



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

**SEPA Threshold Determination**

**Public Schools Code Updates**

**Project Sponsor:** City of Seattle Department of Construction and Inspections

**Location of Proposal:** The proposal is a non-project action, applicable City-wide

**SUMMARY OF PROPOSED ACTION**

The proposal is to amend the City's land use regulations to updates to the Land Use Code for new public school construction projects.

The following approval is required:

**I. SEPA Environmental Determination (Seattle Municipal Code (SMC) Chapter 25.05)**

**SEPA DETERMINATION**

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

**BACKGROUND**

Adoption of the proposed legislation is a non-project action that updates the Land Use Code for new public school construction projects. The amendments are intended to help support current educational needs such as flexible classroom design, outdoor play areas, parking, and school bus loading. Changes are also proposed for the public school departure process, which uses an advisory committee to consider flexibility in how standards are applied to school construction. These changes include updates to the composition and service requirements of the committee.

**PUBLIC COMMENT**

Proposed changes to the Land Use Code require City Council approval. Public comment will be taken on the proposal during Council meetings and a City Council public hearing.

## PROPOSAL DESCRIPTION

The proposal includes four code amendments to the Land Use Code by code section as follows:

1. Building height and bus loading in residential zones (SMC 23.51B.002).
  - Changes to the allowed structure height to 45 feet with an additional allowance of 15 feet for screened or enclosed rooftop mechanical equipment applicable to the NR zones. This would apply a height allowance that better accommodates multi-floor schools and allows equipment on rooftops to be screened from view and protected from the weather. Multi-floored schools can allow for more efficient use of land for outdoor play space and full-service schools to meet student and neighborhood needs.
  - Updates the bus loading requirement to allow existing on-street (curbside) bus loading space to remain and would only require departures when curbside loading is expanded (i.e., additional buses or location enlarged).
2. Required parking (SMC 23.54.015)
  - Changes the parking requirement to one parking space for every two classrooms. This would apply a requirement that addresses the number of staff and visitors generally on-site during school sessions.
3. Signs in residential zones (SMC 23.55.020 and 23.55.022)
  - Updates the sign standards to allow electric/reader board signs. These types of signs convey important school information and can accommodate translations into multiple languages.
  - The update would allow one electric reader board sign outright, and would add new standards for frequency of movement, color, and operating standards. Current limits on size (height/width/sign area) would be maintained.
4. Update the process that allows consideration of departures from development standards (SMC 23.79.004)
  - Updates the composition and service requirements of the advisory committee by modifying the composition of the advisory committee to allow a wider range of expertise; allow more continuity of members and afford more experience/training for committee members.

### **I. ANALYSIS – SEPA**

Environmental review resulting in a Threshold Determination is required pursuant to the State Environmental Policy Act (RCW 43.21C), Washington Administrative Code (WAC) 197-11, and the Seattle SEPA Ordinance (Seattle Municipal Code (SMC) Chapter 25.05).

This proposal is for an adoption of legislation and is defined as a non-project action. The disclosure of the potential impacts from this proposal was made in an environmental checklist submitted by the proponent. The information in the checklist, a copy of the proposed code changes, the Director's Report and Recommendation, and the experience of the lead agency with review of similar legislative actions form the basis for this analysis and decision.

## **ELEMENTS OF THE ENVIRONMENT**

### **LONG TERM IMPACTS**

#### **Height, Bulk, and Scale**

Section 25.05.675.G (Height, Bulk, and Scale Policy) outlines the environmental policies related to height, bulk, and scale. Current height regulations for public schools vary depending on the specific use and zone, generally allowing up to 35 feet, with an additional 15 feet permitted for rooftop mechanical equipment. The proposed revision simplifies these standards to a 45-foot height allowance, with an additional 15 feet for rooftop mechanical equipment. In recent years, SDCI has allowed height departures ranging from 43 to 60 feet without adverse effects on surrounding properties.

As stated in the Overview policies in SMC 25.05.665.D, the existing City Codes and regulations addressing height, bulk, and scale impacts are considered sufficient. Therefore, additional mitigation is not required under SMC 25.05.675.G (Height, Bulk and Scale Policy).

#### **Light and Glare**

SMC 25.05.675.K (Light and Glare Policy) aims to minimize or prevent hazards and other negative impacts caused by light and glare. The proposed code amendment permits one electric or reader board sign per school, which may generate higher light impacts. The draft language maintains and strengthens restrictions on sign-related light and glare to protect surrounding properties and minimize driving disruptions.

According to the Overview policies in SMC 25.05.665.D, the proposed City Codes and regulations are deemed sufficient to mitigate light and glare impacts. Therefore, additional mitigation is not required under SMC 25.05.675.K (Light and Glare Policy).

#### **Traffic and Transportation**

The proposed revisions to parking and bus loading standards aim to align the code with current practices. Regarding bus loading, the revised language allows for curbside loading and unloading, which has historically been permitted for school projects.

The project is expected to have minimal impact on the service levels around school sites and the overall transportation system, consistent with recent school projects. No additional mitigation is necessary per SMC 25.05.675.R (Traffic and Transportation Policy).

#### **Historic Preservation – Architectural Resources**

Many of the school sites across Seattle have landmark protections. The Department of Neighborhoods will still review site-specific redevelopment proposals for compliance with the Landmarks Preservation requirements of SMC 25.12 as applicable. Per the Overview policies in SMC 25.05.665.D, the existing City Codes and regulations to mitigate impacts to historic resources are presumed to be sufficient, and no further conditioning is warranted per SMC 25.05.675.H (Historic Preservation Policy).

## RELATIONSHIP TO PLANS AND POLICIES

The non-project action accommodates the educational needs of public schools bring current standards up to date. These are objectives predominantly aligning with Comprehensive Plan goals and principles, such as:

GOAL CF G5	<i>“Make efficient use of resources when investing in facilities and service delivery that involve other agencies and organizations.”</i>
POLICY CF 5.3	<i>“Partner with Seattle Public Schools to plan for expected growth in student population, explore opportunities to reduce the costs of developing new schools, encourage the siting of new school facilities in or near urban centers and villages, and make it easy for students and families to walk and bike to school.”</i>
POLICY LU 3.2	<i>“Allow public facilities and small institutions to depart from development standards, if necessary to meet their particular functional requirements, while maintaining general design compatibility with the surrounding area’s scale and character. Require public facilities and small institutions to adhere to zoned height limits, except for spires on religious institutions. Consider providing greater flexibility for schools in recognition of their important role in the community.”</i>
POLICY LU 3.3	<i>“Allow standards to be modified for required off-street parking associated with public facilities and small institutions based on the expected use and characteristics of the facility and the likely impacts on surrounding parking and development conditions, and on existing and planned transportation facilities in the area.”</i>
GOAL LU G6	<i>“Regulate off-street parking to address parking demand in ways that reduce reliance on automobiles, improve public health and safety, reduce greenhouse gas emissions, lower construction costs to reduce the cost of housing and increase affordable housing, create attractive and walkable environments, and promote economic development throughout the city.”</i>
POLICY LU 6.1	<i>“Establish parking requirements where appropriate for both single-occupant vehicles and their alternatives at levels that further this Plan’s goal to increase the use of public transit, car pools, walking, and bicycles as alternatives to the use of single-occupant vehicles.”</i>
POLICY LU 6.3	<i>“Rely on market forces to determine the amount of parking provided in areas of the city that are well-served by transit, such as urban centers and urban villages.”</i>
POLICY LU 6.4	<i>“Consider setting maximums in urban centers and urban villages, where high levels of pedestrian, bicycle, and transit accessibility make many trips possible without a car.”</i>
POLICY LU 6.9	<i>“Require parking in areas with limited transit access and set the requirements to discourage underused parking facilities, even if occasional spillover parking could result.”</i>

## CONCLUSION

The proposed changes fall within the scope and intent of adopted policy goals for the City of Seattle. The general effect of the changes would be to support school programming in modern public school buildings, meet current educational needs for new public school construction proposals (inclusive of major additions or remodels) and improve the public school departure process all consistent with the Comprehensive Plan. It is anticipated that future development using these provisions will be subject to

SEPA, as required, to address potential adverse impacts. Therefore, no mitigation pursuant to SEPA policies is warranted.

**DECISION – SEPA**

This decision was made after review by the responsible official on behalf of the lead agency of a completed environmental checklist and other information on file with the responsible department. This constitutes the Threshold Determination and form. The intent of this declaration is to satisfy the requirement of the State Environmental Policy Act (RCW 43.21C), including the requirement to inform the public of agency decisions pursuant to SEPA.

- Determination of Nonsignificance (DNS).** This action has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030(2)(c).
- Determination of Significance (DS).** This action has or may have significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030(2)(c).

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Date:

Seattle Department of Construction and Inspections