

**Public Meeting Tuesday August 29, 6 PM to 7:30 PM**  
**at Webster School (Currently the Nordic Heritage Museum) (3014 NW 67th Street)**  
**Webster School Renovation and Addition Project**  
**(comments due by 5 PM, Thursday Sept. 7) Comment *right away* on the**  
**Environmental Checklist – ask for an EIS / Environmental Impact Statement!**

The Seattle School District plans to demolish part of the school, add buildings on the playground, and make other changes.  
The Draft SEPA Environmental Checklist for Webster School is posted on the School District website at  
<http://sepa.www.seattleschools.org> **(SEPA - State Environmental Policy Act)**

Comments on the Draft SEPA Environmental Checklist are due by: Thursday September 7, 2017 at 5 pm. Send comments to:  
Pegi McEvoy, SEPA Official, Seattle School District No. 1, MS 22-183, P.O. Box 34165, Seattle WA 98124  
206-252-0102; FAX 206-252-0626; Email: [SEPAcomments@seattleschools.org](mailto:SEPAcomments@seattleschools.org); ("please include project name in the email subject line")

**Background.** The proposed project would begin December 2018 and end June 2020, with the school opening in September 2020, and the Nordic Heritage Museum vacating the building in early 2018. [page 1, A.6; page 2, A.11] The Checklist states that "The project will include: Demolition; Modernization and reconfiguration to provide classroom space for up to 450 students; Seismic improvement to the original unreinforced masonry 1908 building; An addition of 7,700 square feet on the west side of the property housing a new gymnasium and covered play area; Structural, mechanical, electrical, data/telecom, modernization/upgrades; and Life safety and sustainability upgrades. Portions of the building's exterior and interior were designated as a Seattle Landmark by the City of Seattle Landmarks Preservation Board in June 2015. Features to be preserved include the site, the exteriors of the 1908 building and 1930 addition, the 1930 meeting room/auditorium, the 1930 library reading rooms, and the halls and stairs of the second and third floors in the 1908 building." [pages 2-3, A.11]

**Some of our concerns:**

- A. City zoning code would not be met. Lot coverage; building height (17% taller); building set-back; parking; on-street bus loading.
- B. Loss of 69% of significant trees, and endangering an Exceptional tree. (*Chinese photinia at SE corner of building*)
- C. Loss of playground space and open space. At least 11% of the playground would be lost, and probably twice that amount.
- D. Loss of on-site parking. The current 67 on-site spaces would be reduced to 5.
- E. Historic and Cultural Preservation. The covered play area should not be demolished. The School Board has requested that the State exempt the Seattle School District from City Landmarks regulations, putting historic features at risk.
- F. Constructing new buildings on the playground (a gym and covered play area). It would be better to restore rather than demolish the (pre-museum) gym and covered play area inside the north portion of the school. Otherwise, construction on the playground causes loss of playground space and blocks use of the playground for event parking and for bus loading and puts these impacts out into the neighborhood (NW 67<sup>th</sup> and NW 68<sup>th</sup> adjacent to the school would be school-bus and passenger-vehicle load / unload zones).
- G. Inadequate description of the project. The Checklist does not say what the reopened Webster will be: a K-5 elementary? A K-8? A high school? Or something else? The project design has proceeded without the School Board settling the issue.

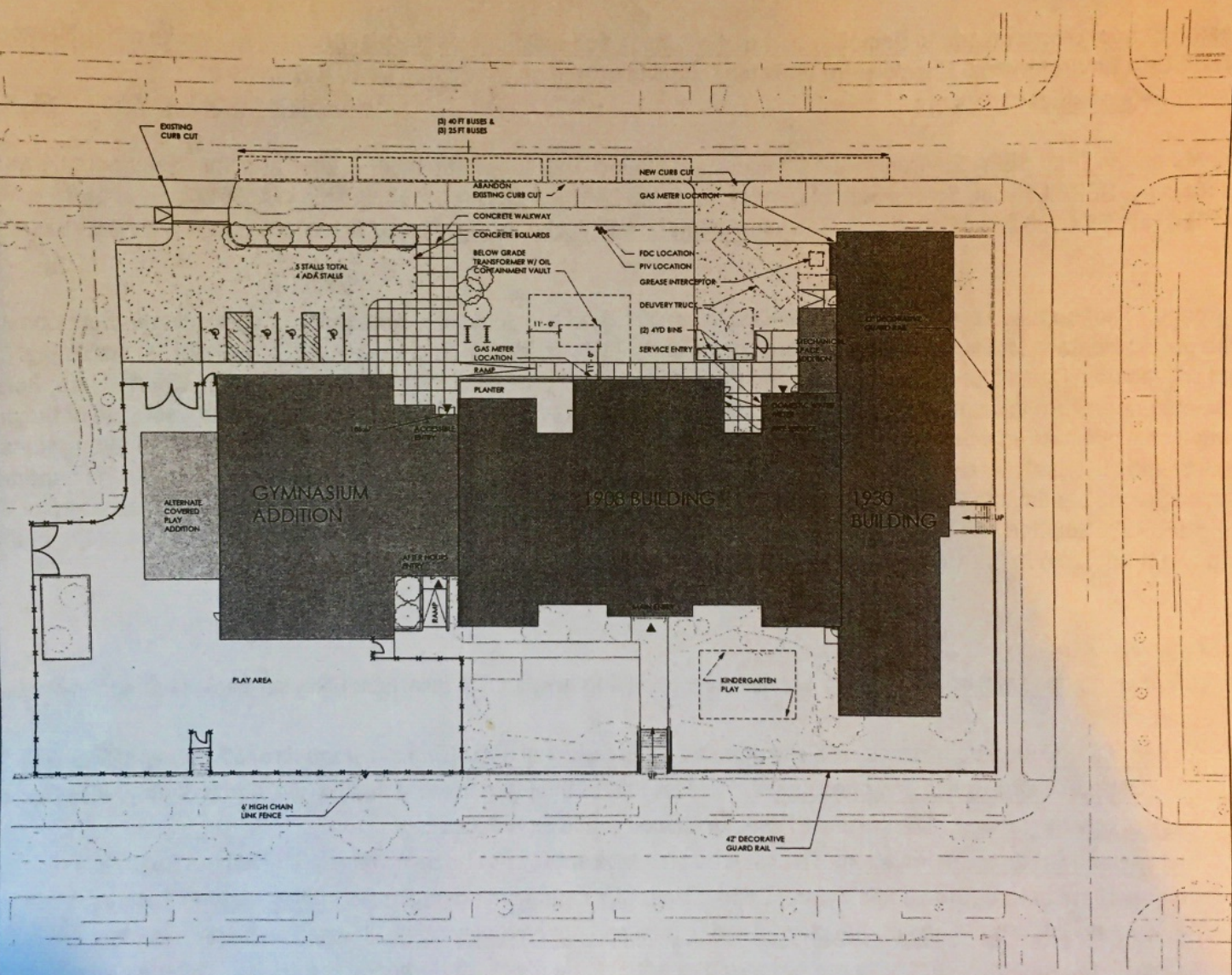
If the School District decides to NOT produce an Environmental Impact Statement (EIS), this means that the District believes that there are NOT probable significant adverse impacts. People who establish an interest in the project (*such as by commenting*) can join with others to administratively appeal such a decision (*not a court appeal, attorneys not required, no filing fee*).

**For more information, contact:**

Chris Jackins, Coordinator, Seattle Committee to Save Schools, P.O. Box 84063, Seattle WA 98124 (phone: 206-521-3288)



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August 25, 2017  
File webster letter on sepa checklist

TO: Pegi McEvoy, SEPA Official  
Seattle School District No. 1, MS 22-183  
P.O. Box 34165, Seattle WA 98124  
206-252-0102; FAX 206-252-0626  
Email: [SEPAcomments@seattleschools.org](mailto:SEPAcomments@seattleschools.org)  
("please include project name in the email subject line")

FROM: Chris Jackins, Coordinator  
Seattle Committee to Save Schools  
P.O. Box 84063, Seattle WA 98124  
206-521-3288

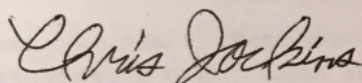
REGARDING: Comments on Draft SEPA Environmental Checklist for the Webster School Renovation and Addition Project (3014 NW 67<sup>th</sup> Street), as posted on the School District website at <http://sepa.www.seattleschools.org/sepa>

Comments due by: Thursday September 7, 2017 at 5 pm

Dear Pegi McEvoy,

Attached are some comments on the Draft SEPA Checklist (State Environmental Policy Act) for the Webster School Renovation and Addition Project (3014 NW 67<sup>th</sup> Street).

Sincerely,



1. The District should issue a Determination of Significance (DS) for the project and provide further detailed environmental review through an Environmental Impact Statement (EIS). I believe that this project has probable significant adverse environmental impacts, and therefore SEPA regulations require a DS and an EIS.
2. Background. The proposed project would begin December 2018 and end June 2020, with the school opening in September 2020, and the Nordic Heritage Museum vacating the building in early 2018. [page 1, A.6; page 2, A.11] The Checklist states that "The project will include: Demolition; Modernization and reconfiguration to provide classroom space for up to 450 students; Seismic improvement to the original unreinforced masonry 1908 building; An addition of 7,700 square feet on the west side of the property housing a new gymnasium and covered play area; Structural, mechanical, electrical, data/telecom, modernization/upgrades; and Life safety and sustainability upgrades. Portions of the building's exterior and interior were designated as a Seattle Landmark by the City of Seattle Landmarks Preservation Board in June 2015. Features to be preserved include the site, the exteriors of the 1908 building and 1930 addition, the 1930 meeting room/auditorium, the 1930 library reading rooms, and the halls and stairs of the second and third floors in the 1908 building." [pages 2,3, A.11] Note that only the online version of the Checklist at A.11 cites "demolition" and only the hard copy version at A.11 cites "modernization".
3. Loss of 69% of significant trees, and endangering an Exceptional tree. The Checklist states that there are 26 significant trees on site, where significant trees are 6 inches or greater diameter at shoulder height (DSH); 18 of these trees are to be removed. [pages 9-11, B.4, Checklist] Removing 69.2% (18 of 26) of these trees is a probable significant adverse impact. The Checklist states that there are "two trees that meet the City of Seattle's definition of an exceptional tree": "a Pacific dogwood, located near the southwestern corner of the existing building, and a Chinese photinia, located next to the southeastern corner of the existing building." Removal of Exceptional trees requires permission from the City. The District expects that the Chinese photinia Exceptional tree "may need to be removed due to close quarters and limited access for site workers. Due to the size, condition, and species of this tree, transplanting may be an option." Endangering an Exceptional tree is a probable significant adverse impact. And the Checklist seemed to lack an examination of impacts on the 11 significant street trees.
4. City zoning code would not be met. The project would not meet the requirements of City zoning code, with the District intending to obtain five exceptions / "departures" from City zoning code: lot coverage; building height; set-back for the covered play area; parking; and on-street bus loading and drop-off rather than the required on-site bus loading and drop-off (considered to be safer). This is an indication of expected adverse impacts from the project. [page 16, B.8.a, Checklist]
  - A. Lot coverage.
    - a. Loss of open space. Loss of open space is an adverse impact, and becomes significant when viewed in the context of loss of open space in the surrounding area and in the city as a whole. The District is currently shrinking the nearby Loyal Heights Elementary playground by at least 30% (at 26<sup>th</sup> NW and NW 77<sup>th</sup>). The Checklist does not seem to provide precise



- figures for the loss of open space, only stating that the site area is 67,500 square feet, and indicating that 7,700 square feet of open space on the playground would be lost to a new gymnasium and covered play area. [pages 2-3, A.11] As a percentage of the entire site, this is a loss of outdoor play area of 11.4% (7,700 as a percent of 67,500), and might be double this percentage if compared to the existing playground size rather than to the entire site.
- b. In the environmental review process at school project after school project (including at Loyal Heights), the District has avoided quantifying the amount of playground space that would be lost. This lack of information starts to appear deliberate, which would argue for the District no longer being allowed to conduct its own environmental review. School Board decision-makers, a part of the audience that the Checklist is meant to inform, spoke at a public Board meeting which I attended, with Board members indicating that they did not want to find themselves surprised by playground size issues again as had occurred at Loyal Heights.
  - c. Before the school was remodeled for museum use, the north side of the school held a covered play area (west side) and gym. An EIS could examine the alternative of restoring the original gym and covered play area, rather than demolishing them (see Figure 3, Site Plan).
  - d. The District previously sold part of the Webster playground (the Webster Park area) to the City along with selling a number of other school sites, instead of retaining it for playground use, stating that the District would never need the sites, which was a mistake. The lot coverage departure from code would seem to be based on the amount of covered area as a percentage of the entire site. If the District reacquired the Webster Park area from the City, the school site would be larger and the lot coverage departure may not be needed. While the Webster Park area could remain available to the public as with other school playground areas, this area was originally intended to be part of the school. An EIS should examine this possibility.
  - e. Recreation. The loss of open space and outdoor play space also adversely impacts recreational opportunities. While the gym and covered play area would provide opportunities for school use, the public will not have the same access to the gym and covered play area. The Checklist states that *"The improvements at the Webster School site would not displace existing recreational uses"*, but also notes that the District *"would coordinate with Parks [the City] on use of Webster Park for recess and physical education"* [page 20, B.12.b, B.12.c] – in other words, the public would be excluded during school use; that would seem to *"displace existing recreational uses"*.
- B. Building height departure from code.
- a. New mechanical equipment (49 feet 6 inches) would be 7 feet 3 inches taller than most of the existing building (42 feet and 3 inches), or 17.1% taller (7.25 as a percent of 42.25). The new elevator penthouse (57 feet 8 inches) would be 1 foot 5 inches taller than the existing chimney (56 feet). [page 18, B.10.a; page 16, B.8.a] This would seem to adversely impact views from homes in the area; the Checklist did not seem to address this impact, and only considered views from "publicly accessible spaces": *"The nature of views from publicly accessible spaces in the area would not change substantially from the existing facility."* [page 19, B.10.b, Checklist]
  - b. Note that the Checklist cites two conflicting values for the height of mechanical units (52 feet [B.10.a] and 49 feet 6 inches [B.8.a]) and for the elevator penthouse (56 feet 8 inches [B.10.a] and 57 feet 8 inches [B.8.a]).
  - c. In terms of the existing building: *"The brick building is the tallest structure on site, and is 42 feet and 3 inches above grade on the street side. The existing chimney is 56 feet high. Both of these exceed the allowable height."* [page 18, B.10.a, Checklist]
  - d. *"The height departure is required to accommodate the mechanical units and elevator penthouse. The existing building has a central boiler located on the lowest floor which does not meet current energy codes. SPS is proposing to locate the mechanical equipment on the roof. An elevator is required for access to the second floor and roof of the 1930 building. The mechanical units would be 49 feet 6 inches high and the elevator penthouse would be 57 feet 8 inches high. Both would exceed the allowable height for public schools in a Single Family Residential Zone and require a height departure."* [page 16, B.8.a]
  - e. Note that the online version of the Checklist at B.8.a references "mechanical units", whereas the hard copy version of the Checklist references "mechanical equipment".
  - f. The District is not saying that the boiler does not function or cannot be upgraded or replaced, only that it wishes to locate mechanical equipment on the roof. There is no discussion of how the current elevator fits into the plans. Alternatives could be examined in an EIS to avoid or mitigate these height departure impacts.
- C. Set-back for the covered play area. The aesthetic and view impacts from having large buildings close to the public sidewalk are adverse. A visit to the Loyal Heights Elementary site gives a concrete example.
- D. Parking.
- a. There are currently 67 striped parking spaces onsite. [page 1, 1.1.1, Traffic Report] *"The completed project would have five parking spaces and would eliminate up to 62 spaces from the existing on-site parking lot used by the Nordic Heritage*



Museum." The five on-site parking stalls would be located in the northwest corner of the site, "four restricted to vehicles with disabled parking permits and one unrestricted space". [page 23, B.14.a; page 23, B.14.c]

- b. Losing 62 parking spaces is unusual for a school project. Large school events are bound to cause adverse impacts to street parking. The only proposed mitigation is for the school to warn residents of upcoming events. [page 25, B.14.h.E]
  - c. Something needs to be done about providing more on-site parking. The asphalt playground could be used for school event parking, except that new buildings are being put on the playground.
  - d. The Checklist neglects to provide the amount of on-site parking required by City code.
  - e. Two to four on-street spaces adjacent to Webster Park on the south side of NW 68<sup>th</sup> Street are proposed to be signed for a two-hour limit, "to preserve some parking capacity for visitors to the adjacent Webster Park on school days". [page 25, B.14.h.D] The assumed need for this parking restriction indicates that parking impacts for neighbors will be noticeable and adverse.
  - f. The Traffic Report states that for large school events "on-street parking demand surrounding the school is expected to be well utilized" but asserts that it would be far less than has been generated by museum events at the site. [page 24, finding #6, Traffic Report] But school events would no longer have 67 on-site parking spaces, only 5 on-site parking spaces.
- E. On-street bus loading and drop-off departure from code.
- a. The Checklist expects 6 school buses at the site, and expects "school-bus and passenger-vehicle school load / unload zones along the south side NW 68<sup>th</sup> Street and the north side of NW 67<sup>th</sup> Street". [page 24, B.14.f, Checklist; page 25, B.14.h.B] On-site bus loading and drop-off is required by City code and is generally considered to be safer than on-street bus loading and drop-off.
  - b. The Checklist states "The project would not cause housing impacts". [page 18, B.9.c] By Seattle Municipal Code SMC 23.51B.002.I.3, it appears that a departure from bus loading may not be allowed. A similar conclusion was stated by land use attorney Rick Aramburu at Wilson Pacific. On the Wilson Pacific project, a letter from Mr. Aramburu stated, "SMC 23.51B.002.I.3 prohibits a departure for bus loading. It states that departures from standards for bus loading and unloading are allowed 'only when departure would contribute to reduced demolition of residential structures.' Since no demolition of residential structures is contemplated, no departure from bus loading is allowable".

5. Lighting. The Checklist states that "The gymnasium would be regularly used for evening events and would be lit during those events." [page 19, B.11.a] A large lit gym would seem to have the potential for distracting impacts on the neighborhood.

6. Noise.

- a. The Checklist states that "Maximum permissible sound levels established in SMC 25.08.425 may be exceeded by construction activities between 7:00 a.m. and 10:00 p.m. on weekdays, and between the hours of 9:00 a.m. and 10:00 p.m. on weekends." And "While construction noise is permitted during evenings and weekends, construction would generally occur between 7:00 a.m. and 5:00 pm. on weekdays." [page 15, B.7.b.3]
- b. Such activities are very disruptive to residents. The District should inquire as to noise and vibration at other currently ongoing projects such as at Loyal Heights Elementary, where residents have told me that noise is easily audible and disruptive inside their homes a half a block away, and shake objects on shelves for nearer neighbors. These are probable significant adverse impacts.
- c. The Checklist states that "The building has been used as the Nordic Heritage Museum for 15 years and reopening the school would represent a new noise source for the neighborhood." [page 14, B.7.b.2, Checklist] This seems to be a typographical error: the neighborhood has been hearing museum noise rather than school noise for much longer than 15 years – the Checklist notes that "Since 1980, the building has housed the Nordic Heritage Museum". [page 2, A.11, Checklist]

7. Historic and Cultural Preservation.

A. The Checklist discussion of the landmarking process is inadequate.

- a. The Checklist states that "The Webster School building was listed as a City of Seattle Landmark in 2015. Features to be preserved include the site, the exteriors of the 1908 building and 1930 addition, the 1930 meeting room / auditorium, the 1930 library reading rooms; and the halls and stair of the first and second floors (actual second and third floors) in the 1908 building." [page 21, B.13.a] The Checklist states that "The addition will go through the Landmarks approval process and will be compatible with the original site, building layout, and architecture". [page 19, B.10.c]
- b. The Checklist should acknowledge that the District routinely argues for rejection of nominations of its schools for landmark status (including its own nominations) and that the School Board has requested that the State exempt the Seattle School District from City Landmarks regulations (November 16, 2016 School Board adoption of legislative agenda), as this context affects impacts and mitigation for historic and cultural resources. Also, the District recently demolished the Indian Heritage High School buildings at Wilson Pacific, even though the buildings were a City Landmark (the District sued the Landmarks



Board, and only saved murals which were NOT landmarked). This context increases the likelihood of significant adverse impacts to historic resources at Webster.

B. The Checklist should acknowledge other historic resources.

- a. The original school office has remained much the same during museum use, and ought to be protected. The Checklist should also note the possibilities of restoring the original gym and covered play area, and the main inside staircase at the south side entrance. Actions that would cause the loss of these possibilities would have adverse impacts.
- b. The Checklist states *"The playcourts on the north side of the 1930 building addition will be demolished and an area rebuilt for a loading / unloading area and garbage / recycling dumpster placement."* [page 17, B.8.b.1.d] It is a needless loss of history to demolish the playcourts (covered playcourts and gym). The original playcourt area had a gate through which trucks could enter.
- c. In proposing to be exempt from City Landmarks regulations, the District argued that it is capable of independent review of historic resources. The SEPA review of the Webster project is a chance for the District to go out of its way to demonstrate such capabilities, including a thorough review of historic and culturally valuable internal features.
- C. The Checklist gives a low value to chances of Native subsurface precontact cultural resources. The Checklist believes that the project area has *"a low sensitivity for intact, buried cultural resources"*. [page 21, B.13.b]
- D. The Checklist should be more cautiously respectful of chances for Native subsurface precontact cultural resources. While Environmental Science Associates (ESA) reviewed soil surveys and *"conducted a literature review of the area"*, ESA apparently did not do its own physical review. [page 22, B.13.c] It seems that even bits of cultural resources, completely "intact" or not, could potentially be important to Indian Tribes. We appreciate that the Checklist specifically references notification of the Duwamish Tribe in the event of an archeological resources discovery [page 22, B.13.d], in line with the School Board's adoption of a Resolution (October 12, 2016) regarding recognition of the Duwamish, and in line with the City of Seattle being named after a Duwamish Chief. The District should consider on-site archaeological monitoring during project construction.

8. Inadequate description of the project.

- a. The Checklist does not adequately describe the project, and therefore is unlikely to adequately disclose likely impacts from the project, in particular because the Checklist does not state what kind of school the reopened Webster will be: a K-5 elementary? A K-8? A high school? Or something else?
- b. The School Board acquiesced (not unanimously) to District staff's determination to proceed with the design of the project without figuring out what kind of school would be at the site. It makes a difference in how much traffic and parking to expect, as well as other impacts.
- c. At Loyal Heights, the neighborhood was told that all elementary schools would now be mega-sized, with 660 or more students. At Webster, without explanation, the stated (current) target size is 450 students. But are they 450 K-5 students? Or 450 high school students, many driving to school? Will Webster be a "neighborhood" school, or a school that draws from the entire city?
- d. The Checklist consistently refers to the site as "Webster School" [page 1, A.1; page 2, A.11; page 13, B.7.a.1; page 14, B.7.b.1; page 15, B.8.a; page 20, B.12.a; page 20, B.12.b; page 21, B.13.a; page 23, B.14.b].
- e. The Traffic Report refers to "Webster School" [page 1, 1.; page 1, 1.1; page 1, 1.1.2], yet also states *"The plan is to re-open the building as an elementary school"* [page 1, 1.1], so the traffic analysis applies to an elementary school (*"average Elementary School"* [page 15, 3.2.1]).

9. Request to extend the public comment period by two weeks. SEPA regulations require that the Checklist documents be made available for public review. But the full Checklist with attachments has not been available on the District's website, while other past project Checklists have been available on the District's website. Instead, the public is instructed to send an email requesting the attachments, or to call to request a paper copy of the Checklist with attachments. I did call to request a paper copy of the Checklist with attachments, and the District kindly responded, but the Checklist did not arrive for a week. Given the unavailability of the full Checklist and the inconsistencies between the version posted online and the hard copy version, the District should provide a fresh public comment period.

10. Comments in Final Checklist. When publishing final Checklists after public review of draft Checklists, the District has lately been choosing to NOT reproduce actual public comments, but rather summarizing the comments instead and responding to the summary of comments. Some of the summaries have been inaccurate. It would be better to have the Checklist include actual copies of public comments received.





**SEATTLE PUBLIC SCHOOLS**  
**DRAFT STATE ENVIRONMENTAL POLICY ACT (SEPA) CHECKLIST ISSUED FOR COMMENT AND**  
**COMMUNITY MEETING FOR WEBSTER SCHOOL RENOVATION AND ADDITION PROJECT**

Seattle Public Schools has prepared a Draft SEPA Checklist in compliance with State Environmental Policy Act regulations on the Webster School Renovation and Addition project. This document provides site-specific environmental review of this capital project. The district seeks written comments on the Draft SEPA Checklist.

The Draft SEPA Checklist will be available to view online at <http://www.seattleschools.org/sepa> beginning August 21, 2017. A hard copy of the document is also available for \$13.00 by contacting Seattle Public Schools by phone at 206-252-0990 or by written request sent to:

Seattle Public Schools  
P.O. Box 34165, MS 22-331  
Seattle, WA 98124-1165

A public meeting will be held on Tuesday, August 29, 2017 from 6:00 PM to 7:30 PM, at Webster School (currently the Nordic Heritage Museum) located at 3014 NW 67<sup>th</sup> St., Seattle, WA to present the project and answer questions.

Written comments regarding the Draft SEPA Checklist must be submitted by **5:00PM on September 7, 2017** to the address below or emailed to [SEPAcomments@seattleschools.org](mailto:SEPAcomments@seattleschools.org).

Pegi McEvoy, SEPA Responsible Official  
Seattle Public Schools  
PO Box 34165, MS 22-183  
Seattle, WA 98124-1165