



City of Seattle

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Department of Planning and Development  
D. M. Sugimura, Director

**CITY OF SEATTLE  
ANALYSIS AND RECOMMENDATION OF THE DIRECTOR OF  
THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

**Application Number:** 3012923  
**Council File Number:** CF #312266  
**Applicant Name:** Lee Michaelis for Seattle Department of Parks and Recreation  
**Address of Proposal:** 1000 – NE 135<sup>th</sup> Street

**SUMMARY OF PROPOSED ACTION**

Council Land Use Action to allow poles and netting for a new driving range to be located on existing golf hole #10 (Jackson Park Golf Course). Pole height will range from 20 ft. to 140 ft. Project also includes 1,600 cu. yds. of material. Determination of Non-Significance prepared by the Seattle Parks & Recreation.

**SEPA DETERMINATION:**  Exempt  DNS\*  MDNS  EIS  
 DNS with conditions  
 DNS involving non exempt grading or demolition or involving another agency with jurisdiction.

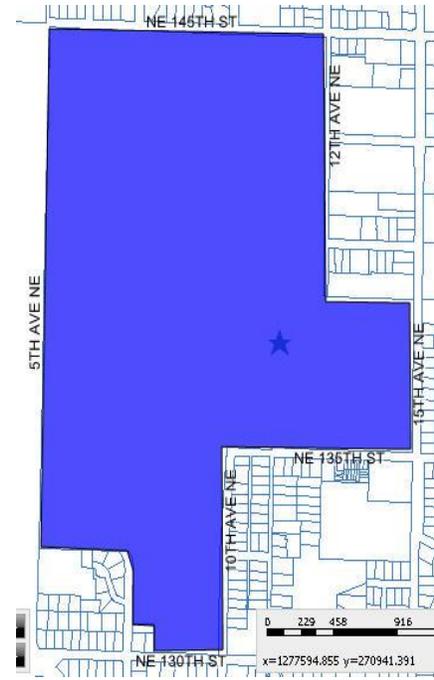
\*Determination of Non-Significance made by the Seattle Department of Parks and Recreation on February 1, 2012.

## **BACKGROUND INFORMATION**

### **Site and Vicinity Description**

The project site is the Jackson Park Golf Course located at the northern boundary of the city in the Olympic Hills neighborhood of North Seattle. The site is bounded by Interstate 5 to the west, the city limits at NE 145<sup>th</sup> Street to the north, 15<sup>th</sup> Avenue NE to the east, and NE 130<sup>th</sup> Street to the south. The entire Jackson Park site comprises about 160 acres. The site of the proposed driving range is located directly to the north of the intersection of 10<sup>th</sup> Avenue NE and NE 135<sup>th</sup> Street, somewhat east of center within the golf course site.

For illustrative purposes only



The area of the proposed driving range and grading work is approximately 179,031 sq. ft. The property is owned by the Seattle Department of Parks and Recreation.

Zoning for the golf course and most of the surrounding area is Single Family Residential with a minimum lot size of 7200 sq. ft. (SF 7200). This zoning is located to the east, west (across Interstate 5, and to the south, with the city limits to the north. Other adjacent zoning includes Lowrise 3 Multi-family Residential to the east and southeast (LR3), and Midrise Multifamily Residential zoning (MR) to the northeast. A small area of Commercial 1 zoning is located nearby as well, to the northeast of the MR zoning that is adjacent to the golf course.

Nearby development consists of primarily single family residential, with some multi-family and commercial structures. Of the streets adjacent to the golf course, NE 145<sup>th</sup> Street and 15<sup>th</sup> Avenue NE are principal arterials, 5<sup>th</sup> Avenue NE is a minor arterial, and the other streets (NE 130<sup>th</sup> Street, 10<sup>th</sup> Avenue NE, and NE 135<sup>th</sup> Street) are non-arterial streets. The site has a variety of topographic features, and a number of Environmentally Critical Areas (ECA's) are located on the site. The ECA's include the following: Riparian corridor, wetlands, liquefaction-prone areas, flood-prone areas, steep slopes (40% average slope or greater), and known slide areas. The ECA's are not within the area proposed for development of the driving range. An exemption from the provisions of the ECA regulations, Seattle Municipal Code Chapter 25.09 was granted pursuant to Section 25.09.045.I by the Seattle Department of Parks and Recreation on March 15, 2012.

In the DNS, Parks and Recreation describes the site use: “The Jackson Park site was purchased in 1927 to create an 18-hole golf course. The course was open to the public in 1930. In 1954, additional property was purchased to create a 9-hole short course. The golf course includes a clubhouse, putting green and cart pathways, parking and associated operations buildings. There is currently no driving range on the site.”

### Proposal

Seattle Parks and Recreation proposes to install poles and nets as part of the Jackson Park Golf Course driving range. Poles are to be installed at the back of the driving range structure (to be proposed under separate permit) and spaced every 50 feet along the driving range. Approximately 36 poles will be installed with varying heights from 20 ft. to 140 ft. Final pole locations will be determined upon completion of the driving range design. The proposal includes:

- Proposed construction of netting and poles
- To accommodate the new driving range, modification of existing golf holes 10, 11, and 18, including up to 1,600 cubic yards of excavation
- Trees on both sides of the existing golf hole no. 10 will be removed

According to the applicant’s consultant, the sole purpose of the current proposal is to apply for and obtain Council approval to waive the height standards of the single family zone and to allow the construction of the poles and nets in support of the future driving range and driving range structure. Other improvement related to the golf course identified in the SEPA DNS published by Parks and Recreation are subject to other permit review and different approval processes and are therefore to be separated from the current proposal.

### Public Comments

Public notice of the proposal was issued on April 26, 2012. No public comments were received.

Seattle Parks and Recreation also conducted two public meetings, on November 9, 2011 and February 9, 2012. Over 100 people attended the first meeting and approximately 75 people attended the second meeting.

A public comment period on the Determination of Non-Significance (DNS) also ran from February 11, 2012 to February 27, 2012 and the DNS was advertised in the Daily Journal of Commerce on February 11, 2012. Seattle Parks and Recreation did not indicate that there were any public comments in response to the DNS.

In addition to the two public meetings at which the driving range proposal was discussed, the improvements to Jackson Park have been discussed as part of the larger update of the 1995 Golf Course Master Plan and 2005 Economic Analysis for all four municipal golf courses. Meetings took place at each golf course in early December 2008, and in January 2009 a briefing and public hearing took place at Park Board of Commissioners.

The public involvement process included working directly with Seattle Parks and Recreation Golf Steering Committee (a citizen advisory group), conducting four public open houses, and outreach to the general public. Because the committee is composed of advocates for each of the four courses, committee members provided in-depth course-specific input; at the same time, the Committee allowed members to review and provide input on the emerging proposals as a group, assisting the design team in equitably balancing the needs and priorities city-wide.

Parks and the design team hosted several open houses, one at each course, to present the draft concepts, options and proposals. Community concerns included safety and security, parking and traffic, appearance of course edges, clubhouse rehabilitation or replacement, new driving ranges and joint use of clubhouses. Outreach e-mail notification and distribution was sent out through Premier Golf (Parks operating partner), the Department of Neighborhoods Service Centers, District Councils, Parks Community Centers and advisory councils, along with press releases to Parks media lists. The open houses were scheduled for the first week in December 2008, immediately prior to the preparation of draft recommendations. All meetings followed Parks public involvement policy, which included postcards mailed to area residents surrounding the Jackson Park golf course, and flyers distributed to branch libraries and Department of Neighborhoods Business Service Centers. An e-mail blast followed to people that had signed in during the Golf Master Plan meetings.

Public comments gathered at the two Jackson Park public meetings and by questionnaires focused on the driving range, new golf cart paths, restrooms, and a proposed perimeter trail around all of Jackson Park. Comments at the November 9, 2011 meeting included concerns about golf ball trespass into the adjacent Executive Estates residential development and that scarce resources were being spent on golf when budget issues are leading to cuts in other valued Parks and City services. The response to the funding concerns was that the projects are funded by golf specific bonds. Further concerns were related to golf course design, the design development and routing of the perimeter trail, possible storm water drainage impacts raised by one neighbor, parking, and traffic impacts.

Comments at the February 9, 2012 meeting included questions about the tree removal. Parks Department Project Manager Garrett Farrell noted that the SEPA analysis prepared by Parks listed a higher number of trees than will actually be removed as some trees will be transplanted and others will remain in place. However, comments included concerns about negative impacts of tree removal. Mr. Farrell stated that Parks does not take tree removal lightly and was removing what was required to make space within Jackson Park for the new golf configuration. He further noted that the design team had worked with the original golf master plan and had made considerable strides to leave areas of the tree canopy untouched. Further comments related to the perimeter trail design.

## **I. ANALYSIS —COUNCIL CONCEPT APPROVAL**

Public parks, including public golf courses, are City facilities permitted outright in Single Family 7200 (SF 7200) zones. The Seattle Land Use Code sets a base height limit for structures in Single Family Zones at 30 feet (SMC 23.44.012). The Seattle Parks Department seeks a Council Concept Approval under SMC 23.76.064 that includes modification of the height development standards of the Single Family Zone as they relate to the proposed driving range netting and poles used to support the netting. Although lighting is also proposed, no lighting will exceed the 30-foot height limit of the zone.

The proposed netting and poles are a necessity for a golf driving range and are designed to accommodate standard golf ball flight trajectories. The designer is Tanner Consulting Group, which specializes in golf and sports field design, as well as other land planning projects. If the proposed netting and pole height was limited to 30 feet, golf balls would not stay within the driving range area. The poles and netting as proposed are a standard design for driving ranges. SMC 23.76.064 includes provisions for the City Council to waive or modify applicable development standards, accessory use requirements, special use requirements or conditional use criteria for City facilities.

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

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

DPD did not receive any comments or recommendations from other City departments or governmental agencies as a result of the public comment period.

Seattle Parks and Recreation issued a DNS dated February 1, 2012, which analyzed the probable impacts of the proposal and determined that none of the impacts were significant or warranted additional conditions.

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

DPD did not receive any public comments in response to the notice of application. Seattle Parks and Recreation did not indicate that they received any public comments in response to the DNS.

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

Seattle Municipal Code section SMC 23.44 includes standards and criteria for proposed development in Single Family zones. Public parks, including public golf courses, are a permitted use in this zone, per Section 23.44.006.C.

**SMC 23.44.010** lists Lot Requirements. The proposal complies with these development standards.

**SMC 23.44.012** lists Height Limits. Seattle Parks and Recreation has requested a maximum pole and netting height of 140 feet. Thirty feet is the maximum permitted height in this zone.

<b>Table A</b>		
<b>Development Standard</b>	<b>Required</b>	<b>Proposed</b>
SMC 23.44.012: Height Limits	30 feet maximum	140 feet maximum

**SMC 23.44.014** lists Yard requirements. The proposal complies with these development standards.

**SMC 25.05.675** includes SEPA policies for the proposed development. The details of DPD's SEPA analysis is provided below. DPD has recommended a restriction to the hours of construction noise due to the impacts to adjacent residents. The details of Seattle Parks and Recreation's analysis is documented in the February 1, 2012 DNS.

**SMC 25.11.030** sets forth exemptions from the tree protection requirements of SMC Chapter 25.11. The proposal calls for removal of up to 48 trees to make space for the new driving range.<sup>1</sup> Information submitted with the initial application for this project on March 27, 2012, indicates that these trees range in diameter from a 2-inch deciduous tree up to a 54-inch conifer. According to DPD Director's Rule 16-2008, Designation of Exceptional Trees, the threshold diameter for an exceptional tree for many conifer species is 2 feet 6 inches (30 inches). Some of the trees proposed to be removed would likely qualify as exceptional under the Director's Rule. Seattle Parks and Recreation has asserted the exemption from the tree protection regulations in subsection 25.11.030.D for tree removal undertaken as part of tree and vegetation management and revegetation of public parkland and open spaces by responsible agencies or departments. Therefore, no further data has been supplied for the trees. The DNS notes that trees will be evaluated for transplant prior to removal, and further notes that over 352 trees have been planted at Jackson Park since 2008, with 16 new trees to be added in this phase of work.

**The Seattle Comprehensive Plan** policy LU70 requires, "Establish height limitations in single-family residential areas that establish predictable maximum heights, maintain a consistent height limit throughout the building envelope, maintain the scale relationship between a structure and its site, address varying topographic conditions, control view blockage and encourage pitched roofs."

The Land Use Code has been developed in accordance with Comprehensive Plan policies. The height limitation of 30 feet for most structures in single family zones makes sense and is most consistent with the Comprehensive Plan when applied to typical neighborhoods developed with residential uses and other uses permitted outright in single family zones. With respect to Jackson Park, however, the site is much larger than typical single family properties and even larger, at 160 acres, than most sites in more intensive zones. Seattle Parks and Recreation and their consultants have provided documentation,

<sup>1</sup> Plans show 48 trees to be removed. The environmental checklist filed by Parks indicates 46 trees to be removed.

including analysis of views from streets surrounding Jackson Park, that the proposed poles and netting will be sufficiently distant from any existing residential or other development near the golf course to have minimal effect. The views into the driving range area are either shielded by trees or at sufficient distance that the driving range will blend with the overall view. As noted in the DNS, the golf course is surrounded by a perimeter of large trees and there are very limited views across the site. The new driving range and associated nets and poles will be located not on the perimeter of the site but towards the middle where the views of the facility from surrounding residences will be limited. The pole height will be the same or less than many of the perimeter conifers which will screen the project.

Policies E9.5 and E23 both say, “Strive to achieve no net loss of tree canopy coverage starting in 2008, and strive to increase tree canopy coverage by 1 percent per year up to a total of 40 percent, to reduce storm runoff, absorb air pollutants, reduce noise, stabilize soil, provide habitat, and mitigate the heat island effect of developed areas.” Seattle Parks and Recreation has stated in the DNS that trees will be evaluated for transplant prior to removal. Further, transplanting and new planting shall be coordinated with golf work to ensure long term viability of trees. Efforts shall emphasize species selection for replacement trees to ensure long term viability of new plantings. Over 352 trees have been planted at the Jackson Park golf course since 2008. Thus, while existing trees will be removed, it is possible to conclude that the proposed driving range development is consistent with these policies, in terms of striving to increase the overall tree canopy in Jackson Park.

Accordingly, the proposal appears to be consistent with the Comprehensive Plan.

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

Seattle Parks and Recreation issued a DNS on February 1, 2012, as described above. Environmental documentation associated with the DNS includes:

- SEPA Checklist, dated January 25, 2012

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

Based on the development standards, criteria, and applicable policies, it appears that the proposed development would meet all requirements with the exception of netting and pole height.

Seattle Parks and Recreation has demonstrated that the proposed netting and pole height is necessary to accommodate the golf driving range. Seattle Parks and Recreation has demonstrated that light spillage and glare to adjacent residential properties will be mitigated by shielded light fixtures placed at or below the 30-foot height limit of the zone and existing mature trees at the property lines. DPD recommends approval, and does not recommend any conditions related to the height of the poles and netting.

As described in the SEPA analysis below, the proposed grading and construction would be located adjacent to residential development in a Single Family residential zone. However, the nearest residential development is about 400 feet from the area of work. While the proposed grading and construction would result in machinery and traffic noise, the City's Noise Ordinance will address the impact of noise in this case.

## **RECOMMENDED DECISION - COUNCIL CONCEPT APPROVAL**

DPD recommends **APPROVAL** of the proposal with the requested modification to development standard of height as described in Table A.

## **II. ANALYSIS – STATE ENVIRONMENTAL POLICY ACT (SEPA)**

On February 1, 2012, Seattle Parks and Recreation made a Determination of Non-Significance for the Jackson Park driving range proposal. Project specific environmental impacts of the improvements have been disclosed and analyzed in the documents provided by Seattle Parks and Recreation, acting as Lead Agency.

The Seattle SEPA Ordinance provides substantive authority to require mitigation of adverse environmental impacts resulting from a proposed project (SMC 25.05.655 and 25.05.660). Mitigation, when required, must be related to specific environmental impacts identified in an environmental document and may only be imposed to the extent that a given impact is attributable to a proposal, and to the extent that the mitigation is reasonable and capable of being accomplished. Additionally, mitigation may be imposed only when based on policies, plans and regulations referenced in SMC 25.05.665 to SMC 25.05.675 inclusive (SEPA Overview Policy, SEPA Cumulative Impacts Policy, SEPA Specific Environmental Policies). In some instances, local, state or federal regulatory requirements will provide sufficient mitigation of an impact and additional mitigation imposed through SEPA may not be necessary.

### **Short-term Impacts**

The following temporary construction-related impacts are expected and were described in the DNS: 1) hydrocarbon emissions from construction vehicles and equipment; 2) decreased air quality due to increased dust and other suspended particulates from building activities; 3) potential soil erosion and potential disturbance to subsurface soils during site work; 4) increased traffic and parking demand from construction personnel; 5) increased noise and vibration from construction operations and equipment; 6) displaced recreational users; 7) consumption of renewable and non-renewable resources; and 8) greenhouse gas emissions. Although not significant, the impacts are adverse and mitigation measures are appropriate as specified below.

City codes and/or ordinances apply to the proposal and will provide mitigation for some of the identified impacts. Specifically, these are: 1) The Seattle Grading Code and Seattle Stormwater Code require soil erosion control techniques; 2) Street Use Ordinance (watering streets to suppress dust, obstruction of the pedestrian right-of-way during construction, construction along the street right-of-way, and sidewalk repair); 3) Building Code (construction measures in general) and requirement of a Temporary Erosions and Sedimentation Control Plan; and 4) The

Noise Ordinance to regulate the time and amount of construction noise permitted in the City. Best Management practices, such as mulching and seeding, will be implemented at the site to minimize erosion during construction. Puget Sound Clean Air Agency regulations require control of fugitive dust to protect air quality. Compliance with these applicable codes and ordinances will be adequate to achieve sufficient mitigation and further mitigation by imposing specific conditions is not necessary for these impacts. The proposal is located approximately 400 feet from any residential development, and therefore the Noise Ordinance addresses any noise impacts.

### Construction

Construction traffic is listed as a short term potential impact. The DNS notes that there are adequate areas on-site for the construction crews and equipment. The site is adjacent to an arterial which provides convenient truck access consistent with the requirements of the Street Use Ordinance. There will be approximately 9,000 cu. yds. of material moved around as the driving range is constructed and three golf holes are realigned. Materials will be balanced on site to minimize heavy truck hauling on the adjacent street network. Construction traffic and haul route(s) will be designated, and notices and signage will alert pedestrians and drivers to times of day and peak activities. Thus no further conditioning is necessary or warranted.”

### Recreation

The DNS describes potential short term impacts to recreation users. While some golf holes will be realigned the golf course will remain open. No significant adverse recreation impacts are anticipated and no mitigation is warranted or necessary.

### Long-term Impacts

Long-term or use-related impacts are also anticipated, as a result of approval of this proposal including: increased surface water runoff due to greater site coverage by impervious surfaces, loss of plant and animal habitat, increased bulk and scale from the netting and poles, increased traffic in the area and increased demand for parking due to maintenance of the facility; and increased demand for public services and utilities. Seattle Parks and Recreation has discussed many of these impacts in the February 1, 2012 Determination of Non-Significance. Many of these impacts are limited in scope and not considered significant. Some of these impacts are also addressed by other codes and policies such as the Stormwater Code and Grading Code (SMC 22.800 and 22.170); the Utilities section of the Seattle Municipal Code (SMC 21), and the Seattle Energy Code (long-term energy consumption). Some additional discussion is of other impacts is warranted.

### Traffic and Parking

SMC 25.05.675.M lists SEPA policies for parking, and 25.05.675.R lists SEPA policies for traffic. The DNS states, “Currently, the golf course operates from dawn to dusk and normal golf course traffic is currently limited after dark. Private parties and functions at the club house extend the hours of operation into the evening. The driving range will be lit and operational until 10 pm. After the driving range is operational, golf traffic for the fifty range stalls is expected to continue until the range closes at 10 pm. Many of the users of the range will be existing golf

patrons who play a round of golf and then stay to also practice at the range. However, people will also come to just use the range. Peak volumes are expected to coincide with high use of the course during good weather golf days. The majority of additional trips will be golfers coming to use the range after normal course hours, and after the peak commute times. The Jackson Park Golf Course is adjacent to and accessed from 15<sup>th</sup> Avenue NE, a City arterial, which provides direct access to Interstate 5 via NE 145<sup>th</sup> and NE 125<sup>th</sup> Streets. The adjacent arterials provide convenient vehicle access. Recent (2010) Seattle Department of Transportation information notes 14,000 Average Annual Daily Traffic (AADT) trips on 15<sup>th</sup> Avenue. Given the surrounding traffic volumes, the additional trips associated with the new driving range are not anticipated to be significant.” No significant adverse parking and/or parking impacts are anticipated and no mitigation is warranted or necessary.

Light and Glare, Height Bulk and Scale

SMC 25.05.675.G lists SEPA policies for height, bulk and scale, and 25.05.675.K lists SEPA policies for light and glare. The DNS states, “the range will be lit and the nets and poles will be up to 140 feet above the existing grade. The golf course is surrounded on the north, south and east by single and multi-family residences. The golf course is surrounded by a perimeter of large trees and there are very limited views across the site. The new driving range and associated nets and poles will be located not on the perimeter of the site but towards the middle where the views of the facility from surrounding residences will be limited. The pole height will be the same or less than many of the perimeter conifers which will screen the project. No perimeter trees are proposed for removal. The driving range lighting design will draw on golf specific strategies including down lighting on the structure, lighting balls from behind hitting stations and illuminating target green areas only. The lights will be designed and installed to maximize cutoff and spillover light.” No adverse light and glare or height, bulk and scale impacts are anticipated, and no mitigation is warranted or necessary.

Summary

In conclusion, several impacts to the environment would result from the proposed development. However, the conditions are not significantly adverse, and no mitigation is warranted.

**RECOMMENDED CONDITION(S) – COUNCIL CONCEPT APPROVAL and SEPA**

None

Signature: \_\_\_\_\_ (signature on file) Date: August 9, 2012  
William K. Mills, Senior Land Use Planner  
Department of Planning and Development

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