposed Action) 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 up to 500 housing units – up to 100 senior/veteran supportive apartments, approximately 200 affordable rental units and 200 affordable ownership units (up to 45 of which would be townhomes).

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 18.32 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 4.17 acres of area would be developed as active park facilities, including two grass unlit multipurpose 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 (Updated Proposed Action) 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 24 dwelling

units per acre.² For comparison, most of the existing single-family residential parcels to the east of the Fort Lawton site (approximately 60%) are 4,000-square foot lots; the remaining parcels (approximately 40%) 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 density of development to the east of the site. The proposed site density would be similar to that of the multi-family residential use to the southeast along W Government Way.

Proposed buildings are assumed to be three to four stories in height, which would be somewhat greater in height than the one- to three-story buildings that are adjacent to the site east of 36th Avenue W. Development on the site would include apartments 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. 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 apartment buildings would be like some of the former military buildings onsite and the existing FLARC VA building to the west of the site, and similar in scale to the three- to four-story multifamily structures along W Government Way to the southeast of the site.

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 east edge of the site where they would be proximate to adjacent existing off-site single-family residences. Higher density development (apartment type buildings) 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 (Updated Proposed Action). This increased activity would occur in the general vicinity of single-family residential uses to the east and north, 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).

² 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.

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 grass unlit multiuse fields. While this use 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 (Updated Proposed Action), 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, Government Way W and Texas Way 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.

Indirect/Cumulative Impacts

Redevelopment on the Fort Lawton site would contribute to the cumulative residential and employment growth in the City of Seattle, and the Magnolia area. An increase in on-site population (residents, employees and visitors) would also contribute to a cumulative increase in activity levels surrounding the site. 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 site in the Magnolia 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 site, some new development in the area could be indirectly generated. However, few sites are available for development/redevelopment and any development in the area generated indirectly by development of the site would likely occur incrementally over time. New development in the vicinity would be controlled by Comprehensive Plan policies and zoning regulations. As a result, significant indirect/cumulative impacts to land uses in the area are not anticipated.

Alternative 2 – No Action Alternative

The Fort Lawton site would remain in its existing vacant condition 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. No new land use impacts are anticipated under Alternative 2 with continuation of current conditions.

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 zoning. Under the existing zoning, over 500 residential units could be developed onsite; other permitted uses with the Lowrise Multifamily (LR2-M1) and Neighborhood Residential (NR2) zoning include public schools, nursing homes and adult care facilities.

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 Update Project. 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.
- New landscaping would be provided on the Fort Lawton 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 Project

- Proposed development would be phased over an approximately seven-year buildout period.
- Proposed housing and active park uses would be focused in the central portions of the site with no direct vehicular connection with the residential areas to the north and east.
- Proposed development would include open space areas on the 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.

3.6.4 Significant Unavoidable Adverse Impacts

Development under Alternative 1 (Updated Proposed Action) would convert the Fort Lawton site from its existing, vacant military storage and maintenance buildings to new residential uses. Development would also include active and passive park uses on the Fort Lawton site. These conversions of uses would result in an intensification of uses and an increase in activity levels on the site. No significant unavoidable adverse land use impacts are anticipated.

3.6.5 Relationship to Plans and Policies

This section evaluates the consistency of the SEIS alternatives with relevant adopted land use plans, policies and development regulations in effect at the time of publication of this FEIS. 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 supplemental NEPA environmental review could be required³. To address the potential of such federal funding, discussions of the relationship of the EIS alternatives to certain federal plans, policies

³ Note that no federal funding has been requested.

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 2050*
- *King County Countywide Planning Policies 2021*

Local Plans, Policies and Regulations

- *Draft One Seattle Plan*
- *City of Seattle Consolidated Plan for Housing and Community Development 2024-2028*
- *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 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 is located in King County, a Washington State coastal zone. However, the site is located outside the jurisdiction of the SMA. The SEIS 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 implemented regulations to guide future development and fulfill the City’s responsibilities under the GMA (the Comprehensive Plan was most recently updated in 2024 with subsequent amendments)⁴. SEIS Alternative 1 (Updated Proposed Action), as described in **Chapter 2** of this Draft SEIS, would satisfy several of the GMA goals, including: directing growth to urban areas

⁴ Note that at the time of publication of this Draft SEIS, the City of Seattle is in the process of updating the Comprehensive Plan (One Seattle Plan). It is anticipated that Seattle City Council final vote on the 2025 Comprehensive Plan (One Seattle Plan) will occur in Summer 2025.

(the Fort Lawton site is located in Seattle, an urban area); encouraging a variety of housing types and densities affordable to all economic segments of the population (Alternative 1 includes a mix of affordable apartments and townhouses); protecting the environment (critical areas on the site have been 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 SEIS alternatives to the One Seattle Plan is discussed in greater detail later in this sub-section.

Regional Plans, Policies and Regulations

Puget Sound Regional Council Vision 2050

Summary: *VISION 2050 (updated in 2020) is the long-range growth management, and economic and transportation strategy for the central Puget Sound region encompassing King, Kitsap, Pierce and Snohomish counties. VISION 2050 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 2050 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: Alternative 1 (Updated Proposed Action) is consistent with VISION 2050 because it would redevelop the Fort Lawton site as denser, affordable housing within a Metropolitan City (Seattle). This would help the City achieve its overall housing target, which was developed in accordance with recommendations from VISION 2050 (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 December 2021, with amendments adopted in 2023 and 2024) 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 2024 with subsequent amendments) 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 2044. Alternative 1 (Updated Proposed Action) 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 in November 2016 (Seattle 2035 Comprehensive Plan: Managing Growth to Become an Equitable and Sustainable City 2015-2035) and is currently being updated, with the Draft One Seattle Plan (2024) under review by the Seattle City Council. The Draft One Seattle 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: Alternative 1 (Updated Proposed Action) would provide a range of housing types/densities (including multi-family apartments and townhouses). The Updated Proposed Action 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 open space would also be provided under Alternative 1 on the Fort Lawton site, including preservation of natural areas.

As mentioned above, multi-family housing would be included under Alternative 1 (Updated Proposed Action). The Fort Lawton site is not located in an urban village. However, existing multi-family housing is present near the site. Also, the Fort Lawton site is designated Neighborhood Residential in the Draft One Seattle Plan, indicating the future use the City envisions for the site (see Section 3.6.2, for details).

Alternative 1 (Updated Proposed Action) would not result in disproportionate impacts to minority or low-income populations. In fact, the affordable housing provided under Alternative 1 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 permanent supportive housing serving formerly homeless individuals that include seniors and veterans 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 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 Alternative 1 (Updated Proposed Action), 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, grass multi-purpose fields would be provided in the central portion of the site, adjacent to proposed housing and parking area. Existing wooded areas in the north and south parts of the site would be preserved in their natural condition. Up to approximately 21.44 acres of the site would be dedicated to the Seattle Department of Parks and Recreation for incorporation into 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.

(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 Neighborhood Residential in the Draft One Seattle *Plan*. Neighborhood 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 Lowrise Multifamily (LR2-M1) and Neighborhood Residential (NR2). The LR2 (M1) zone provides for: 1) a variety of multifamily housing types in existing multifamily neighborhoods and along arterials that have a mix of small-scale residential structures; and 2) accommodate redevelopment in areas within urban centers, urban villages, and station area overlay districts in order to establish multifamily neighborhoods of low scale and density. The NR2 zone provides for predominantly detached single-family structures on lot sizes compatible with the existing pattern of development and the character of neighborhood residential area. While single-family residential uses are the primary uses allowed in the NR2

zone, other uses allowed outright by the Seattle Municipal Code include nursing homes and adult daycares

Proposed development under Alternative 1 (Updated Proposed Action) would feature a range of housing types/densities (including multi-family apartments and townhouses). A mix of affordable housing would be provided, including affordable rental and ownership and formerly homeless housing, along with active and passive public parks uses (see **Chapter 2** for details).

The potential for development under Alternative 1 (Updated Proposed Action) 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 site would result in an intensification of uses and an increase in activity levels. However, no significant adverse land use impacts are expected 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.

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 Updated Proposed Acton (Alternative 1) is described in **Chapter 2** and building massing diagrams are presented in **Section 3.7 – Aesthetics**. The proposed arrangement of buildings in the affordable housing communities under Alternative 1 is designed to place the densest building development toward the central portion of the site, 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 pattern under Alternative 1, 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 Alternative 1, a large portion of the Fort Lawton site (approximately 60% under Alternative 1) 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. The park areas on the site would be available for use by project residents as well as the public. Up to approximately 21.44 acres of the site would be dedicated to Discovery Park. Under Alternative 2 (No Action), the Fort Lawton site would remain undeveloped and the City of Seattle would terminate its lease on the site which would then be in the US Army's possession.

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: Discussion on views, height/bulk/scale, and landscaping is provided below.

Views - A view analysis was prepared for this Draft SEIS based on photographs taken of the Fort Lawton site from selected viewpoints and photo simulations of proposed development under Alternative 1 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 view analysis determined that no significant impacts on views are expected from proposed development at the Fort Lawton site under Alternative 1 (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 would increase the residential density and activity levels on the Fort Lawton site in proximity to existing single-family residences in the surrounding neighborhoods. The height/bulk/scale of the largest proposed buildings (apartments and townhouses) would be similar to existing buildings on the Fort Lawton site; the smallest buildings (townhouses) would be similar to adjacent single-family housing. A mix of densities would be provided with the proposed development. The Proposed Action 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.

Building development on the Fort Lawton site under Alternative 1 (Updated Proposed Action) 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. Limited 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).

Landscaping - Under Alternative 1, the landscaping that would be provided on the Fort Lawton site would be intended to 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 adjacent neighborhood.

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 Alternative 1 (e.g., apartments and townhouses). Alternative 2 would not include propose affordable housing on the Fort Lawton site although the U.S. Army could sell the site with development under site zoning. (see discussion for LU 5.3, LU 5.4 and LU 5.5 for discussion on compatibility of proposed multifamily affordable housing with adjacent uses).

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. (see **Section 3.9, Historic and Cultural Resources**, and **Appendix H** for details).

Under Alternative 1 (Updated Proposed Action), 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 (No Action), the Fort Lawton site would remain undeveloped (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 (Updated Proposed Action), the City of Seattle is proposing to redevelop the vacant, former Fort Lawton Army Reserve Center site as an affordable housing community. Alternative 1 would provide: up to approximately 100 units of permanent supportive housing for formerly homeless seniors and veterans (plus one manager unit); approximately 200 units of affordable rental apartments for low-income households with incomes up to 60% of area median income, including families with children; and approximately 200 units 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. Under Alternative 1, 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 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 site 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 some residents would need a vehicle to access employment and services (e.g. medical and financial), and for grocery shopping. Public transit is available to the site (e.g., on Texas Way, which passes through the Fort Lawton site, and on 34th Avenue W near the site) 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. 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, close to Fort Lawton (see **Section 3.11, Public Services**, for details).

Development of senior and veteran supportive housing under Alternative 1 would include the provision of a comprehensive package of services for resident stability and well-being, including case management services 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 Alternative 1 (Updated Proposed Action), 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 unlit, multi-purpose grass fields under Alternative 1. 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 the Fort Lawton site (see **Chapter 2** for details).

The 2024 Parks and Open Space Plan includes a guideline for park facilities to be within a 10-minute walk from housing. The walkability and gap analysis in the 2017 Plan identified that 94% of all housing units were within a 10-minute walk to a park and that 77% of housing units within an Urban Village were within a 5-minute walk to a park. Considering the number of residents estimated under Alternative 1 (1,538 people) and the citywide guidelines, there would be demand for park space within 10 minutes of the project site. The new demand could be satisfied by the provision of passive recreation areas and active recreation areas onsite for use by the proposed development and the public, as well as the incorporation of approximately 21.44 acres of land owned by the U.S. Army at the Fort Lawton site to Discovery Park. (see **Section 3.8, Recreation and Open Space**, for details).

City of Seattle Consolidated Plan for Housing and Community Development, 2024-2028

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 five primary HUD goals outlined in the 2024-2028 Plan are:

- *Increase services and prevent people from experiencing homelessness*
- *Address needs of people impacted by mental health and substance abuse issues*
- *Equity in access to community infrastructure and recreation opportunities*
- *Increase economic development and job retraining opportunities for low- and moderate-income (LMI) people and those disadvantaged in recovering from recent economic instability*
- *Increase affordable housing options*

City of Seattle strategies for achieving these goals include:

- *Coordinate projects with King County Regional Homeless Authority five-year strategic housing/services plan*
- *Support of community development projects serving neighborhoods at high risk of displacement of LMI and disadvantaged households*
- *Support job opportunities for formerly homeless people and those with disabilities*
- *Prevent loss of inventory of housing units for LMI households*

Discussion: Under Alternative 1 (Updated Proposed Action), affordable housing for low-income and formerly homeless households would be provided on the Fort Lawton site. See the discussion under the Draft One Seattle Plan - Housing for details on the types of affordable housing and the populations served. The supportive housing would include the provision of a comprehensive package of services focused on resident stability and well-being, including case management services 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 site, together with discussion of project consistency with these regulations.*

Existing Zoning – The existing Lowrise 2, Mandatory Housing Affordability 1 [LR2 (M1)] 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 LR2 zones are intended to establish multi-family neighborhoods of low scale and density. LR2 zone density limits one unit per 1,200 square feet of lot area.

Discussion: Under Alternative 1 (Updated Proposed Action), development of multi-family, affordable housing on an area with lowrise residential classification would be consistent with the existing Plan designation of the site. Further, there are existing buffers/separation (e.g. vegetation, topography, and roadways) along the east and west site boundaries that would ease the transition to adjacent single-family zones. The development would be compatible with existing LR3 zoning to the southeast of the Fort Lawton site.

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); and fish and wildlife conservation area (including a heron management area). The potential for proposed development under Alternative 1 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. Tree Protection, is intended to, among other things, to preserve and enhance the City’s physical and aesthetic character by preventing untimely and indiscriminate removal or destruction of trees. SMC 25.11 includes categories of regulated trees, including: Tier 1 – designated heritage trees; and, Tier 2 – trees 24 inches at DSH⁵ or greater, tree groves, and specific tree species as provided in the Director’s Rule. SMC 25.11 indicates that Tier 1 trees may not be removed unless deemed hazardous or in need of emergency action with documentation required, and Tier 2 trees may be removed if removal is part of overall development permit consistent with other provisions of 25.11.*

Discussion: Mature trees are present on the Fort Lawton site. Prior to development on either site, a tree survey would be prepared to determine the presence of any Tier 1 or Tier 2 trees. To the extent feasible, existing trees would be preserved. Where removal of Tier 1 or Tier 2 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.

⁵ Diameter at standard height – 4.5 feet above ground.

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 Property⁶. 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 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 (Updated Proposed Action), public open space would be provided on the Fort Lawton site, including passive and active recreation areas. Up to 21.44 acres of the site would also be incorporated into Discovery Park.

⁶ Resolution Number 31086.

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, supplemental NEPA environmental review would be conducted by the U.S. Army. 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.

The Fort Lawton site is not located within a floodplain. Thus, development at the site is not subject to the flood-related federal laws, regulations and procedures listed above. A wetland may be located in the north portion of the site. See **Section 3.2, Biological Resources**, and **Appendix C**, for information on the protection of this wetland/potential wetland with proposed development.

The Fort Lawton site is not 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 the site. Thus, development at the site 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 the site. 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 site is not located in proximity to a Wild and Scenic River. Thus, development on the site 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 Neighborhood Residential in the Draft One Seattle *Plan* and is zoned LR2-M1 and NR2. No farmland is present on the site and development on the site 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 site vicinity 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 site under the EIS alternatives. The analysis concluded that with implementation of legally-required measures, the Updated Proposed Action (Alternative 1) is not expected to result in significant noise impacts. The site is also not located in an area with substantial noise that could impact proposed development.

The Fort Lawton site is not 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 site 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: The Fort Lawton site is 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 vicinity of the Fort Lawton site is a large contributor to criteria pollutant emissions. Development under Alternative 1 (Updated Proposed Action) 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 *2021 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 site 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 the site. Thus, development at the site 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 site 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. Bald eagle breeding

area is identified off the site in Discovery Park. 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 site, 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. Under Alternative 2, no landscaping would be done and the site would remain in its current condition (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 site 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. 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 Draft SEIS describes the aesthetics/visual resource conditions on and near the Fort Lawton site. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified. The section is based on photo simulations prepared by Facet and SMR in January 2025 (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.

Under Alternative 1 (Updated Proposed Action) most of the existing buildings on the Fort Lawton site would be removed. Development on the site would change the visual character of the site with new townhouses and apartment buildings and open space/park facilities. New sources of light, glare and shadows would be generated by development under Alternative 1; 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 SEIS, 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 Draft SEIS based on photographs taken of the Fort Lawton site from selected viewpoints and photo simulations of proposed development under the Proposed Action 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 Proposed Action 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 Draft SEIS 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 2-6**, Fort Lawton Site Plan in **Chapter 2** of this Draft SEIS, and are intended to represent the general bulk and scale of proposed housing.

Light/Glare and Shadows

Potential light/glare and shadow impacts were conceptually analyzed based on the type and sources of light and shadows under the Updated Proposed Action and the potential for light/glare and shadow impacts on and near the Fort Lawton site.

3.7.1 Affected Environment

This sub-section summarizes the existing aesthetic/light and glare conditions at the 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.

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Source: SMR Architects, 2017.



Figure 3.7-1
Viewpoint Location Map

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 three-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 and multifamily residential neighborhoods. Existing residences are typically two- to four-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.

¹ Seattle Municipal Code Chap. 25.05.675 P.2.a.i. Attachment 1 is at the end of Section 25.05.675.

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 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

² Seattle Municipal Code Chap. 25.05.675 P.2.b.i.

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.

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 (Northwest of Site)
- **Viewpoint 9** – 36th Avenue W (East of Site)

³ Seattle Municipal Code Chap. 25.05.675 P. and Seattle DCLU, 2001,

⁴ City of Seattle, Viewpoints Locator Map.

⁵ Ord. #97025 (Scenic Routes Identified by the Seattle Engineering Department's Traffic Division) and Ord. #114057 (Seattle Mayor's Recommended Open Space Policies).

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 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 3.7-3**).

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, the driveway access to the FLARC VA building and one- and two-story storage and maintenance buildings on the site. Mature trees, grass area and vegetation are visible in the background view (see **Figure 3.7-4**).

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. The view from this location includes the Texas Way paved roadway, which is framed by existing mature trees and vegetation on both sides (see **Figure 3.7-5**).

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 3.7-6**).

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, 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 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 building heights (primarily one- to two-story buildings), and 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. Shadows cast from the site to the residential area to the east are primarily associated to the mature trees lining the east side of the site.

3.7.2 Impacts of the Alternatives

An analysis of the potential adverse aesthetics/light and glare impacts of Alternative 1, the Updated Proposed Action, is provided below.

⁶ Seattle Municipal Code Chapter 25.05.675 Q2.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Updated Proposed Action)

Visual Character

Under the Updated Proposed Action, 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 and veteran supportive housing would consist of one three-story (up to 40-foot tall), u-shaped building located in the west central portion of the site. Affordable rental and ownership multifamily housing would include four, four-story (up to 40-foot tall) buildings in the central portion of the site. Affordable homeownership townhouses would be located along the eastern edge of the site and include three-story (up to 30-foot tall) buildings. 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. **Figure 3.7-2** shows existing affordable housing in the Seattle area that is representative of the housing types that could be developed 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, grass 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 associated with the cemetery would remain unchanged, but new development on the Fort Lawton site would be visible within the mid-ground and background views. Affordable multifamily residential building would be visible to the east of Texas Way and would generally be up to 40 feet tall.

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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.



Figure 3.7-2
Overall Design Examples

To the south of these building would be the two natural-turf multi-purpose fields. The senior supportive housing apartment building would be located to the west of Texas Way, but would largely be obstructed from view in this location by existing mature trees (see **Figure 3.7-3**).

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 and affordable rental. New buildings would generally be located in similar areas as existing buildings on the site, but would be taller and denser. The existing grass open space area would be replaced with two multi-use fields (see **Figure 3.7-4**).

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. 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 3.7-5**).

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 four stories tall (approximately 40 feet tall). These buildings would be somewhat taller 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 partial visual buffer between the site and adjacent uses (see **Figure 3.7-6**).

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Existing



Alt 1

Source: Facet, 2025.



Figure 3.7-3

View from Fort Lawton Cemetery

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Existing



Alt 1

Source: Facet, 2025.



Figure 3.7-4

View from Discovery Park East Boundary

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Existing



Alt 1

Source: Facet, 2025.



Figure 3.7-5

View from Secondary Entrance of Texas Way

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Existing



Alt 1

Source: Facet, 2025.



Figure 3.7-6
View from 36th Ave W

Light and Glare

Redevelopment under the Updated Proposed Action (Updated Proposed Action) 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. 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 permit 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 (Updated Proposed Action), the housing development would generate additional shadows. 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 to 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 and the residential area to the east. However, existing mature trees (including mature trees along the east edge of the site) 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.

Alternative 2 – No Action Alternative

Under Alternative 2 (No Action), no new development would occur on the Fort Lawton site at this time. The site would remain in its existing condition 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 Updated Fort Lawton Project under SEIS Alternative 1. 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.
- 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

Development under the Updated Proposed Action would change the visual character of the Fort Lawton site to new townhouses 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 Draft SEIS describes recreation and open space uses on and near the Fort Lawton site. Potential impacts from redevelopment of the SEIS 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.

Under Alternative 1 (Updated Proposed Action), new residential development on the Fort Lawton site would generate demand for parks and recreation facilities. Under Alternative 1, the demand for parks/recreation area within a 10-minute walk would be satisfied by the site's location proximate to Discovery Park. Additionally, Alternative 1 would add approximately 21.4 acres of parkland, open space, and park facilities to Discovery Park. Under Alternative 2 (No Action), the Fort Lawton site would not create demand for recreation space and would remain undeveloped.

Overall, residential development under Alternative 1 is not expected to result in significant impacts on recreation and open space given the proposed open space and recreation areas proposed.

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 2024 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 site.

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 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 leased to the United Indians of All Tribes 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 SEIS, 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 20.17 acres of the site is in passive open space that includes natural woodland, grass area, and other 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 560-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.

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 2023 and 2024, Seattle’s population increased by 18,500 individuals. Puget Sound Regional Council has projected that an additional 112,000 people will move to Seattle by 2044, with most growth occurring in the city’s urban centers and villages. To address the demand for park space, the City of Seattle 2024 Parks and Open Space Plan establishes a standard for providing parks and park facilities within a 10-minute walk from existing and proposed housing units. The walkability and gap analysis prepared for the Parks and Open Space Plan identified that 94% of all housing units were within a 10-minute walk to a park and that 77% of housing units within an Urban Village were within a 5-minute walk to a park.

3.8.2 Impacts of the Alternatives

An analysis of the potential adverse recreation and open space impacts of Alternative 1, (Updated Proposed Action) is provided below. Discussion on parks and open space conditions under the No Action Alternative (Alternative 2) is also provided.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Updated Proposed Action)

Redevelopment on the Fort Lawton site under Alternative 1 would include 500 new supportive and affordable housing units that would accommodate approximately 1,600 residents.¹ Under Alternative 1, approximately 22.49 acres of parkland and open space would be provided on the site, including 2.92 acres of woodland area, 4.51 acres of grass area, 10.89 acres of other landscape area, and 4.17 acres of active recreation area for community use including the neighboring residents. The SPR maintenance facility would continue to use one of the existing building areas onsite (approximately 2.47 acres).

Existing wooded areas in the north, west and south parts of the site would be enrolled in the Green Seattle Partnership and restored and actively maintained as forested parkland (2.92 acres). The existing passive grass area would be retained (1.93 acres), approximately 2.57 acres of grass area would be provided within the Housing Area, and a larger area (4.17 acres) would be developed for active recreation, including two unlit, grass multi-purpose fields in the central portion of the site, to the south of the housing and parking area. These fields could be configured in a variety of orientations for different uses, including structured and unstructured activities (structured activities include activities such as sports practices and games during daylight hours)². As with other Seattle ballfields, these would be included in the Joint Use Agreement between SPR and SPS. This area would be designed in more detail in the future through a planning and public outreach process, and would be constructed when funding is available. All park area improvements would be designed and constructed to SPR standards, and would be owned and maintained by SPR.

Open areas would also be created amongst the townhouses and multifamily buildings and may include amenities such as a children’s play area(s). Sidewalks and trails would be provided throughout the site.

As mentioned above, the City of Seattle has established a 10-minute walkability guideline

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).

² Active recreation area under the 2018 EIS included field turf with lights for nighttime and more intensive use. The multipurpose fields under the Updated Proposed Action are proposed to be grass fields with no lighting.

throughout the city³. Based on the number of residents (approximately 1,600 people) that would reside on the site with development under Alternative 1 and the citywide LOS, there would be demand for parks and recreation space within a 10-minute walk of the site. 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 incorporation of approximately 21.44 acres of passive parkland and open space, existing maintenance facility, and active recreation (multi-purpose fields) to Discovery Park as part of this proposal (refer to **Table 2-5**). The provision these new passive and active recreation facilities would increase the area and facilities available to the broader public as well as the new residents envisioned in Alternative 1. As a result, no significant recreation and open space impacts are anticipated.

Alternative 2 – No Action Alternative

Under Alternative 2, the Fort Lawton site would remain in its current condition and no development would occur. The site could be conveyed to the City or conveyed or sold by the U.S. Army to another entity in the future and could be developed in accordance with the uses allowed by the site’s zoning, including the potential for some form of open space or park use.

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 Updated Proposed Action under Alternative 1. 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 Updated Proposed Action (Alternative 1)—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.

³ The 2024 Parks and Open Space Plan changed the Level of Service (LOS) from an acres per 1,000 people standard to providing parks and park facilities within a 10-minute walk.

Measures Proposed as Part of Project

- Approximately 18.32 acres of the site would be in passive open space including 2.92 acres of woodland area, 1.93 acres of existing grass area, 2.57 acres of grass area in the Housing Area, and 10.89 acres of other landscape area .
- Approximately 4.17 acres of the site would be developed for active recreation use, including two unlit grass multipurpose fields.
- Incorporation of approximately 21.44 acres of passive parkland and open space, existing maintenance facility, and active recreation (multi-purpose fields) to Discovery Park.

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 Draft SEIS describes historic and cultural resources on and near the Fort Lawton site. Potential impacts from redevelopment under the Updated Proposed Action are evaluated and mitigation measures identified. This section is based on the historic and cultural resources report prepared by Cultural Resource Consultants in January 2025 (see **Appendix G**).

Key Findings

The Fort Lawton site is not on the National Register of Historic Places. The City Landmark status of the buildings on the Fort Lawton site has not been determined, but none of them appear to meet the criteria to be considered eligible for Landmark designation. The Fort Lawton site is considered to have a low potential to contain as-yet unknown archaeological sites.

Under Alternative 1 (Updated Proposed Action), all the existing buildings except Building 245 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. 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 the site is considered low. Overall, significant impacts on historic and cultural resources are not expected for the proposed development at the Fort Lawton 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 departments at the Duwamish Tribal Organization, Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, and Suquamish Tribe were also contacted to inquire about project-related cultural information or concerns on a technical staff-to-technical staff basis (see **Appendix G** 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 site.

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

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

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.

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

The site is located within the traditional territory of the Duwamish, a southern South Coast Salish people who spoke Southern Lushootseed; historically, members of Suquamish and Muckleshoot Tribes also utilized this vicinity. Major Duwamish winter villages were formerly located on the Cedar, Duwamish, Sammamish, and Black Rivers, Lake Sammamish, Lake Washington, Lake Union, Elliott Bay, and Salmon Bay. Each portion of the Duwamish drainage had a name and an associated named community. Near the Fort Lawton site, the north shore of

Salmon Bay was home to a Duwamish band known as the Shilsholamish or Shul-shale. 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, including the Skopamish, Smulkamish, Stkamish, Yilalkoamish, and Twakwamish.

Twentieth century ethnographers documented locations of villages and names for resource areas, water bodies, and other cultural or geographic landscape features from local informants (e.g., Snyder 1968; Waterman ca. 1920, 2001). Knowledge of these features contributes to the broader archaeological context of the project location and the nature of the archaeology that may be encountered. Near the Fort Lawton site, Salmon Bay was a thoroughfare for Puget Sound peoples headed east to Lake Washington via canoe and portage seeking resources and trade with neighboring tribes. In addition, inland peoples travelled by a trail to Salmon Bay in search of marine foodstuffs. Harrington (ca. 1909) provides the name *tsełágotSID* for an inlet that occupied southern Interbay, from which canoes could be portaged to Salmon Bay.

Eight archaeological sites have been recorded within one mile from the Fort Lawton property (Table 1 of **Appendix G**). One precontact archaeological site has been recorded on the Magnolia Bluff uplands near Fort Lawton. Minimal information is available for this archaeological site. This scatter of precontact lithic material was identified in 1950 as a campsite containing stone tools in the center of Magnolia overlooking a historic marsh. In 1958, there was an attempt to revisit the site, but no artifacts or deposits were observed. It was noted that the artifacts had been collected and were in the possession of local residents. This site location is mapped by DAHP as 0.28 miles southeast of the Fort Lawton site, but the margins of the historical marsh mapped by the GLO (**Appendix G** Figure 3) are more compatible with the location description given in 1950. Other precontact archaeological sites in the area are near the Magnolia Bluff and Salmon Bay shorelines. Historic-era archaeological sites associated with Fort Lawton have been identified west of the project. These include a historic building foundation and a historic dump site used by the military. No archaeological sites have been recorded within the site.

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 archeological sites observed. Additionally, widespread signs of prior ground disturbances such as land clearing and grading were 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 archeologic materials would most likely be related to military activities.

(See **Appendix G** for details on existing historic and cultural resources on and near the Fort Lawton site.)

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 APE for the Fort Lawton site is defined as the area within the Fort Lawton site boundary. The Fort Lawton site (and APE) is located in the Magnolia neighborhood in northwest Seattle.

Several Washington State laws specifically address archaeological sites and Native American burials and would pertain to redevelopment of the Fort Lawton site, including the Archaeological Sites and Resources Act [RCW 27.53] and the Indian Graves and Records Act [RCW 27.44].

(See **Appendix G** for details on historic and cultural regulatory context.)

Historic Resources

Site Historic 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 G** 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, 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.

**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 Army Reserve Center Redevelopment Update Project
Draft Supplemental Environmental Impact Statement



Note: This figure is not to scale

North

Source: Cultural Resources Consultants, 2025.

Figure 3.9-1



Fort Lawton Existing Buildings and Adjacent Fort Lawton Cemetery

Fort Lawton Vicinity

Review of DAHP’s Historic Property Inventory shows that 101 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. Twenty-nine historic resources within 500 feet of the site have been recorded in more detail. These include four USARC facilities recorded within the current project, which were determined not eligible for the NRHP in 2012, and one single-family home that was determined not eligible for the NRHP in 2023. Nineteen of the recorded resources have been recommended not eligible for the NRHP by the recorders. Three of the recorded resources have not been evaluated for historic register eligibility; two of these have been demolished since they were recorded in the late 1970s. They have not been evaluated for eligibility for nomination as Seattle Landmarks.

The Fort Lawton Cemetery, located partially within the southwestern part 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 recorded north-northeast of the site on W Commodore Way has been determined eligible for the NRHP.

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 miles west of the site. However, due to the distance from the site there is little potential for impacts from the project.

3.9.2 Impacts of the Alternatives

An analysis of the potential adverse historic and cultural resources impacts of Alternative 1 (Updated Proposed Action) is provided below.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Updated Proposed Action)

Historic Resources

Except for OMS Building 245, all existing buildings and structures on the site would be demolished under Alternative 1. None of these buildings appear to meet eligibility criteria for listing on local, state or federal historic registers either individually or as an historic district. Removal of these buildings would therefore not be anticipated to have a significant impact to historic resources. 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 G**.

Alternative 1 would not directly impact the adjacent Fort Lawton Cemetery. Proposed development in proximity to the cemetery would be limited to passive park uses, unlit multipurpose fields, and Texas Way improvements, which would cause minimal noise and visual

impacts. Alternative 1 will not involve any physical alterations to the cemetery or disturbance within the cemetery and surrounding vegetated buffer.

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.

Alternative 2 – No Action

Under the No Action Alternative, the Fort Lawton site would not be redeveloped at this time and would remain in its 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.

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 Alternative 1. 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

- None of the buildings are recommended eligible for listing as a Seattle Landmark, on the WHR, or on the NRHP. Therefore, no mitigation is identified as required for removal of these buildings. However, because proposed development involves impacts to historic aged structures, it is recommended that the structures proposed for removal be referred to the City's Landmark Preservation Board (LPB) for their consideration as a City Landmark (see **Appendix G** for details).

- 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.

- 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).

- 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.

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 Draft SEIS describes the transportation conditions on and near the Fort Lawton site. Potential impacts from the EIS alternatives are evaluated and mitigation measures identified. The section summarizes analyses and findings presented in the *Transportation Technical Report* prepared by Heffron Transportation, Inc. (see **Appendix H**).

Key Findings

The Fort Lawton site consists of approximately 34 acres within the Magnolia neighborhood in northwest Seattle, and is currently closed, vacant, and leased by the City of 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. Texas Way provides access through the Fort Lawton site.

Traffic analyses reflect future year 2032 conditions, the estimated year of completion and occupancy of the Updated Proposed Action. The analysis horizon year would precede major transportation infrastructure changes associated with Sound Transit's Ballard Link Extension (BLE), which is expected to be complete in 2039; however, construction is currently scheduled to occur from 2027 through 2039, and there could be temporary lane or roadway closures to support BLE construction.

Alternative 1 is estimated to generate 2,266 vehicle trips per day (1,133 inbound and 1,133 outbound) with 183 trips during the AM peak hour and 189 during the PM peak hour. 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.

The project would provide up to 375 parking stalls. No parking is proposed for the multi-purpose field.

Transit and non-motorized facilities would be adequate to accommodate increases in demand resulting from Alternative 1, and code-required bicycle parking would be provided. As a result, no significant parking, transit, or non-motorized impacts are expected during operation of the project.

The project's effect on area traffic operations was evaluated for 12 intersections using level of service (LOS) analysis.

Four of the study-area intersections are currently signalized, and all would operate at LOS C or better during both peak hours in 2032 with the proposed project. These are acceptable levels of service.

Three unsignalized intersections could be degraded to LOS F conditions by Alternative 1:

- W Emerson Place / Gilman Avenue W
- W Nickerson Street / 15th Avenue W Ramps
- W Emerson Street / W Nickerson Street (southbound yield to east-to-south right-turns)

Operations at these intersections could be improved if signalized; however, there are physical constraints, closely-spaced-intersection considerations, and modal preferences (e.g., bicycle and pedestrian flows) for which SDOT may not support signalization and would prefer to tolerate the poor operations for vehicle traffic in favor of non-motorized modes.

Several mitigation measures would be implemented to reduce the transportation impacts including pedestrian improvements, and a transportation management plan (TMP).

The recommended TMP measures to reduce vehicle trip generation may not fully mitigate these delay impacts. Therefore, the project could result in significant unavoidable adverse impacts at the three unsignalized intersections during both the AM and PM peak hours.

Methodology

The transportation analysis was performed using best-practice methodologies developed by the Institute of Transportation Engineers (ITE) and the scope and study area were developed in coordination with Seattle Department of Construction and Inspections (SDCI) transportation review staff. 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 2032, the estimated year of completion and occupancy of the Updated Proposed Action.

Trip generation for the EIS Preferred Action (Alternative 1) was estimated using the recommended methodology in the current edition of the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*.¹ ITE trip generation equations and average rates were applied for the affordable and supportive housing, and the public park and open space, respectively. Trips by non-automobile modes were estimated using a combination of mode-of-travel survey data from the *2022 American Community Survey (ACS)*² and person trip estimates derived for the proposed action.

Trip distribution patterns for the trips to and from the project site were based the U.S. Census Bureau's *OnTheMap* tool,³ and *Google Maps*' predictive travel-route and travel-time mapping resource. The project trips were distributed to the road network and combined with the

¹ Institute of Transportation Engineers, 11th Edition, September 2021.

² US Census Bureau, *2022 ACS 5-Year Estimates Detailed Tables Workers 16 years and over, Data for King County Census Tract 57*, obtained September 2027.

³ U.S. Census Bureau. (2024). LEHD Origin-Destination Employment Statistics (2002-2021) [computer file]. Washington, DC: U.S. Census Bureau, Longitudinal-Employer Household Dynamics Program [distributor], accessed on September 26, 2024, at <https://onthemap.ces.census.gov> . LODES 8.1 [version].

forecast-2032-without-project traffic volumes to reflect future conditions with the Updated Proposed Action (Alternative 1).

Level of service analysis was conducted for the study area intersections for AM and PM peak hour conditions with the Updated Preferred Action (Alternative 1) and compared to results with No Action (Alternative 2). Level of service (LOS) is a qualitative measure used to characterize traffic operating conditions. Six letter designations, “A” through “F,” are used to define level of service. LOS A is the best and represents good traffic operations with little or no delay to motorists. LOS F is the worst and indicates poor traffic operations with long delays. The City of Seattle does not have adopted intersection level of service standards; however, project-related intersection delay that causes a signalized intersection to operate at LOS E or F, or increases delay at a signalized intersection that is projected to operate at LOS E or F without the project, may be considered a significant adverse impact, if increases are greater than 5 seconds. The City may tolerate LOS E or F conditions for automobiles at signalized intersections where physical constraints limit opportunities for widening or where it has established priority for other modes such as transit, pedestrian, or bicycle movements. The City may also tolerate delays in the LOS E or F range at unsignalized intersections where changes such as conversion to all-way-stop-control or signalization are not applicable or desirable. Levels of service for the study area intersections were determined based on methodologies established in the *Highway Capacity Manual (HCM)*, 6th Edition⁴ using the *Synchro 11* analysis software.

(See **Appendix H** for details on the transportation analysis methodology.)

3.10.1 Affected Environment

This sub-section describes existing and future (2032) transportation system and traffic conditions on the Fort Lawton site, and within the project vicinity.

The analysis evaluates the existing and future “No Action” conditions at and near the site. The future conditions reflected for No Action provide the baseline against which the Updated Proposed Action (Alternative 1) is compared.

Roadway Network

Vehicular access to the Fort Lawton site is provided by Texas Way, which connects to Discovery Park Boulevard to the south and 40th Avenue W to the north. The site may be accessed from the south via the Texas Way / W Government Way intersection or from the north via the Texas Way / 40th Avenue W intersection. There are a total of five driveways along the east side of Texas Way (only one is active) and two driveways on the west side of Texas Way that currently serve the VA and its parking lot. There are also three driveways to 36th Avenue W, all of which are closed.

In consultation with staff from the Seattle Department of Construction and Inspections (SDCI), 12 intersections listed below were identified for analysis for AM and PM peak hours. The traffic

⁴ Transportation Research Board 2016.

control for each is noted, and the intersection numbers listed below are used in report tables and graphics for reference.

1. Texas Way / 40th Avenue W (*one-way-stop control*)
2. Texas Way / Discovery Park Boulevard (*one-way-stop control*)
3. W Government Way / 36th Avenue W (*all-way-stop control*)
4. W Government Way / 34th Avenue W (*all-way-stop control*)
5. W Government Way / 32nd Avenue W (*one-way-stop control*)
6. W Emerson Place / Gilman Avenue W (*all-way-stop control*)
7. 21st Avenue W / W Emerson Place (*signalized*)
8. W Emerson Street / W Nickerson Street (*all-way-stop control*)
9. W Nickerson Street / 15th Avenue W Ramps (*all-way-stop control*)
10. 15th Avenue W (Southbound [SB] Ramps) / W Dravus Street (*signalized*)
11. 15th Avenue W (Northbound [NB] Ramps) / W Dravus Street (*signalized*)
12. W Garfield Street / 15th Avenue W (*signalized*)

The existing and planned roadways in the Fort Lawton study area were inventoried and are described in **Appendix H**. No major changes are planned for area streets or intersections.

Traffic Volumes

Peak period turning movement counts were conducted for the analysis. The count data indicate that the study-area AM peak hour typically begins at 7:45 or 8:00 A.M.; the study-area PM peak hour begins between 4:00 and 5:00 P.M. (see **Appendix H** for the existing (2024) and 2032 No Action traffic volumes).

Future traffic volumes were forecast for the year 2032. Based on historical traffic growth data, the highest observed growth rate was selected for application to forecast year 2032 traffic volumes—0.6% compounded annually from 2024 to 2032. This growth rate is intended to account for the most recent post-pandemic changes in the Seattle area traffic, including Amazon’s return-to-office five days per week beginning in early January 2025. Based on review of the City’s Property and Building Activity portal, no major development projects planned or in process in the area were identified that would contribute noticeable increases in traffic at study-area intersections by year 2032. The analysis horizon year would precede major transportation infrastructure changes associated with Sound Transit’s Ballard Link Extension that could further temper traffic volume growth in the corridor and surrounding roadways.

Traffic Operations

Table 3.10-1 summarizes level of service results for existing and 2032 No Action (without the Updated Proposed Action) conditions. As shown, the four signalized intersections currently operate at LOS C or better during both peak hours, and are anticipated to operate at LOS C or better in year 2032 without the proposed project. The unsignalized intersections currently operate at LOS D or better overall, except at two intersections: W Emerson Street / W Nickerson Street (intersection ID #8) and W Nickerson Street / 15th Avenue W Ramps (#9).

**Table 3.10-1
LEVEL OF SERVICE NEAR FORT LAWTON SITE – EXISTING & 2032 NO ACTION**

Int. #	Intersection / Control Type	AM Peak Hour				PM Peak Hour			
		Existing (2024)		2032 No Action		Existing (2024)		2032 No Action	
	Signalized	LOS ¹	Delay ²	LOS	Delay	LOS	Delay	LOS	Delay
7	21 st Ave W / W Emerson Pl	B	17.2	B	17.9	C	21.1	C	22.1
10	15 th Ave W (SB Ramps) / W Dravus St	A	0.0	B	18.1	A	0.0	C	27.2
11	15 th Ave W (NB Ramps) / W Dravus St	A	0.0	B	17.5	A	0.0	C	33.5
12	W Garfield St / 15 th Ave W	A	9.8	B	10.2	B	14.1	B	15.0
	All-Way Stop-Controlled	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
3	W Government Wy / 36 th Ave W	A	8.1	A	8.1	A	8.4	A	8.5
4	W Government Way / 34 th Ave W	B	11.1	B	11.6	B	11.0	B	11.5
6	W Emerson Pl / Gilman Ave W	D	27.1	D	33.6	D	27.2	D	33.5
8	W Emerson St / W Nickerson St ³	B	13.9	B	14.7	C	17.0	C	18.8
9	W Nickerson St / 15 th Ave W Ramps	D	34.2	E	42.2	E	41.6	F	50.9
	Side-Street Stop-Controlled	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
1	Texas Wy / 40 th Ave W (overall)	A	4.4	A	4.5	A	3.3	A	3.3
	Westbound Approach	A	8.9	A	9.0	A	8.9	A	9.0
	Southbound Left-turn	A	7.3	A	7.3	A	7.4	A	7.4
2	Texas Way / Discovery Pk Blvd (overall)	A	1.3	A	1.3	A	1.5	A	1.5
	Eastbound Left-turn	A	0.0	A	0.0	A	0.0	A	0.0
	Southbound Approach	A	9.5	A	9.5	A	9.9	A	10.0
5	W Government Way / 32 nd Ave W (overall)	A	1.1	A	1.1	A	1.1	A	1.1
	Northwest Approach	B	12.9	B	13.3	B	13.6	B	14.0
	Southbound Left-turn	A	8.5	A	8.6	A	8.4	A	8.4
	Yield-Controlled	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
8	W Emerson St / W Nickerson St ³ (overall)	A	8.0	B	10.5	A	4.0	A	4.7
	Southbound – Yield to EBR	E	43.5	F	56.9	D	26.6	D	30.8

Source: Heffron Transportation, Inc., October 2024.

1. Level of service.
2. Average seconds of delay per vehicle.
3. Location evaluated as two separate intersections to reflect operations of all movements. EBR = Eastbound Right.

At the W Emerson Street / W Nickerson Street intersection, traffic that turns left from westbound W Emerson Street onto the W Nickerson Street structure must then yield to traffic that turns right from eastbound Emerson Street onto the same structure. That yield point is forecast to operate at LOS F during the AM peak hour in 2032. Similarly, the W Nickerson Street / 15th Avenue W Ramps all-way-stop intersection is anticipated to degrade from an existing LOS D to LOS E in 2032 during the AM peak hour, and from LOS E to LOS F during the PM peak hour due to assumed background traffic growth.

Parking

There is one publicly-accessible parking lot on the existing site, between the maintenance facility and the structures to the south, with 73 parking spaces. Three other parking lots on the site are closed to the public and have an unknown number of parking spaces.

Traffic Safety

Five years of collision data for the study-area intersections and roadway segments along the project site frontages were obtained from SDOT's Open Data Portal and WSDOT's crash data portal. None of the studied intersections met the criteria for a high-collision location for the period evaluated. There was one fatal collision at the signalized 15th Avenue W / W Garfield Street intersection that involved a vehicle striking a bridge pillar while travelling at a high rate of speed. Overall, these data do not indicate any unusual traffic safety conditions for the study area.

Transit Facilities and Service

King County Metro (Metro) Route 33 provides two-way bus service along Texas Way 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*⁵ indicates that the existing level of bus service is planned to remain through its interim network, which is targeted for delivery before Sound Transit's BLE project commences in 2039. It also identifies that upon completion of the BLE, "frequent" bus service (defined as headways of 5-15 minutes) would be along a route that includes W Government Way and 34th Avenue W. This bus service is expected to provide a direct transfer to the Link.

Sound Transit is currently evaluating three possible alignments for the BLE project through the Interbay neighborhood. The current BLE Preferred Alternative would be in a tunnel near Emerson Street. Although the BLE project is not expected to be completed until 2039, beyond the horizon year of this analysis, construction is currently scheduled to occur from 2027 through 2039, and there could be temporary lane or roadway closures to support construction.

Non-Motorized Transportation

Near the site, there is a continuous four-foot-wide sidewalk on the park side of Texas Way between Discovery Park Boulevard and the north gate to Fort Lawton; about 200 feet between the gate and 40th Avenue W has no sidewalk or shoulders. There are no sidewalks on either side of Texas Way between 40th Avenue W and the Discovery Park North Parking Lot. There are no sidewalks on either side of 40th Avenue W between Texas Way and W Lawton Street.

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. There is a curb ramp on the northwest corner of the Texas Way / Discovery Park Boulevard intersection, but there is not an

⁵ King County Metro, Metro Connects: Long-Range Plan, Adopted November 17, 2021.

accessible (Americans with Disabilities Act (ADA) compliant) connection to the multi-use path on the south side. 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 an extensive non-motorized trail system within Discovery Park just west of the site. The trail system can be accessed from Discovery Park Boulevard and Texas Way.

Pedestrian and bicycle counts were performed for this study at the same time the vehicle counts were performed. The counts indicated that almost all pedestrians who cross the 36th Avenue W / Discovery Park Boulevard intersection do so across the east and south legs.

(See **Appendix H** for details on the existing transportation system and traffic conditions on and near the Fort Lawton site.)

3.10.2 Impacts of the Alternatives

An analysis of the potential adverse transportation impacts of Alternative 1, the Applicant's Updated Proposed Action, is provided below.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Updated Proposed Action)

Construction

Alternative 1 would generate construction truck and employee traffic associated with demolition, excavation, infrastructure construction, building construction, and landscaping. Internal roadways would be upgraded and replaced. The highest number of truck trips per day would likely 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 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 the site would generate more trips per hour than evaluated for the completed with-project condition. Therefore, the vicinity roadway systems would be able to accommodate construction traffic generated by the site. All truck staging and contractor parking is planned to be accommodated on 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. Details that should be included in the plan are described in the *Mitigation* section (Section 3.10.3). As a result, no significant

transportation impacts are expected during construction of the project (see **Appendix H** for details).

Operations

Access and Circulation

With Alternative 1, Texas Way would continue to serve as the primary vehicular access street for the site, and no vehicular access would be provided from 36th Avenue W. The senior / veteran supportive housing and its parking would be located on the west side of Texas Way while the affordable ownership and rental units along with their parking would be located on the east side of Texas Way. Pedestrian facilities would be provided within the residential development and upgraded along Texas Way as required by the City of Seattle. The existing King County Metro bus stops would be retained on both sides of Texas Way, approximately in their current locations.

Project Trips

The number of vehicle trips forecast to be generated by Alternative 1 is summarized in **Table 3.10-2**. As shown, Alternative 1 is estimated to generate 2,266 vehicle trips per day (1,133 inbound and 1,133 outbound) with 183 trips during the AM peak hour and 189 during the PM peak hour.

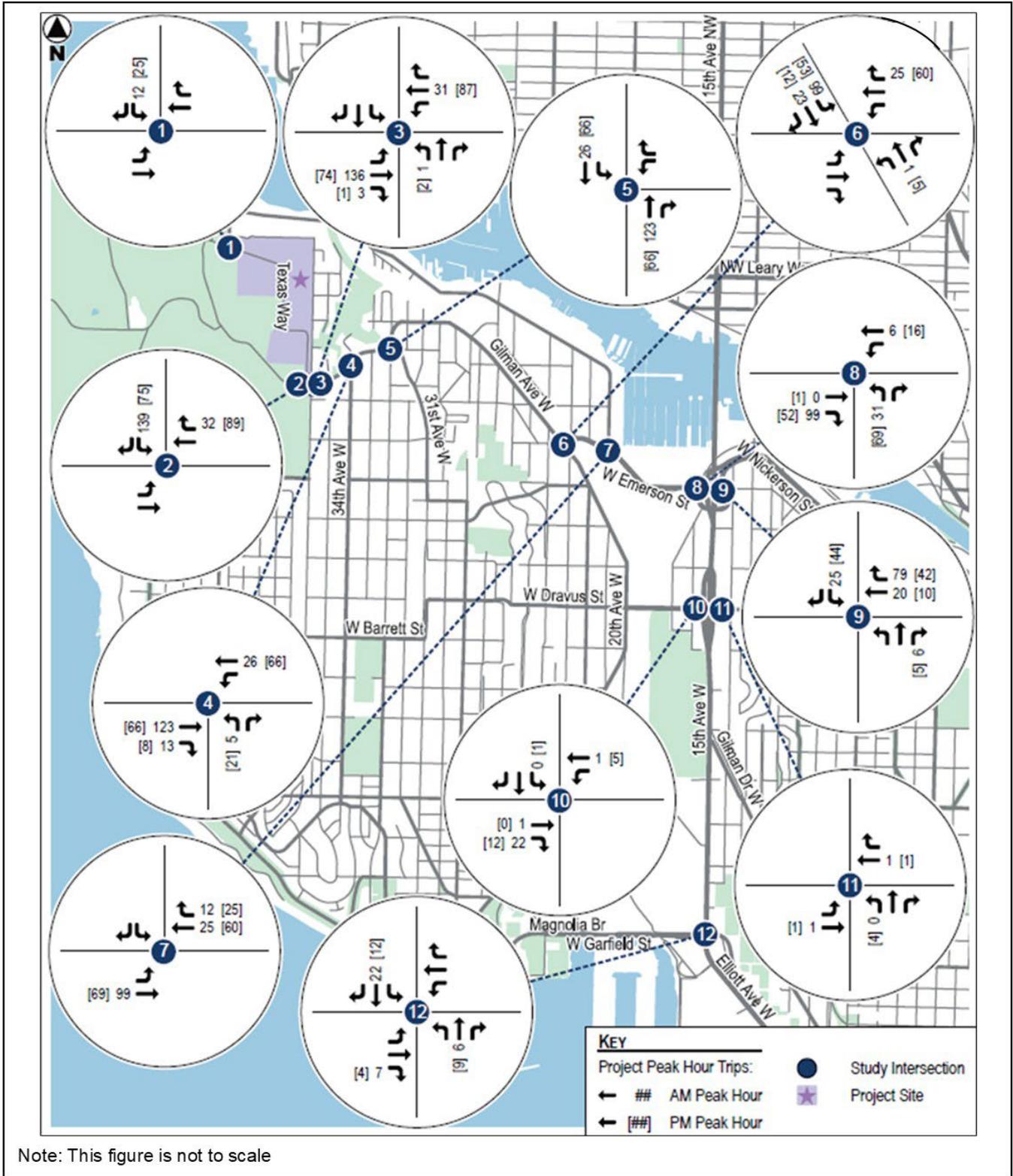
**Table 3.10-2
VEHICLE TRIP GENERATION FOR FORT LAWTON – ALTERNATIVE 1**

Proposed Housing Types	Size	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
Workforce – Townhomes	45 units	290	4	14	18	14	9	23
Workforce – Multi-Family	355 units	1,650	33	112	145	85	54	139
Formerly Homeless Seniors	100 units	310	7	13	20	14	11	25
Park and Open Space	20.7 acres	16	0	0	0	1	1	2
Total Vehicle Trips		2,266	44	139	183	114	75	189

Source: Heffron Transportation, Inc., December 2024.

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. (see **Appendix H** for the trip distribution patterns under Alternative 1). Trips were assigned to the roadway network (see **Figure 3.10-1**, Fort Lawton Trip Assignment – Alternative 1).

**Fort Lawton Army Reserve Center Redevelopment Update Project
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Source: Heffron Transportation, 2025.

Figure 3.10-1

Fort Lawton Trip Assignment – Alternative 1



Traffic Operations

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 3.10-3**). As shown, all study area signalized intersections would continue to operate at LOS C or better with slight increases in delay associated with Alternative 1. Most of the unsignalized intersections would continue to operate at similar levels of service (LOS C or better) with Alternative 1.

Three unsignalized intersections are forecast to operate at LOS E or F with the project. The W Emerson Place / Gilman Avenue W all-way-stop intersection is anticipated to degrade from LOS D to LOS F during both the AM and PM peak hours with the project. The W Nickerson Street / 15th Avenue W Ramps all-way-stop intersection is anticipated to operate at LOS F during both peak hours. Operations at both intersections could be improved if signalized (LOS E or better at Emerson / Gilman and LOS B at 15th/Nickerson). However, there are physical constraints, closely-spaced-intersection considerations, and modal preferences (e.g., bicycle and pedestrian flows) for which SDOT may not support signalization and would prefer to tolerate the poor operations for vehicle traffic in favor of non-motorized modes. However, the City may consider the vehicular delay impacts to these locations as significant adverse impacts.

At the W Emerson Street / W Nickerson Street intersection, the south-bound yield to the east-to-south right-turning movement is anticipated to operate at LOS F during the AM peak hour and LOS E during the PM peak hour with the project. Due to the location of these movements, their proximity to the other stop-controlled movements, and their location on bridge structural elements, there is likely limited opportunity to make physical changes to address the poor operations, including traffic signalization. In the long-term, the *Ballard Bridge Planning Study*⁶ included options that could reconstruct the W Nickerson Street / 15th Avenue E interchange and eliminate the all-way-stop intersections.

Since traffic volumes in the immediate site vicinity could be influenced by seasonal or event-related use of Discovery Park, a separate sensitivity analysis was completed to understand how traffic fluctuations around the site could influence intersection operations with the proposed Fort Lawton Housing project. The three intersections nearest the site—Texas Way / 40th Avenue W, Texas Way / Discovery Park Boulevard, and W Government Way / 36th Avenue W—were evaluated to determine how they would operate with higher than anticipated growth. Sensitivity analysis was performed assuming incremental growth up to 50% more traffic than the forecast-2032-with-project conditions. Even with a 50% increase in traffic, all movements at the three near-site study intersections would continue to operate at LOS B or better during both the AM and PM peak hours. Therefore, the intersections near the site are shown to have substantial vehicle-traffic volume capacity available and peak season resiliency, even during peak park activity in the summer months.

⁶ SDOT.

**Table 3.10-3
LEVEL OF SERVICE – 2032 CONDITIONS**

Int. #	Intersection / Control Type	AM Peak Hour				PM Peak Hour			
		No Action		With-Project		No Action		With-Project	
	Signalized	LOS ¹	Delay ²	LOS	Delay	LOS	Delay	LOS	Delay
7	21 st Ave W / W Emerson Pl	B	17.9	B	18.2	C	21.1	C	21.6
10	15 th Ave W (SB Ramps) / W Dravus St	B	18.1	B	18.1	C	27.2	C	27.2
11	15 th Ave W (NB Ramps) / W Dravus St	B	17.5	B	17.6	C	33.5	C	33.8
12	W Garfield St / 15 th Ave W	B	10.2	B	10.2	B	15.0	B	15.1
	All-Way Stop-Controlled	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
3	W Government Wy / 36 th Ave W	A	8.1	A	9.3	A	8.5	A	9.8
4	W Government Way / 34 th Ave W	B	11.6	C	15.2	B	11.5	B	13.8
6	W Emerson Pl / Gilman Ave W	D	33.6	F	64.6	D	33.5	F	56.1
8	W Emerson St / W Nickerson St ³	B	14.7	C	15.8	C	18.8	D	27.4
9	W Nickerson St / 15 th Ave W Ramps	E	42.2	F	62.4	F	50.9	F	64.7
	Side-Street Stop-Controlled	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
1	Texas Wy / 40 th Ave W (overall)	A	4.5	A	5.0	A	3.3	A	3.9
	Westbound Approach	A	9.0	A	9.1	A	9.0	A	9.1
	Southbound Left-turn	A	7.3	A	7.3	A	7.4	A	7.4
2	Texas Way / Discovery Pk Blvd (overall)	A	1.3	A	5.4	A	1.5	A	3.1
	Eastbound Left-turn	A	0.0	A	0.0	A	0.0	A	0.0
	Southbound Approach	A	9.5	B	11.0	A	10.0	B	11.2
5	W Government Way / 32 nd Ave W (overall)	A	1.1	A	1.1	A	1.1	A	1.1
	Northwest Approach	B	13.3	C	15.3	B	14.0	C	15.2
	Southbound Left-turn	A	8.6	A	9.1	A	8.4	A	8.7
	Yield-Controlled	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
8	W Emerson St / W Nickerson St ³ (overall)	B	10.5	C	15.4	A	4.7	A	5.0
	Southbound – Yield to EBR	E	56.9	F	91.2	D	30.8	E	36.3

Source: Heffron Transportation, Inc., January 2025.

1. Level of service.
2. Average seconds of delay per vehicle.
3. Location evaluated as two separate intersections to reflect operations of all movements. EBR = Eastbound Right.

Parking

Based on the City’s Land Use Code, no parking is required for the project. However, the project would provide 0.75 stalls per residential unit for a total of up to 375 parking stalls⁷. No parking is proposed for the multi-purpose fields.

⁷ Seattle Land Use Code; Chapter 23.54.015, Version February 12, 2025.

Traffic Safety

The project would increase traffic at the study-area intersections and statistically, the number of collisions could increase as traffic increases. However, historical collision data do not indicate unusual existing traffic safety issues in the site vicinity. Alternative 1 would not change the roadway network, although new site access driveways would connect residential parking areas to Texas Way. The volumes at these intersections are expected to be relatively low and operate similar to other intersections in the residential neighborhood. The project is not expected to result in new adverse impacts to traffic safety conditions in the neighborhood.

Transit

Alternative 1 is expected to generate about 146 transit trips per day, and about 6 transit trips during the AM and PM peak hours. The existing bus service would be adequate to serve this demand; therefore, no adverse transit impacts are expected from the proposed Alternative 1.

Non-Motorized Transportation

For Alternative 1, 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.

Several new pedestrian crosswalks are proposed to connect with housing clusters and transit stops. All new crosswalk locations would be required to provide adequate sight lines for motorists and pedestrians, and would be designed to meet *Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways*⁸ 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 at new and retained existing crosswalk locations.

The project would provide the code-required number of long-term secure and short-term bicycle parking spaces.

Alternative 2 - No Action Alternative

With the No Action Alternative, no redevelopment would occur, and 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 Base Realignment and Closure (BRAC) process. The City would terminate its lease of the property, and the Army would resume maintenance of the site and facilities. 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 zoning. No transportation-related impacts are anticipated with Alternative 2.

⁸ US Department of Transportation – Federal Highway Administration, 11th Edition, December 2023. (Sign-design details update on December 20, 2024.)

3.10.3 Mitigation Measures

The following measures have been identified to address the potential transportation impacts from construction and operation of the Updated Proposed Action (Alternative 1). 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.

Legally-Required Measures

- Development would comply with all land use code requirements regardless of right-of-way improvements including any 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.
- **Implement Transportation Management Plan (TMP)** – The Seattle Office of Housing would prepare a TMP consistent with the City of Seattle’s Director’s Rule (SCDI Director’s Rule 05-2021 / SDOT Director’s Rule 01-2021). It would define the trip reduction goal and strategies. Seattle Municipal Code (SMC) *Chapter 23.52* outlines requirements for transportation concurrency and transportation impact mitigation. Developments with more than 30 dwelling units must contribute to achieving the single-occupancy vehicle (SOV) trips percentage targets shown on Map A for §23.52.004. The SOV goal for the Magnolia neighborhood is 38% by the year 2035. This means that 62% of the trips would need to use non-SOV modes of travel. For comparison, the SOV rate reflected by the standard ITE rates and equations used for this analysis ranges from 75% to 85%.⁹ See **Appendix H** for potential strategies that could be included in the TMP.

Measure Proposed as Part of Project

Improve pedestrian facilities on Texas Way – For Alternative 1, Texas Way would be improved to add a sidewalk or walkway to the east side of the street adjacent to new development areas.

⁹ The baseline ITE vehicle trip generation rates and equations used for this analysis are based on surveys of sites in general suburban locations and do not reflect any transit use. They account for minimal walk, bike, and carpool use.

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.

3.10.4 Significant Unavoidable Adverse Impacts

The Fort Lawton Housing Redevelopment Updated Proposed Action (Alternative 1) may result in vehicular delay impacts to the following three unsignalized (all-way-stop-controlled) intersections that degrade operations to LOS F:

- W Emerson Place / Gilman Avenue W
- W Nickerson Street / 15th Avenue W Ramps
- W Emerson Street / W Nickerson Street (southbound yield to east-to-south right-turns)

Operations could be improved if signalized; however, there are physical constraints, closely-spaced-intersection considerations, and modal preferences (e.g., bicycle and pedestrian flows) for which SDOT may not support signalization and would prefer to tolerate the poor operations for vehicle traffic in favor of non-motorized modes. Therefore, the City may consider the vehicular delay impacts to these locations as significant adverse impacts. The recommended TMP measures to reduce vehicle trip generation may not fully mitigate these delay impacts. Therefore, the project could result in significant unavoidable adverse impacts at these locations during both the AM and PM peak hours.

3.11 PUBLIC SERVICES

This section of the Draft SEIS describes the public services that serve the Fort Lawton site and vicinity, including police, fire and emergency medical services, and public schools. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified.

Key Findings

Development under Alternative 1 (Updated Proposed Action) and associated increases in on-site population would result in an increase in demand for public services, including demand for police services, demand for fire and emergency medical services, and new student generation at public schools. However, increased demand is anticipated to be modest in nature and service providers would be anticipated to have the capacity to serve the increases in demand. With the implementation of mitigation measures identified in this section, it is anticipated that significant unavoidable adverse public service-related impacts would not be expected.

Methodology

The analysis of public services is based on information obtained from the public service providers, including the Seattle Police Department (SPD), Seattle Fire Department (SFD), and Seattle Public Schools (SPS). Information from the most current capital facilities plans, annual reports, strategic plans, enrollment data/forecasts, and website data for each of the public service purveyors was used for the analysis; this information was also supplemented with information from other public sources (e.g., Washington Association of Sheriffs and Police Chiefs), as necessary.

3.11.1 Affected Environment

This sub-section describes existing public services that serve the Fort Lawton site and site vicinity, including police service, fire and emergency medical services, and public school services.

Police Service

The SPD provides services from 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

Based on data for 2023, SPD had approximately 1,065 commissioned officers on staff to serve the city population of approximately 779,200. This equates to a commissioned officer per 1,000 population staffing rate of approximately 1.37 officers per 1,000 population.² For the West Precinct is staffed by approximately 185 officers with the minimum number of officers assigned to a given shift being 18 officers which occurs during 1st Watch (between 3 AM and 11 AM). Based on their most recently available Strategic Action Plan (2019), SPD established the goal to increase department staffing by hiring approximately 10 to 15 new officers each year.³

SPD continues to utilize Micro Community Policing Plans (MCP) which were originally established in 2015 based on the notion that public safety can be enhanced, and crime can be reduced through collaborative police-community attention to distinct needs of Seattle neighborhoods. MCPs are tailored to meet the needs of each micro community through community engagement, crime data, and police services. A central component is the annual Seattle Public Safety Survey that is administered by Seattle University to collect data from residents on public safety issues, perceptions of police, and neighborhood features/crime to understand what issues are most important to each community. The Fort Lawton site is located in the Magnolia Micro Community Policing Plan area. Based on the most recent Seattle Public Safety Survey, the top public safety concerns were police capacity, property crime, drugs and alcohol, traffic safety, and community capacity.⁴

Table 3.11-1 summarizes the annual number of computer-aided dispatch (CAD) events for SPD over the past five years and illustrates the increases and decreases in CAD events year over year. Overall, since 2020, CAD events have decreased by approximately four percent.

**Table 3.11-1
SPD CAD EVENTS: 2020 – 2024**

	2020	2021	2022	2023	2024
CAD Events	343,100	331,613	339,799	366,129	330,371
% Change over Previous Year		-3%	2%	8%	-10%

Source: Seattle Police Department, 2024.

¹ Seattle Police Department, January 2025.

² Washington Association of Sheriffs and Police Chiefs, January 2025.

³ Seattle Police Department, 2019.

⁴ Seattle University, 2023.

More specifically, **Table 3.11-2** summarizes the annual CAD events over the last five years for the West Precinct, which includes the Fort Lawton site and vicinity. Over the past five years, CAD events for the West Precinct have increased by approximately one percent; however, more recently over the last two years they have actually declined by approximately 10 percent.

**Table 3.11-2
SPD WEST PRECINCT CAD EVENTS: 2020 – 2024**

	2020	2021	2022	2023	2024
CAD Events	92,057	93,858	103,359	104,228	93,399
% Change over Previous Year		2%	10%	1%	-10%

Source: Seattle Police Department, 2024.

Fire and Emergency Medical Service

The 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. SFD provides services from 33 fire stations located throughout the City. In 2023, the SFD was comprised of 995 uniformed personnel and 85 civilian personnel. Uniformed personnel include 898 firefighter/EMTs, 36 Chiefs, and 61 firefighter/ paramedics. Each day there are approximately 216 members on duty to respond to fire and emergency medical calls. Based on a City population of approximately 779,200 people, the current SFD uniformed personnel staffing levels would equate to approximately 1.28 uniformed personnel per 1,000 population.

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 – located approximately 1.5 miles to the south). Station 3 is located approximately 1.2 miles to the east of the site but serves as the base of operations for the SFD’s fireboats on the freshwater side of the Ballard Locks.

Historically, call volumes for SFD have increased over the past five years. **Table 3.11-3** summarizes annual call volumes for SFD since 2019. As noted in the table, call volumes have steadily increased in four of the past five years with an overall increase of approximately 22 percent since 2019.

**Table 3.11-3
SFD ANNUAL CALL VOLUMES: 2020 – 2024**

	2019	2020	2021	2022	2023
Total Number of Calls	169,153	165,846	186,571	202,344	206,482
% Change over Previous Year		-2%	12%	8%	2%

Source: Seattle Fire Department, 2023.

Table 3.11-4 summarizes the number and types of responses for SFD over the past five years. As shown in the table, the majority of the responses for SFD have been for basic life support responses. The number of responses for SFD have steadily increased since 2019 by approximately 21 percent overall.

**Table 3.11-4
SUMMARY OF SFD RESPONSES: 2019 – 2023**

	2019	2020	2021	2022	2023
Fire	18,088	18,094	24,255	27,180	28,107
Basic Life Support	56,631	50,900	56,208	64,127	66,336
Advanced Life Support	16,349	10,817	12,356	14,681	16,407
Special Operations¹	-	-	361	407	385
Mutual Aid	648	505	53	58	84
Total	91,716	80,316	93,233	106,453	111,319
% Change over Previous Year		-12%	16%	14%	5%

Source: Seattle Fire Department, 2023.

¹ Special responses were previously included under Fire in 2019 and 2020 but were added as a separate category in 2021.

Public Schools

Public school services are provided to the Fort Lawton site and surrounding areas by SPS. SPS is the largest K-12 school system in the State of Washington and contains approximately 104 schools at various grade levels, including 63 elementary schools (K-6), 11 K-8 schools, 12 middle schools, and 18 high schools; they also offer 22 option schools. SPS serves a total student enrollment population of approximately 49,226 students, including approximately 23,283 in grades K-5th, 10,648 in grades 6th-8th, and 15,295 in grades 9th-12th. SPS staffing at their schools is provided by approximately 6,486 school-based staff.

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).

Table 3.11-5 summarizes the existing estimated right size capacity⁵ of the schools that currently serve the Fort Lawton site and vicinity based on SPS’s most recent (2021) Facilities Master Plan.

**Table 3.11-5
CAPACITY OF SCHOOLS THAT SERVE THE FORT LAWTON SITE**

	Estimated Right Size Capacity
Lawton Elementary	396 students
McClure Middle School	615 students
Ballard High School	1,606 students

Source: Seattle Public Schools, 2021.

Table 3.11-6 presents the most recent enrollment data for the schools that would serve the Fort Lawton site, as well as enrollment projections for those schools through the 2033-34 school year. As noted in the table, enrollment at Lawton Elementary showed a slight decrease over the past two years and is projected to decrease even further by the 2033-34 school year. McClure Middle School and Ballard High School both showed a modest increase in enrollment over the past two years but are also projected to have a decrease in enrollment by the 2033-34 school year. All three schools are projected to be substantially below their right size capacity by the 2033-34 school year.

**Table 3.11-6
ENROLLMENT AND PROJECTIONS FOR SCHOOLS 2023-24 – 2033-34**

	2023-24 Actual	2024-25 Actual	2025-26 Projection	2026-27 Projection	2027-28 Projection	2028-29 Projection	2033-34 Projection	Change from 2023-24
Lawton Elem.% Change	325	313 -4%	305 -3%	297 3%	295 1%	292 1%	301 3%	-24 -7%
McClure MS% Change	461	474 3%	462 -3%	435 -6%	426 -2%	409 4%	402 -2%	-59 -13%
Ballard HS% Change	1,618	1,629 1%	1,570 -4%	1,590 1%	1,539 -3%	1,498 -3%	1,396 -7%	-222 -14%

Source: Seattle Public Schools, 2024.

⁵ 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.

As part of their enrollment forecasts, SPS utilizes data to establish student generation rates within the District boundaries. Their 2024-25 to 2033-34 Enrollment Forecasts Report identified that income-restricted multifamily housing with two or more bedrooms has the high average number of SPS K-12 students per home with a student generation rate of 0.791 students per income-restricted multifamily residence.⁶

3.11.2 Impacts of the Alternatives

An analysis of the potential adverse public service impacts of Alternative 1 (Updated Proposed Action) and Alternative 2 (No Action Alternative) is provided below.

Alternative 1 - Mixed Income Affordable Housing and Public Park Uses (Updated Proposed Action)

Under Alternative 1, the City of Seattle Office of Housing is planning to develop up to 500 housing units on the Fort Lawton site. For the purposes of this public services analysis, it is assumed that all units would multifamily or townhome residences. The proposed breakdown of residential units includes:

- Up to 100 units of formerly homeless senior/veteran housing,
- 200 units of affordable ownership housing for first time homeowners with 45 of these units being townhouse, and
- 200 units of affordable rental units

Calculations for the assumed population that would be generated with development of Alternative 1 are identified in Chapter 2 and are based on comparable rent-restricted affordable housing. It is anticipated that approximately 1,600 residents would live on the Fort Lawton site at full buildout (see Chapter 2 for details on the assumptions for the calculation of residential population). Open space and recreation uses are also identified for the site, including a multi-purpose grass field; however, unlike 2018 EIS Alternative 1, the proposed multi-purpose field for this alternative would not include any field lighting.

Police Services

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 no longer occur once full buildout of the site is completed. It is anticipated

⁶ Seattle Public Schools, 2024.

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 on the Fort Lawton site. It is also possible that police staffing and resources would be needed at times for traffic management during certain construction activities.

Operation

Increases in the on-site population associated with the development of affordable housing and senior/veteran supportive housing under Alternative 1 would be incremental over the buildout of the Fort Lawton site and would be accompanied by incremental increases in demand for police service. New open space and recreation uses would also be anticipated to generate some increased demand for police service, particularly active open space uses such as the multi-purpose field area. SPD would anticipate that call volumes could increase with development on the site; however, the exact number of incremental new calls cannot be quantified.

As described in the previous 2018 EIS document, 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.⁷ 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.⁸

Similar to the 2018 EIS Alternative 1, development of senior/veteran supportive housing under this alternative would include the provision of a comprehensive package of services focused on residential stability and the well-being of residents. Services would include onsite case managers providing services such as crisis intervention, prevention, and a range of other services. Another goal of these services is for residents to obtain and maintain financial and

⁷ Michael C. Lens. *Subsidized Housing and Crime: Theory, Mechanisms and Evidence*. January 2013.

⁸ Cheryl Young, *There Doesn't Go the Neighborhood: Low-Income Housing Has No Impact on Nearby Home Values*. November 2016.

medical benefits, decrease the use of emergency medical services, and establish a relationship with a primary health care provider. In addition, residents would have 24-hour access to residential counselors to engage in social activities and create opportunities for neighborhood volunteer activities (see **Chapter 2** for details). These support services would likely be anticipated to reduce the need for police services.

While new development and associated on-site population would result in an increase in police service calls, it is anticipated that SPD would have the capacity to continue to meet the police service needs on the site and in the remainder of the city of Seattle. While increases in staffing levels or equipment upgrades would not be anticipated to be directly needed as a result of the project, for the purposes of this analysis, a calculation of potential staffing needs is provided based on the current staffing levels of the department. Based on current (2023) staffing levels that are identified under the Affected Environment section (approximately 1.37 officers per 1,000 population), it is estimated that the up to approximately 1,600 new residents on the site under Alternative 1 could generate the need for approximately 2.2 new officers at full buildout.

Tax revenues generated from the development of the Fort Lawton site under Alternative 1 (Updated Proposed Action) 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 their strategic planning and budgeting process. As a result, significant impacts to police services are not anticipated.

Fire and Emergency Medical Services

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. 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. Existing SFD staffing and equipment are expected to be sufficient to handle any increased service needed for on-site construction activities. Potential construction-related increases in demand for fire and emergency medical services would be temporary in nature and would no longer occur once full buildout of the site is completed.

Operation

Increases in the on-site population under Alternative 1 (Updated Proposed Action) 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 open space and recreation uses (particularly active

recreation uses at the multi-purpose field) 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.

All new buildings would be constructed in compliance with the 2021 Seattle Fire Code, which is comprised of the 2021 International Fire Code with City of Seattle amendments. Adequate fire flow to serve the site would be provided as required by the 2021 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, it is anticipated that SFD 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. Although increases in staffing levels or equipment upgrades as a direct result of development under Alternative 1 would not be anticipated, for the purposes of this analysis, a calculation of potential staffing needs is provided based on the current staffing levels of the department. Based on current (2023) staffing levels that are identified under the Affected Environment section (approximately 1.28 uniformed personnel per 1,000 population), it is estimated that the up to approximately 1,600 new residents on the site under Alternative 1 could generate the need for approximately 2.0 new uniformed personnel at full buildout.

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

The 2018 EIS assumed that senior supportive housing units would not generate any students and for the purposes of this SEIS analysis, it is also assumed that these types of housing units would not generate students. Therefore, it is assumed that 400 residential units under Alternative 1 (Updated Proposed Action) could potentially generate students. This analysis also assumed that all residential units would be categorized as multi-family/townhomes in accordance with the categories utilized for SPS's student generation rates.

Operation

Based on the SPS student generation rates that are identified above in the Affected Environment discussion (0.791 students per income-restricted multifamily residence), it is anticipated that the development of 400 residential units on the Fort Lawton site would

generate up to approximately 316 new students. While it is not known which specific grade levels potential new students would attend, it would be assumed that students would be dispersed among many of the K-12 grade levels. Based on the projected enrollment levels for each of the schools serving the Fort Lawton site and their identified right-size capacities, it is anticipated that each of those schools would have available capacity to serve new students that could be generated by development under Alternative 1. SPS continually monitors projected enrollments and their relationships to building capacities. In the event that future school enrollments could potentially approach their capacities, there are several measures that SPS could implement such as the use of portable classroom buildings or enrollment boundary modifications which would be similar to those identified in the 2018 EIS (see Section 3.11.3 – Other Possible Measures for details).

Alternative 2 – No Action Alternative

Under Alternative 2, the Fort Lawton site would not be redeveloped at this time. The buildings on-site would remain in their existing vacant condition. The City of Seattle 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 public service impacts would be anticipated under Alternative 2.

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 Alternative 1. 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 new buildings would be constructed in compliance with the 2021 Seattle Fire Code, which is comprised of the 2021 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 2021 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.
- Public service providers (SPD, SFD, and SPS) would continue to identify and plan for their future needs as part of their regular strategic planning, capital facilities planning, and budgeting process.

Other Possible Measures

- Van service could be provided as part of the project for senior/veteran supportive housing and possibly for the other affordable housing onsite to enhance access to services and employment opportunities.
- All of the schools that currently serve the Fort Lawton site are projected to have available capacity to serve additional students in the future. However, in the event that future enrollments potentially approach school capacities, SPS could take any or a combination of the following actions:
 - Providing transportation service to schools with capacity;
 - Adding or relocation portables;
 - Adding, relocating or removing programs;
 - Adjusting school boundaries; and/or
 - Adding to or renovating buildings.

3.11.4 Significant Unavoidable Adverse Impacts

Development of the Updated Proposed Action and associated increases in on-site population would result in an increase in demand for public services. However, increased demand is anticipated to be modest in nature and service providers would be anticipated to have the capacity to serve the increases in demand. With the implementation of mitigation measures identified above, it is anticipated that significant unavoidable adverse public service-related impacts would not be expected.

3.12 UTILITIES

This section describes the utilities on and near the Fort Lawton site. Potential impacts from redevelopment of the SEIS alternatives are evaluated, and mitigation measures are identified. The section was prepared by MIG in December 2024.

Key Findings

Under existing conditions, there is no demand for potable water and sewage service at the Fort Lawton site. Potable water and sewage service is currently provided by Seattle Public Utilities (SPU); there are no known capacity constraints. Fort Lawton has an existing stormwater conveyance system. No water quality treatment facilities or flow control facilities are located at the site. Approximately 55% of the Fort Lawton site is currently impervious surface.

During construction under Alternative 1 (Updated Proposed Action), stormwater could be impacted by erosion, sedimentation or pollutants. A temporary stormwater control system and Best Management Practices (BMPs) would be required to minimize potential impacts.

With development on the Fort Lawton site, Alternative 1 would reduce the existing approximately 13.81 acre impervious surface coverage by approximately 2.32 acres.

Operations under Alternative 1 would increase sewage flows to 87,500 gallons per day (gpd). Increases in potable water demand would be approximately equivalent to the increases in sewage flow and could increase depending on irrigation needs for the open space.

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);

Stormwater regulation is per the Seattle Stormwater Code (SMC 22.800) and the associated guidance in the *2021 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 sanitary 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 site, 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 from the 1920s up until the late 1990s.

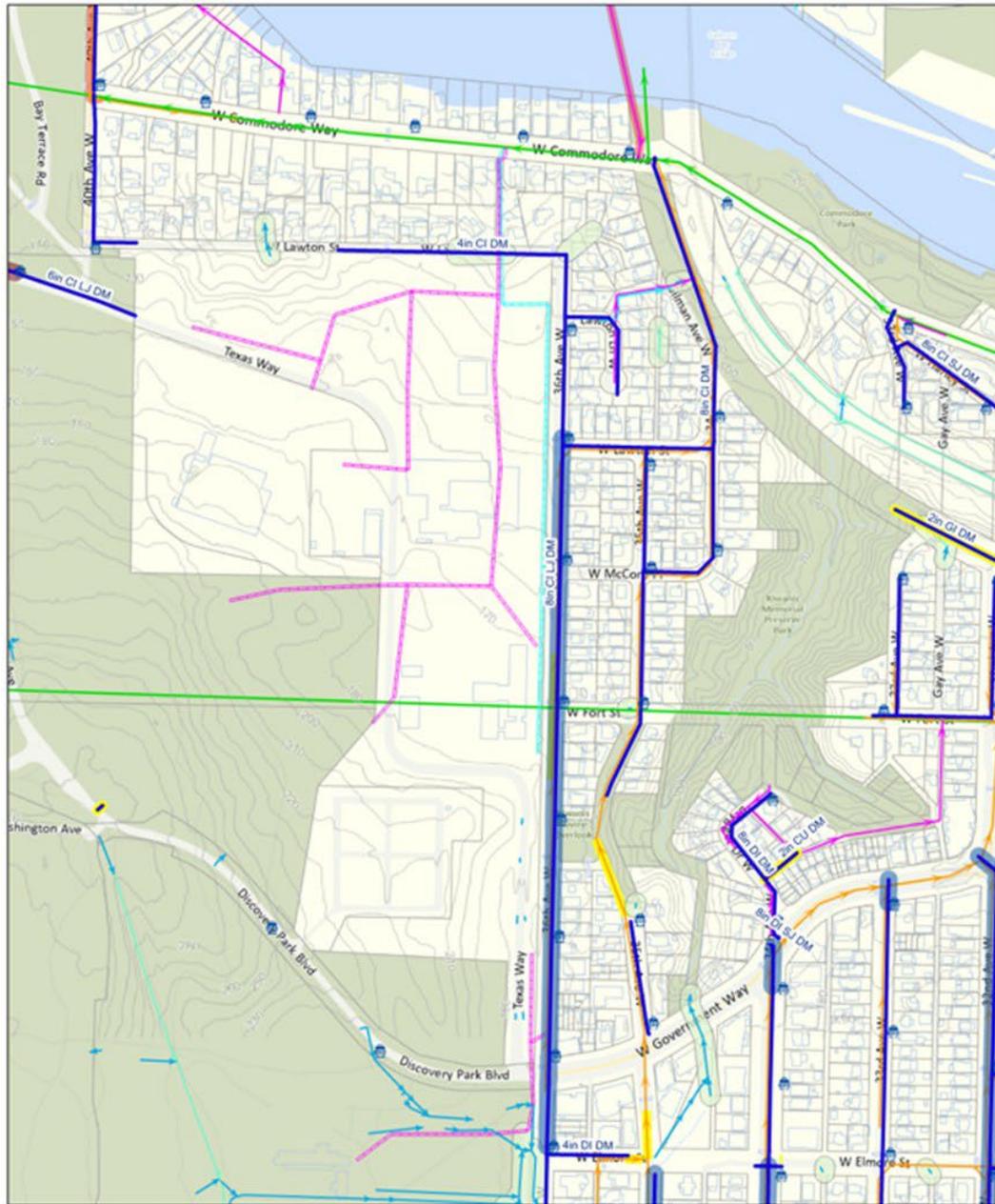
Stormwater

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 stormwater lines 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.

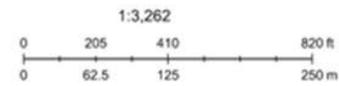
Previous flooding has been reported at a residence downstream of the site. This flooding has been addressed.

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- | | | |
|-----------------------|---------------------------|-----------------------------|
| Hydrant Location | Culvert | Private Sanitary Main |
| Water Mains | Mainlines (Permitted Use) | Force Mainlines |
| No New Taps | SPU Drainage Main | Peak Control Infrastructure |
| Unlined | SPU Sanitary Main | Repairs and Linings |
| Lining Status Unknown | SPU Combined Main | |
| Ditches and Culverts | King County Sewer Main | |
| Ditch | Private Drainage Main | |



City of Seattle

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Note: This figure is not to scale



North

Source: MIG, 2024.



Figure 3.12-1
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

An 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 1,630 miles of water mains, six covered reservoirs, two out of service open reservoirs, sixteen pump stations, six elevated tanks and standpipes, 17,000 valves, 19,000 fire hydrants and more than 191,000 service lines to serve 1.4 million regional customers.¹ The SPU *2019 Water System Plan* was prepared to identify 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 a pump house owned by Seattle Public Utilities is located in the southeast corner of the POV parking area, just north of Harvey Hall. The pump house contains booster pumps for the municipal fire hydrant system.. 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 *2019 Water System Plan*.

3.12.2 Impacts of the Alternatives

An analysis of the potential utility impacts under the SEIS Alternatives is provided below .

Alternative 1 - Mixed Income Affordable Housing and Public Park Uses Onsite (Updated Proposed Action)

Under Alternative 1, development would feature a mix of affordable housing and public park uses on the 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 required to be implemented to 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 33% of the site would be covered in impervious surfaces at project buildout, roughly 7% 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 storm drainage conveyance system 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 public sewer system to approximately 87,500 gpd². Under Alternative 1, the existing 8-inch sewer line

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 (500 units x 2.5 person/unit), **Housing and Socioeconomics**.

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.

Stormwater discharges into the existing combined sewer system will be reduced by both total volume (due to Green Storm Water approaches that encourage infiltration) and by peak flow (due to detention/retention facilities).

Approaches to separate storm water discharges from sanitary will require water quality treatment for storm water runoff from pollution generating impervious surfaces (e.g. vehicular streets and parking lots).

Water

SPU would continue to provide water services 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 87,500 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 may 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 the 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.

Alternative 2 – No Action Alternative

Under the No Action Alternative, no redevelopment on the Fort Lawton site would occur at this time. The Fort Lawton site would remain in its existing vacant use. There would be no additional demand for stormwater, sewer or water services and there would be no impacts on these utilities.

3.12.3 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 SEIS Alternatives. 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 and flow control, 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 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).

3.12.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse utility impacts are expected.

3.13 HOUSING AND SOCIOECONOMICS

This section of the Draft SEIS describes the housing and socioeconomic conditions on and near the Fort Lawton site. Potential impacts from redevelopment of the SEIS 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 Fort Lawton site vicinity is less economically diverse and contains fewer minorities compared to the overall percentages in the city of Seattle. For Census Tract 57 in the Fort Lawton vicinity the median household income is above the Seattle median household income.

At the Fort Lawton site, Alternative 1 (Updated Proposed Action) would increase residential density; adding 500 affordable housing units, including units for people who formerly experienced homelessness; increase the population to approximately 1,600 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.

Methodology

Information and analysis in this section is largely based on U.S. Census data (2022, American Community Survey, 5-year estimates), real estate data and studies and review of the *Draft One Seattle 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).

3.13.1 Affected Environment

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 2022 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 2020 decennial census or the more recent 2023 ACS 1-year estimates.

Housing

The Fort Lawton site does not currently contain any housing units. **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 largest category of the housing supply in the vicinity is single-family, detached housing (43 percent). Comparatively, 39.5 percent of housing units in the city of Seattle are detached single-family. Housing in the Fort Lawton vicinity is 49% owner occupied, and 50% renter occupied. The 49% rate for owner-occupied units is slightly higher than the City of Seattle’s rate of 48.5%.

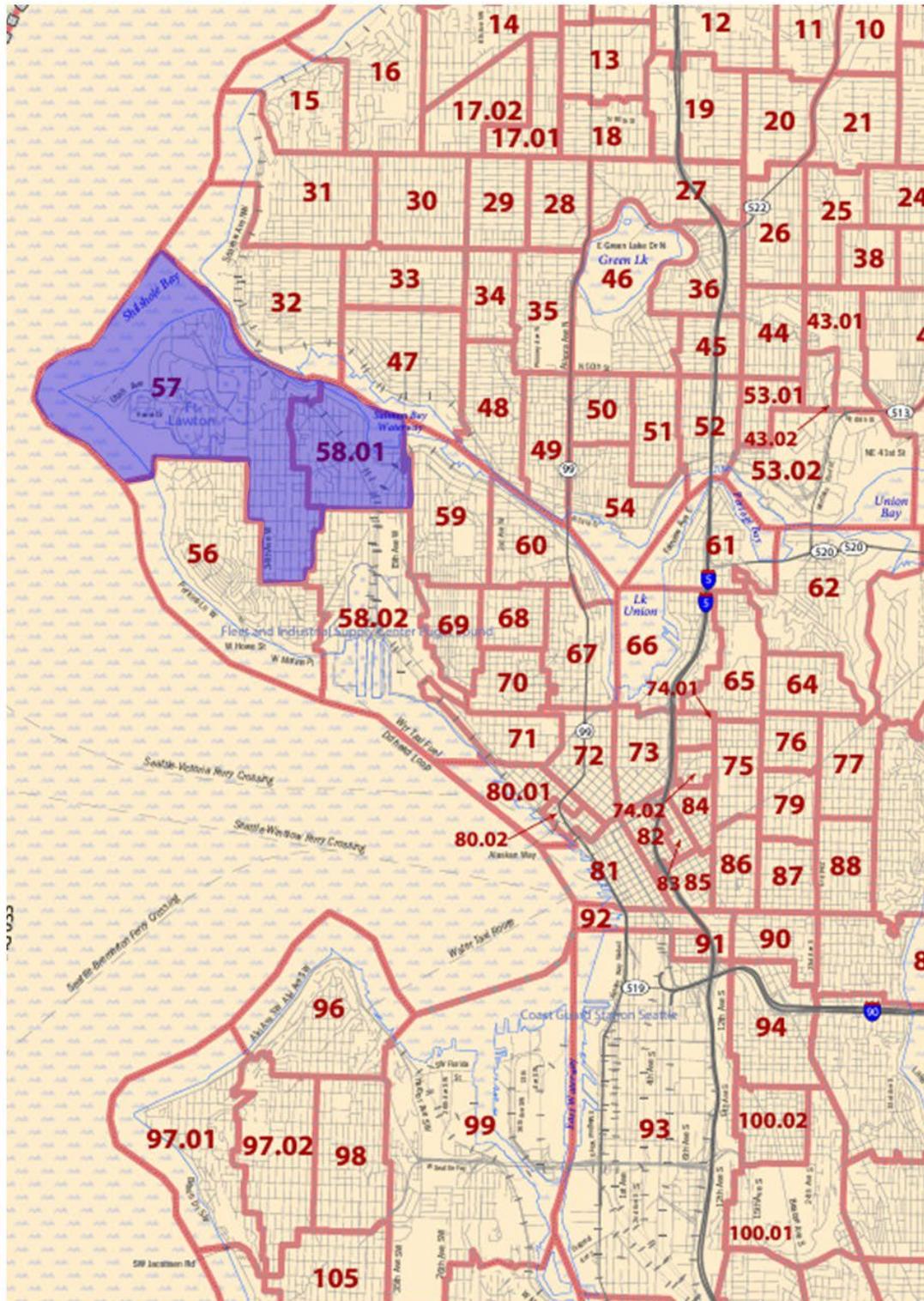
**Table 3.13-1
HOUSING CHARACTERISTICS – FORT LAWTON VICINITY**

	SITE VICINITY ¹	CITY OF SEATTLE
Total Housing Units	6,656	372,436
Occupied Units	6,140 (92.2%)	345,246 (92.7%)
Vacant Units	516 (7.7%)	27,190 (7.3%)
Owner Occupied	3,023 (49%)	153,477 (48.5%)
Renter Occupied	3,117 (50%)	191,769 (60.6%)
Housing Units Per Structure		
• 1, detached	2,656 (43%)	137,879 (39.9%)
• 1, attached	500 (8%)	19,866 (5.8%)
• 2	98 (1.5%)	6,767 (2.0%)
• 3 – 4	207 (3%)	11,583 (3.4%)
• 5 – 9	626 (10.1%)	18,337 (5.3%)
• 10 or more	2,035 (33%)	149,886 (43.4%)
• Mobile home, Boat, Van	18 (0.2%)	928 (0.3%)

Source: Census Bureau, 2022, American Community Survey, 5-year estimates.

¹The Fort Lawton vicinity is comprised of Census Tracts 57 and 58.01 – there are no housing units on the Fort Lawton site.

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Note: This figure is not to scale

Fort Lawton Site Vicinity Census Tracts



Source: City of Seattle, 2010.



Figure 3.13-1
Census Tracts Map

Rent/Income-Restricted Housing in Seattle

The *One Seattle Plan* defines rent/income-restricted housing as “housing with a regulatory agreement, covenant, or other legal document on the property title that sets a limit on the income of households that may rent or purchase the unit(s) and controls the rent or sales price.”¹ As of 2023, Seattle had approximately 28,600 income-restricted affordable rental 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 50% of the U.S. Department of Housing and Urban Development (HUD) area median income (AMI) for the Seattle-Bellevue HUD Metro Fair Market Rent (FMR) Area, which in 2024 is \$52,700 for an individual and \$75,350 for a family of four.

The Seattle Housing Authority owns and manages over 8,600 housing units and administers over 8,600 Housing Choice Vouchers, collectively serving over 37,000 individuals.² The City of Seattle Office of Housing manages funds and investments to fund the preservation and production of affordable housing. Over half of the income-restricted affordable rental units throughout Seattle have been created or preserved with support by the City; in 2022, eight families used DPA assistance to purchase their first home; and emergency rental assistance has been provided to over 10,000 households by the end of 2022.

City Housing Plans

The *Draft One Seattle Plan* anticipates that by 2044 Seattle will add a minimum of 112,000 housing units (and 159,000 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.³ 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 *One Seattle Plan* as an urban neighborhood appropriate for primarily residential uses.⁴

In Seattle, there are an estimated 34 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 66 per 100 renter households in that income band. The gap of available and affordable rental units is

¹ Draft One Seattle Plan, Housing, 2024, p. 186.

² Seattle Housing Authority, *2023 Annual Report*.

³ Draft One Seattle Plan, Growth Strategy, 2024, p. 16.

⁴ Draft One Seattle Plan. Growth Strategy, Figure 8 Urban Neighborhood Map, 2024, p. 27.

49 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).⁵ 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.⁶ Overall, about 37 percent of Seattle households of color are burdened by unaffordable housing costs compared with 30 percent of white, non-Hispanic households.⁷ 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 112,000 housing units being planned for by the City, the One Seattle Plan estimates at least 43,500 rent/income-restricted units would be needed for households with incomes of 0-30 percent of AMI. Growth projections from the King County Countywide Planning Policies (Amended August 2023) estimates Seattle's minimum housing need at 112,000 total new units by 2044, with the greatest need in the lowest income category, 43,600 new units for those making 30 percent and below 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: 19,000 rent/income-restricted housing units (with need met entirely by rent/income-restricted housing).⁸ For households with incomes 50-80 percent of AMI: 7,900 rent/income-restricted housing units (with need met entirely by rent/income-restricted housing) Overall, addressing the affordability needs of 112,000 new households would require production of roughly 76,000 housing units affordable at or below 80 percent of AMI. This is in addition to affordable housing to address unmet need.⁹

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 40.6% minority, while approximately 28.4% of residents in the Fort Lawton site vicinity are minorities. Asians/Asian Americans, Hispanics and Africans/African Americans represent the largest minority populations in the vicinity.

⁵ Draft One Seattle Plan Housing Appendix, November 2024, p. 105.

⁶ Draft One Seattle Plan Housing Appendix, November 2024, p. 34.

⁷ Draft One Seattle Plan Housing Appendix, November 2024, p. 42.

⁸ Draft One Seattle Plan Housing Appendix, November 2024, p. 17.

⁹ Draft One Seattle Plan Housing Appendix, November 2024, p. 17.

**Table 3.13-2
RACE AND ETHNICITY – FORT LAWTON VICINITY**

	RACE								
	Total Pop.	ONE RACE						Two or More Races	Hispanic or Latino
White		Black or African American	American Indian & Alaska Native	Asian	Native Hawaiian & Pacific Islander	Other Race			
FL Vicinity¹	12,702	9,093	247	43	1,320	40	85	958	916
		71.6%	1.9%	0.33%	10.4%	0.31%	0.67%	7.5%	7.2%
City of Seattle	737,015	438,168	50,234	3,268	124,696	1,941	4,473	53,672	60,563
		59.4%	6.8%	0.4%	16.9%	0.3%	0.6%	7.2%	8.2%

Source: 2022 American Community Survey.

¹ Census Tracts 57 and 58.01.

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 2.7 percent higher and the share of the population that is female is 0.1 percent lower, compared to those shares for the city of Seattle. In the Fort Lawton site vicinity, the share of population that is foreign-born is 4.4 percent lower and the share of the population that speaks English less than “very well” is 4.6 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	12,702	737,015
• Male	• 6,442 (51.2%)	• 376,614 (51.1%)
• Female	• 6,143 (48.8%)	• 360,400 (49.8%)
% Population Under Age 18	16.7%	14%
Population Age 65 and Older	11.9%	12.8%
Population with a Disability	882 (6.9%)	71,567 (9.8%)
Foreign-Born Population	1,955 (15.4%)	145,748 (19.8%)
Speak English Less Than ‘Very Well’	337 (2.6%)	53,065 (7.2%)

Source: 2022 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:¹⁰

- 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 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 site vicinity and city of Seattle only, **Table 3.13-4** shows the median household income as reported to the U.S. Census Bureau.¹¹ 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 2022 American Community Survey is \$177,654 in Census Tract 57 and is \$129,898 in Census Tract 58.01, compared to \$116,068 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	6,483	6,104	737,015
Total Number of Households	2,973	3,167	345,246
Median Household Income	\$177,654	\$129,898	\$116,068

Source: 2022 American Community Survey 5-Year Estimates.

Employment

¹⁰ 42 U.S.C. 1437a(b)(2).

¹¹ 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.

Presently, there are no active uses on the Fort Lawton site and no economic activity is directly associated with the site.

With 2022 unemployment rates of 2.8% and 1.4% in Census Tracts 57 and 58.01 respectively, the vicinity contains lower ratios of unemployed people than the city of Seattle overall, at approximately 4.2%. 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.

**Table 3.13-5
EMPLOYMENT – FORT LAWTON VICINITY**

	FORT LAWTON VICINITY		CITY OF SEATTLE
	CT 57	CT 58.01	
Population 16 years and older	5,113	5,476	641,230
People in Civilian Labor Force	3,709 (72.5%)	4,645 (84.8%)	472,657 (73.7%)
Unemployment Rate	181 (2.8%)	85 (1.4%)	30,954 (4.2%)

Source: 2022 American Community Survey 5-Year Estimates.

City of Seattle Growth Plans – Employment

The *Draft One Seattle Plan* estimates adding 159,000 net new jobs by 2044. As with housing, the Draft 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 urban neighborhood designated primarily for residential uses.¹²

3.13.2 Impacts

An analysis of the potential housing and socioeconomic impacts of Alternative 1, Updated Proposed Action, and Alternative 2, No Action, is provided below.

Alternative 1– Mixed Income Affordable Housing and Public Park Uses Onsite (Updated Proposed Action)

The Updated Proposed Action would include up to 500 residential units with residential support services, as well as public park uses, on the Fort Lawton site.

¹² Draft One Seattle Plan. Growth Strategy, Figure 8 Urban Neighborhood Map, 2024, p. 27. Note that at the time of Draft SEIS publication, the One Seattle Plan is a draft with City Council vote on approval anticipated for Summer 2025.

Construction Impacts

Future redevelopment assumed under Alternative 1 (Updated Proposed Action) 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 2032, 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 (Updated Proposed Action), the total number of residential units onsite would increase from 0 to 500. Density would increase from 0 dwelling units/acre to approximately 15 dwelling units/acre over the entire 34-acre site; compared to 238 dwelling units with approximately 7 dwelling units per acre under the 2018 EIS. **Table 13-6** summarizes the housing units assumed under Updated Proposed Action along with a comparison to the housing units under 2018 EIS Alternative 1. Approximately 60 percent of the housing units would be rental housing and the remaining 40 percent of the units would be for ownership.

**Table 13-6
NUMBER/TYPE OF HOUSING UNITS COMPARISON**

	2018 – Preferred Alt. (Alt. 1)	Update Proposed Action (SEIS Alternative 1)
Senior/Veteran Housing (at/below 30% AMI)	85	100
Affordable Ownership (at/below 80% AMI)	52	200
Affordable Rental (at/below 60% AMI)	100	200
Total	237	500

The affordable housing developed onsite would support households with a range of income levels, as detailed below.

- **Senior/Veteran Supportive Rental Housing** for senior citizens and veterans (55 years of age and older) who were formerly homeless and have incomes at or below 30% of the area median income (AMI);¹³
- **Affordable Rental** for households with incomes at or below 60% of the AMI; and,

¹³ Per the U.S. Department of Housing and Urban Development, the FY 2024 AMI for a family of four in the Seattle-Bellevue HUD Metro Fair Market Rent Area (HMFA) is \$147,400.

- **Affordable Homeownership** for sale to households with incomes at or below 80% of the AMI.

Table 3.13-7 summarizes the estimated population that could result with each type of housing under the Updated Proposed Action compared with the population assumed under Alternative 1 of the 2018 EIS. For purposes of this analysis, population estimates were generated for each housing type (persons per household): formerly homeless seniors, affordable rentals, and affordable homeownership.¹⁴

**Table 13-7
POPULATION ESTIMATE COMPARISON**

	2018 – Preferred Alt. (Alt. 1)	Update Proposed Action (SEIS Alternative 1)
Senior/Veteran Housing (at/below 30% AMI)	86	100
Affordable Ownership (at/below 80% AMI)	250	1,000
Affordable Rental (at/below 60% AMI)	260	500
Total	596	1,600

Source: Seattle Office of Housing, 2025.

City Housing Needs

The housing provided onsite under the Updated Proposed Action would contribute towards the minimum of 112,000 housing units anticipated to account for Seattle’s share of King County’s growth by 2044.¹⁵ 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.¹⁶ The Updated Proposed Action would contribute towards the City’s target at or below 80% of AMI to meet the needs associated with growth by 2044.

As noted previously, the Updated Proposed Action would add 500 low-income housing units for households with a range of low-income levels at a site that currently contains no housing. Of the total, up to 100 would be units for extremely low-income seniors and veterans (supportive housing for formerly homeless seniors and veterans 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 200 rental units for low-income households (at or below 60% of AMI) would address Seattle’s need associated with projected growth through 2044 for a minimum of 9,500 units affordable and available to households with incomes no higher than 80% of AMI. Overall, the addition of 500

¹⁴ Population estimates for rent-restricted affordable housing are based on comparable projects and are calculated as follow:

- Senior Supportive housing – 100 residents (100 units x 1.0 resident per unit);
- Affordable rental – 500 residents (200 units x 2.5 residents per unit); and
- Affordable ownership – 1,000 residents (200 units x 5.0 residents per unit).

¹⁵ Draft One Seattle Plan, Housing, 2024, p. 186.

¹⁶ Draft One Seattle Plan, Housing, 2024, p. 95

affordable housing units would represent an approximately 0.7% increase to Seattle’s supply of approximately 70,726 income-restricted affordable housing units.

The Magnolia neighborhood is generally a high-cost neighborhood, particularly with regard to for-sale housing. The average home value in Magnolia is \$1,227,409 as of November 2024. This is an increase of 4% over the last year according to the Zillow Home Values Index, compared to an average home value of \$850,864 across the city of Seattle which has only increased by 3.4% in the past year. The median rental price in Magnolia is \$2,789, significantly higher than the median rental price across Seattle, which is \$2,045 as of December 2024 according to Redfin. Apartment rent across Washington state increased 1.6%, with a slightly greater increase in the Puget Sound region at 1.7% in the second quarter of 2024.¹⁷ 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.¹⁸ 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.¹⁹

Relationship to Housing in Vicinity

The additional 500 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 6,656 housing units in the vicinity currently (census tracts 57 and 58.01), and this would increase by 7.5% to 7,156 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 43% single-family detached in the Fort Lawton vicinity).

The Updated Proposed Action (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.

¹⁷ Washington State Apartment Market Report 2nd Quarter 2024. Washington Center for Real Estate Research, 2024. <https://wcrer.be.uw.edu/wp-content/uploads/sites/60/2024/08/Washington-Apartment-Market-Report-Q2-2024.pdf>

¹⁸ Draft One Seattle Plan, Housing, 2024, p. 95.

¹⁹ Seattle Civil Rights and Labor History Project, Racial Restrictive Covenants, <http://depts.washington.edu/civilr/covenants.htm>

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.²⁰

Socioeconomics

Under the Updated Proposed Action (Alternative 1), the permanent on-site residential population would increase from 0 to approximately 1,600 residents (see **Table 3.13-7**). 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 11.9 percent in the vicinity) could slightly increase with the addition of up to approximately 100 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 28.4 percent minority, compared to a 40.6 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 (estimated \$177,654 in Census Tract 57 and \$129,898 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 overall 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/veteran 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 (Updated Proposed Action) 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 on goods and services within the area near the site. Nearby neighborhood

²⁰ Young, Cheryl. *There Doesn't Go the Neighborhood, Low-Income Housing Has No Impact on Nearby Home Values*. Trulia's Blog. November 2016.

commercial businesses could benefit from spending associated with residential development on the site.

Alternative 2 – 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 zoning.

3.13.3 Mitigation Measures

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

3.13.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse housing or socioeconomic impacts are expected.

3.14 ENVIRONMENTAL JUSTICE

This section of the Draft SEIS describes the environmental justice-related conditions on and near the Fort Lawton site. 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 site 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 the site, including PCBs, asbestos and lead-based paint in older existing buildings.

Construction under Alternative 1 (Updated Proposed Action) would eliminate or stabilize health hazards associated with the older buildings at the Fort Lawton site. 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, Alternative 1 (Updated Proposed Action) would include affordable housing, community facilities and/or parks/recreation uses on the Fort Lawton site. No significant environmental justice-related impacts are expected from operation of these uses. The affordable housing provided under Alternative 1 at the 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 (2022, 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 site, including the potential presence and composition of minority and low-income populations and health and safety risks.

The Fort Lawton site is located in Seattle’s Magnolia neighborhood. Land uses in the Fort Lawton site 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 retained by the U.S. Army and used as a Reserve Center. About 34 acres of the Reserve Center, and the subject of this SEIS, 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

¹ EPA. <https://www.epa.gov/environmentaljustice/learn-about-environmental-justice>. Accessed June 2017.

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 40.5% minority, while approximately 28.4% 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 (\$177,654 in Census Tract 57 and \$129,898 in Census Tract 58.01) compared to the city of Seattle's median household income of \$70,594 (2022 ACS Survey). The Fort Lawton site 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 32.3% versus the Seattle Public School District average of 54.7% and the state average of 51.6%). Approximately 9.2% of the students attending Lawton Elementary are characterized as low-income and participate in free or reduced-price lunch programs compared to 34.3% of students citywide.

**Table 3.14-1
ELEMENTARY SCHOOL CHARACTERISTICS**

Parameter	Lawton Elementary School	Seattle Public Schools (K-5)	State Average
White	67.7%	45.3%	48.4%
African American	0.9%	14.1%	4.7%
Asian or Asian/Pacific Islander	7.4%	12.4%	8.9%
Two or more races	16%	12.6%	9.1%
Hispanic	7.7%	14.6%	26.2%
American Indian/Alaska Native	>1%	0.4%	1.2%
Hawaiian Native/Pacific Islander	>1%	0.5%	1.4%
Students Participating in Free or Reduced-Price Lunch Program / Students from Low-income Families	9.2%	34.3%	50.1%

Source -2023-24 school year data: <https://reportcard.ospi.k12.wa.us/ReportCard/ViewSchoolOrDistrict/100229>

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 SEIS 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.

3.14.2 Impacts

An analysis of the potential environmental justice impacts of Alternative 1 (Proposed Action Update) is provided below.

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’.²

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 October 1, 2024, the City issued a Determination of Significance (DS) and Request for Comments on the Scope of the SEIS. The DS indicated that the 21-day EIS scoping period would end on October 23, 2024, 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 SEIS. The SEIS Public Scoping meeting was held on October 10, 2024. During this meeting, the public was encouraged to provide both written and/or oral comments on the scope of the EIS. Approximately 65 people attended the 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 a continuous opportunity to provide written or oral comment throughout the meeting.

The opportunity for further public engagement is provided during the 30-day comment period which ends May 30th, following issuance of this Draft SEIS on April 22nd. An in-person public meeting is scheduled during this comment period on **Wednesday, May 21st, 2025 at 6 PM** (see the **Fact Sheet** for details). Meeting attendees will be able to provide oral or written comments on the Draft SEIS at the meeting. The public is also invited to submit written or email comments during the Draft SEIS comment period. Responses to the Draft SEIS comments will be provided in the Final SEIS.

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses Onsite (Updated Proposed Action)

Under Alternative 1 (Updated Proposed Action), assumed development would feature a mix of affordable housing on the Fort Lawton site, including affordable rental and ownership and formerly homeless housing. Up to 500 housing units would be provided on the site. Public park

² EPA. Environmental Justice. <http://www.epa.gov/environmentaljustice/basics/index.html> .

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.

Construction

During construction for Alternative 1 (Updated Proposed Action), 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 (Updated Proposed Action) 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 (Updated Proposed Action) 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).

Site Vicinity

As noted previously, very few low-income or minority populations are located in the Fort Lawton site 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 (Updated Proposed Action) 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.³ 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.

Alternative 2 - 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 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.

3.14.3 Mitigation Measures

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

³ Draft One Seattle Plan, Housing, 2024, p. 95.

- 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

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
ASTs	Aboveground Storage Tanks
BGS	Beneath Ground Surface
BLS	Basic Life Support
BMPs	Best Management Practices
BRAC	Base Realignment and Closure
CAD	Computer-Aided Dispatch
CCA	Washington State Climate Commitment Act
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Equivalent Amount of Carbon Dioxide
CPP	King County Countywide Planning Policies
CSECP	Construction Stormwater Erosion Control Plan
CWA	Clean Water Act
CZMP	Coastal Zone Management Program
DAHP	Washington State Department of Archaeology and Historic Preservation
DS	Determination of Significance
DSEIS	Draft Supplemental Environmental Impact Statement
EA	Environmental Assessment
ECAs	Environmentally Critical Areas
EFSEC	Energy Facility Site Evaluation Council
EMS	Emergency Medical Services
EPA	Environmental Protection Agency
ESA	Endangered Species Act
ESDS	Evergreen Sustainable Development Standards
FLARC	Fort Lawton Army Reserve Complex
FONSI	Finding of No Significant Impact
FWHCAs	Fish and Wildlife Habitat Conservation Areas
GHGs	Greenhouse Gases
GMA	Growth Management Act
HUD	US Department of Housing and Urban Development
LBP	Lead-Based Paint
LMI	Low- and Moderate-Income

LR2-M1	Lowrise Multifamily Zone
LRA	Local Redevelopment Authority
MBTA	Migratory Bird Treaty Act
MCPP	Micro Community Policing Plans
MRS	Munitions Response Site
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
NO ₂	Nitrogen Dioxide
NOAA	National Oceanographic and Atmospheric Administration
NOx	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NR2	Neighborhood Residential Zone
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
NWIFC	Northwest Indian Fisheries Commission
O ₃	Ozone
ORMA	Ocean Resources Management Act
PCBs	Polychlorinated Biphenyls
PM	Particulate Matter
PSCAA	Puget Sound Clean Air Agency
RCW	Revised Code of Washington
SDCI	Seattle Department of Construction and Inspections
SDOT	Seattle Department of Transportation
SEIS	Supplemental Environmental Impact Statement
SEPA	State Environmental Policy Act
SF 7200	Single Family 7200
SFD	Seattle Fire Department
SLR	Seattle Landmarks Register
SMA	Shoreline Management Act
SMC	Seattle Municipal Code
SOx	Sulfur Oxides
SP	Spill Plan
SPD	Seattle Police Department
SPR	Seattle Department of Parks and Recreation
SPS	Seattle Public Schools
SPU	Seattle Public Utilities
SWIFD	Statewide Washington Integrated Fish Distribution
TSCA	Toxic Substances Control Act
USFWS	United States Fish and Wildlife Service
USTs	Underground Storage Tanks
VA	Veterans Administration
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WA DNR	Washington State Department of Natural Resources
WAAQS	Washington State Ambient Air Quality Standards
WAC	Washington Administrative Code

WDFW Washington Department of Fish and Wildlife
WHR Washington Heritage Register
WTD King County Wastewater Treatment Division

CHAPTER 5

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