FINAL PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

for the

Seattle Public Schools BEX VI Capital Levy Program

Prepared by



July 2024

EA Engineering, Science, and Technology, Inc., PBC
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Fieldwork Studios
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June 26, 2024

To: Recipients of Building Excellence VI Final Programmatic Environmental Impact Statement



Dear Reader:

The Final Programmatic Environmental Impact Statement (PEIS) discusses the potential environmental impacts that could result from the implementation of projects proposed for the Building Excellence VI (BEX VI) Program. This program is a continuation of the levy program begun in 1995 to care for Seattle Public Schools' (SPS) building inventory and to respond to the community's changing needs.

This Final PEIS evaluates the impacts of three alternatives: (1) a no action alternative; (2) an alternative that would improve conditions with replacement schools, additions, modernizations, and play area or field improvements; (3) an alternative that would improve conditions with additions, modernizations, and play area or field improvements. Alternatives (2) and (3) would each include athletic field improvements and lighting projects, school safety equipment and supplies, technology upgrades, and systems repair and replacement projects. This document evaluates the impacts at a non-project or programmatic level. Specific projects proposed under the BEX VI Program will undergo additional project-level State Environmental Policy Act (SEPA) review in the form of a SEPA checklist, SEPA EIS, or addendum to this PEIS, as appropriate.

On January 16, 2024, SPS issued a Determination of Significance (DS) and initiated the scoping process for the Draft PEIS. The Draft PEIS was issued April 8, 2024, and the comment period was open until May 8, 2024. SPS received a total of four comment letters or emails on the Draft PEIS. Those comments and responses are included in this Final PEIS. Where appropriate, changes have been made to the text in the Final PEIS in response to comments or to provide clarification or updates to the information.

I have reviewed the Draft and Final PEIS and am satisfied that it complies with the state SEPA Rules (including WAC 197-11-455, WAC 197-11-460), and Seattle Public Schools SEPA Policy No. 6890. In accordance with WAC 197-11-460(5), SPS will not act on the proposal prior to seven days after issuance of the Final PEIS.

Anyone seeking to appeal this Final PEIS may do so <u>in writing no later than 5 p.m. on Aug. 1, 2024 (at least within</u> 15 days <u>from of</u> the issuance of the Final PEIS on July 3, 2024). Written appeals will be accepted <u>if received no later than 5 p.m. on July 18, 2024, via:</u>

Email: SEPAappeals@seattleschools.org

Mail: Dr. Brent Jones, Superintendent for Seattle Public Schools P.O. Box 34165, MS 32-150 Seattle, WA 98124-1165

Thank you for your participation in this important effort and for your interest in the education of Seattle's children.

Fred Podesta

District SEPA Official

Jud Podesto

FINAL

PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

for the

SEATTLE PUBLIC SCHOOLS

BEX VI CAPITAL LEVY PROGRAM

Seattle Public Schools

Capital Projects and Planning

The Final Programmatic EIS (FPEIS) for the Seattle Public Schools BEX VI Capital Levy Program has been prepared in compliance with the State Environmental Policy Act (SEPA) of 1971 (Chapter 43.21C, Revised Code of Washington); the SEPA Rules, effective April 4, 1984, as amended (Chapter 197-11, Washington Administrative Code); and Seattle Public School Board's policy on SEPA compliance (Policy No. 6890). Preparation of this FPEIS is the responsibility of the Seattle Public Schools Capital Projects and Planning Office. The Capital Projects and Planning Office has determined that this document has been prepared in a responsible manner using appropriate methodology and they have directed the areas of research and analysis that were undertaken in preparation of this FPEIS. 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 Action* and will be considered in making the final decisions on the proposal.

| Date of DPEIS Issuance | April 8, 2024 |
|------------------------|---------------|
| | • • |
| Date of FPEIS Issuance | July 3, 2024 |

FACT SHEET

PROJECT TITLE

Seattle Public Schools Building Excellence (BEX) VI Capital Levy Program

PROPONENT/APPLICANT

Seattle Public Schools (SPS)

LOCATION

SPS serves as the public school district for the City of Seattle community. SPS owns approximately 119 sites throughout the City of Seattle with 105 sites operating as schools, three sites operating as district support buildings and three sites operating as interim school sites. SPS's school facilities include 63 elementary schools, 10 K-8 schools, 12 middle schools, 13 high schools, and six service schools.

PROPOSED ACTION

SPS is planning to implement the BEX VI Capital Levy Program which includes major construction projects (school replacements, building additions and renovations), athletic field improvements, lighting upgrades, facility maintenance projects, and site improvement work. The BEX VI Capital Levy Program will be placed on the February 2025 election ballot for approval by Seattle voters. SPS has developed a preliminary list of projects for the BEX VI Capital Levy Program through a detailed planning and public involvement process that is consistent with Board Policy No. 6901 (Capital Levy Planning).

The preliminary list of potential projects for the BEX VI Capital Levy Program includes projects that would be implemented at up to 42 site locations throughout the SPS service area. The list of potential projects may change throughout the planning process and not all projects will be approved to be in the capital levy that will be put forth to the voters. However, these potential projects are typical of the capital levy projects completed through the previous capital levies and what would be anticipated to be included for the BEX VI Capital Levy Program.

EIS ALTERNATIVES

For the purposes of environmental review, three alternatives are analyzed in this Final Programmatic EIS, including: Alternative 1 – No Action Alternative; Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, and Play Area or Field Improvements; and, Alternative 3 – Improved Conditions with Additions, Modernizations, and Play Area or Field Improvements.

Alternative 1 – No Action Alternative

The No Action Alternative assumes that the BEX VI Capital Levy Program would not occur and there would be no replacement schools, additions, modernizations, play area or field improvements; funding for building system repair and maintenance projects would also not occur. Under this alternative, all existing buildings would be retained in their existing conditions and needs at those school facilities would not be addressed, including deteriorating buildings and safety/maintenance concerns. No upgrades to play areas or athletic fields would occur and no new or upgraded athletic facility lighting would be provided at District facilities.

Alternative 2 - Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area or Field Improvements

Alternative 2 includes potential projects under the BEX VI Capital Levy Program that would be implemented at up to 42 sites around the District. These project types would include: construction projects at up to 15 sites; athletic, playfield, and/or lighting improvements at up to 18 sites; and site improvements at up to 8 sites. The major construction projects could consist of school building replacements, new buildings at new sites, modernization building and additions. reconfigurations, and systems repair replacement projects. The athletic facility and playfield improvements primarily would involve turf replacements, conversions to synthetic turf, and/or facility lighting installations and upgrades.

<u>Alternative 3 - Improved Conditions with</u> <u>Additions, Modernizations, Play Area or Field</u> <u>Improvements</u>

Under Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area or Field Improvements, SPS would implement a modified selection of potential projects identified for the BEX VI Capital Levy Program. Most notably when compared to Alternative 2, Alternative 3 does not include any replacement school projects or new buildings at new site projects. Alternative 3 would include a modernization and addition project for

Bailey Gatzert Elementary School and the Skills Center, as opposed to the replacement school or new buildings on new site projects that are identified for those sites under Alternative 2.

LEAD AGENCY

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PURPOSE OF THIS FINAL PROGRAMMATIC EIS

The SEPA environmental review process is designed to be used along with other decision-making factors to provide a comprehensive review of the proposal (WAC 197-11-055). The purpose of SEPA is to ensure that environmental values are given appropriate deliberation, along with other considerations.

The approval of the *BEX VI Capital Levy Program* is classified under SEPA as a non-project (also referred to as a programmatic) action. A non-project action is defined as an action that is broader than a single specific project, and involves decisions on policies, plans or programs. A Final Programmatic EIS for a non-project proposal does not require site specific analysis; instead, the Final Programmatic EIS addresses conditions at a more general level (WAC 197-11-422). As SEPA Lead Agency, SPS is responsible for ensuring SEPA compliance.

FINAL ACTION

The decision by the SPS School Board, after consideration of environmental impacts and mitigation, to approve the BEX VI Capital Levy Program.

PERMITS AND APPROVALS

Preliminary investigation indicates that the following permits and/or approvals could be required or requested for the Proposed Action or potential projects under the BEX VI Capital Levy Program. Additional permits/approvals may be identified during the review process associated with specific development projects.

Seattle Public Schools

School Board

 Approval of the BEX VI Capital Levy Program and associated Final Programmatic EIS

Agencies with Jurisdiction

• State of Washington

- Dept. of Labor and Industries
- Dept. of Ecology, Construction Stormwater General Permit
- Governor's Executive Order 21-02 Review (if necessary)

• Puget Sound Clean Air Agency

Demolition and Asbestos Notification

City of Seattle

- Master Use Permit
- Grading Permit
- Shoring Permit
- Building Permits
- Electrical Permits
- Mechanical Permits
- Occupancy Permits
- Comprehensive Drainage Control Plain, Inspection and Maintenance Schedule
- Construction Stormwater Control Plan Approvals
- Landmarks Preservation Board Certificate of Approval (if necessary)

• Seattle Department of Transportation

- Street Use Permits (i.e., construction staging, construction operations, etc.)
- Street Improvements (i.e., sidewalks, curbcuts, etc.)

• Seattle-King County Department of Health

Plumbing Permits

FINAL EIS AUTHORS AND PRINCIPAL CONTRIBUTORS

The BEX VI Capital Levy Program Final Programmatic EIS has been prepared under the direction of the SPS Capital Projects and Planning Office and analyses were provided by the following consulting firms:

Final Programmatic EIS Project Manager, Primary Author, Air Quality, Trees & Environmentally Critical Areas, Energy, Noise, Land Use, Aesthetics/Light & Glare, Recreation, and Environmental Health.

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LOCATION OF BACKGROUND INFORMATION

Background material and supporting documents are located at the office of:

Seattle Public Schools Capital Projects and Planning

John Stanford Center for Educational Excellence 2445 3rd Avenue S Seattle, WA 98134 (206) 252-0000

DATE OF DRAFT EIS ISSUANCE

April 8, 2024

DATE OF FINAL EIS ISSUANCE

July 3, 2024

AVAILABILITY OF THE FINAL PROGRAMMATIC EIS

Notification for this Final Programmatic EIS has been distributed to agencies, organizations and individuals noted on the Distribution List contained in **Appendix A** to this document. Copies of the Final Programmatic EIS are available for review on the SPS online SEPA webpage:

(https://www.seattleschools.org/departments/sepa) and at the John Stanford Center for Educational Excellence located at 2445 3rd Avenue South, Seattle, WA. A limited number of copies of this document have been printed and made available for purchase. Additional copies may be purchased for \$13.

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CHAPTER 1

Summary

CHAPTER 1 SUMMARY

This chapter provides a summary of the Final Programmatic Environmental Impact Statement (FPEIS) for the SPS BEX VI Capital Levy Program. This chapter briefly describes the Proposed Action and the EIS Alternatives (Alternatives 1 through 3) and contains an overview of environmental impacts and mitigation measures identified for the alternatives. Please see **Chapter 2** of this document for a more detailed description of the Proposed Action and EIS Alternatives and **Chapter 3** for a detailed analysis of the affected environment, environmental impacts, mitigation measures, and significant unavoidable adverse impacts.

1.1 Project Summary

SPS serves as the public school district for the City of Seattle community. They own approximately 119 sites throughout the City of Seattle including 105 sites operating as schools, three sites operating as district support buildings and three sites operating as interim school sites. SPS's school facilities include 63 elementary schools, 10 K-8 schools, 12 middle schools, 13 high schools, and six service schools. Some of the SPS school programs are distributed over multiple locations, including the Skills Center Program, Interagency Program, Middle College High School, and the Bridges Transition Program.

SPS utilizes two major funding sources for implementing capital construction programs including the Building Excellence (BEX) capital levy and the Buildings, Technology, and Academics/Athletics (BTA) levy. The BEX levies have a six-year funding cycle. Voters approved BEX I in 1995, BEX II in 2001, BEX III in 2007, BEX IV in 2013 and BEX V in 2019.

The purpose of the BEX VI Capital Levy Program is to continue SPS's capital construction program in order to provide high quality learning environments and meet the needs of students and families within Seattle Public Schools. The proposed capital levy will also address existing building condition issues and infrastructure requirements at schools throughout the district. The primary purposes of the BEX VI Program are to respond to the following needs:

- Address building and facility conditions issues through replacement, modernization, and other necessary upgrades and major maintenance.
- Respond to the changing needs of educational programs and the school communities, including safety, accessibility and technology issues.
- Provide improvements to address the increased usage and demand of SPS athletic facilities, recreation spaces, and other facilities.

The BEX VI Capital Levy Program will include funding for construction for replacement schools; renovation/ modernization and additions to existing school buildings; building system repairs and replacements; athletic field synthetic turf and equipment replacements; recreation area lighting; recreation area surface conversions; site improvements; and clean

energy projects. The proposed BEX VI Capital Levy Program will also include funding for equipment, personnel and activities that will not require review under SEPA.

The purpose of this FPEIS is to evaluate the potential impacts that would be associated with implementing the BEX VI Capital Levy Program. SPS is preparing a FPEIS since the specific details of the projects under the BEX VI Capital Levy Program are not known at this time. Potential impacts are evaluated in this document at a non-project or programmatic level since specific project details are not available at this time. A non-project action is defined as an action that is broader than a single site-specific project, and involves decisions on policies, plans, or programs. An EIS for a non-project proposal does not require site-specific analysis; instead, the EIS addresses conditions at a more general level (see WAC 197-11-442 for detail). As appropriate, supplemental environmental review of specific projects under the BEX VI Capital Levy Program would be conducted when sufficient details are available for each project. Future project-specific environmental review would depend on the details of each individual project and could include either a SEPA Environmental Checklist, a supplemental EIS, or an addendum to this FPEIS.

1.2 Proposed Action

The BEX VI Capital Levy Program includes major construction projects (school replacements, building additions and renovations), athletic field improvements, lighting upgrades, facility maintenance projects, and site improvement work at multiple SPS sites throughout the City of Seattle. The BEX VI Capital Levy Program will be placed on the February 2025 election ballot for approval by Seattle voters. SPS has developed a preliminary list of projects for the BEX VI Capital Levy Program through a detailed planning and public involvement process that is consistent with Board Policy No. 6901 (Capital Levy Planning).

While SPS continues to work to refine the BEX VI Capital Levy Program project list, an initial list of potential projects has been provided for the purposes of this FPEIS analysis. The list of potential projects may change throughout the planning process and not all projects will be approved to be in the capital levy that will be put forth to the voters. However, these potential projects are typical of the capital levy projects completed through the previous capital levies and what would be anticipated for the BEX VI Capital Levy Program.

Potential projects under the BEX VI Capital Levy Program that would be implemented at up to 42 sites around the District. These project types would include: major construction projects at up to 15 sites; athletic, playfield, and/or lighting improvements at up to 18 sites; and site improvements at up to 8 sites. The major construction projects could consist of school building replacements, new buildings at new sites, modernization and additions, building reconfigurations, and systems repair and replacement projects. The athletic facility and playfield improvements primarily would involve turf replacements, conversions to synthetic turf, and/or facility lighting installations and upgrades.

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1.3 EIS Alternatives

For the purposes of environmental review, three alternatives are analyzed in this FPEIS, including: <u>Alternative 1</u> – No Action Alternative; <u>Alternative 2</u> – Improved Conditions with Replacement Schools, Additions, Modernizations, and Play Area or Field Improvements; and, <u>Alternative 3</u> – Improved Conditions with Additions, Modernizations, and Play Area or Field Improvements.

Alternative 1 - No Action Alternative

Alternative 1 – No Action Alternative assumes that the BEX VI Capital Levy Program would not occur and there would be no replacement schools, building additions, building modernizations, play area or field improvements; funding for building system repair and maintenance projects would also not occur. Under this alternative, all existing buildings would be retained in their existing conditions and needs at those school facilities would not be addressed, including deteriorating buildings and safety/maintenance concerns. No upgrades to play areas or athletic fields would occur and no new or upgraded athletic facility lighting would be provided at District facilities. The condition of play areas and athletic fields would deteriorate through continued use and athletic facilities could potentially be taken out of service due to deterioration. SPS would continue to experience high demand and a shortage of athletic fields. No systems repair and maintenance projects, equipment upgrades, or site improvement projects would occur under the No Action Alternative.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Under Alternative 2, SPS would implement the BEX VI Capital Levy Program that is being developed through its planning process. Since the BEX VI Capital Levy Program is currently being developed through SPS's standard process which takes into account a variety of facility needs and constraints, Alternative 2 is considered the preferred alternative. Alternative 2 includes several different types of projects that allow SPS to continue to meet the future needs of the District and its students. These projects include school replacements, new buildings and new sites, modernizations and additions, athletic field improvements (synthetic turf and equipment replacements), athletic facility lighting improvements (upgrades and new lighting); play area surface conversions (conversion to synthetic turf), site improvement projects (e.g., stormwater improvements, site development, new fields, etc.), clean energy projects, and system repair and maintenance projects.

Although a final list of specific projects has not been completed at this time, SPS has prepared a preliminary list of potential projects which serve as the basis for the programmatic analysis in this FPEIS. The final list of projects for the BEX VI Capital Levy Program will ultimately be selected by the Seattle School Board and could include projects that are not on this list. In the event that a project is added to the BEX VI Capital Levy Program project list subsequent to this FPEIS, it would be anticipated to be of similar scope (e.g., improving facility condition by replacement or modernization and addition, athletic facility project upgrades or other site improvements) and therefore the potential range of

1-3

impacts would be expected to be similar to those described in this FPEIS. Similar to those projects identified in this FPEIS, any project that may be newly selected for the final BEX VI Capital Levy Program project list would also undergo project-level environmental review, as necessary, prior to implementation. Please refer to **Chapter 2** and **Table 2-2** for a summary list of the projects included in the preliminary potential project list for Alternative 2.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Under Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area or Field Improvements, SPS would implement a modified selection of potential projects identified for the BEX VI Capital Levy Program. Most notably when compared to Alternative 2, Alternative 3 does not include any replacement school projects or new buildings at new site projects (e.g., Bailey Gatzert ES, Sacajawea ES, Whitman MS, Seattle World School gym, or new Skills Center). However, Alternative 3 would include a modernization and addition project for Bailey Gatzert ES and the Skills Center, as opposed to the replacement school or new buildings on new site projects that are identified for those sites under Alternative 2. Alternative 3 also includes the same building reconfiguration, athletic field, play area, site improvements, lighting, and system repair/maintenance projects as Alternative 2. See **Table 2-2** for a summary of projects assumed for Alternative 3.

1.4 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 Final Programmatic EIS. **Table 1-1** provides a summary of the potential impacts that would be anticipated under the 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 – No Action Alternative | Alternative 2 | Alternative 3 |
|---|---|--|
| 3.1 Air Quality | | |
| No construction-related emissions from potential projects under the BEX VI Capital Levy Program would occur. To the extent portable classroom buildings may be needed to accommodate increased enrollment, there could be small, temporary construction-related emissions while those buildings are installed on sites. | Construction for potential projects under the BEX VI Capital Levy Program would generate temporary dust and emissions from construction activities. The level of dust and emissions would likely be the greatest for replacement school and new buildings at new site projects. Some construction activities could also cause temporary odors (e.g., paving or roofing operations). | Construction-related impacts would be less than Alternative 2 since no building replacement or new buildings at new site projects would be provided. |
| No new buildings, additions or modernization projects would occur that could result in improved air quality emissions and efficiency. | Operation of new buildings and building additions would result in new building space on site that would generate operational emissions. However, SPS buildings are required to meet Building Emissions Performance Standards and incorporate energy efficiency and pollution reduction measures that could result in a reduction in emissions from existing conditions. Similarly, to the extent modernization projects result in improved air quality emissions it could reduce emissions compared to existing conditions. | Operational air quality impacts would be similar to or less than Alternative 2. |
| To the extent increased enrollment occurs it would result in increased vehicle trips and emissions. No athletic field improvements would be provided that could generate increased use and trips. | Potential increased enrollment associated with new buildings and additions would result in increased vehicle trips and emissions. Increased use of athletic fields would also result in increased vehicle trips and emissions. | Similar to or less than Alternative 2. |

| Alternative 1 – No Action Alternative | Alternative 2 | Alternative 3 |
|---|--|---|
| 3.2 Trees and ECAs | | |
| No construction activities associated with the BEX VI Capital Levy Program would occur and no impacts to trees or environmentally critical areas (ECAs) would be anticipated. Potential placement of portables would minimize siting issues and result in minor increases in stormwater runoff. | Construction of replacement schools, new buildings or additions could require tree removal. All potential tree removal and replacement would comply with Seattle's Tree Ordinance. Development of potential projects could occur proximate to ECAs but would be minimized through project-specific design and compliance with Seattle's Critical Areas Ordinance. Construction noise could also result in temporary noise disturbance for wildlife. | Construction-related impacts would be less than Alternative 2 since no building replacement or new buildings at new site projects would be provided. |
| No new development would occur under the BEX VI Capital Levy Program and operational impacts would not be anticipated. | Operation of replacement schools, new buildings and additions could result in increases in stormwater runoff to wetlands or riparian corridors. Project-specific design would comply with Seattle's Stormwater Manual. Operation of potential projects could result in increased noise which could disturb wildlife. | Operational impacts to trees and ECAs would be similar to or less than Alternative 2. |
| 3.3 Energy | | |
| No construction-related energy usage associated with the BEX VI Capital Levy Program would occur. To the extent portable buildings are necessary it would require a small amount of construction-related energy use. | Construction of potential projects under the BEX VI Capital Levy Program would result in energy usage associated with construction equipment, vehicles and workers. | Construction-related energy use would be less than Alternative 2 since no building replacement or new buildings at new site projects would be provided. |

| Alternative 1 – No Action Alternative | Alternative 2 | Alternative 3 |
|---|--|--|
| No new development would occur under the BEX VI Capital Levy Program and operational energy-related impacts would not be anticipated. | Operation of potential building development projects under the BEX VI Capital Levy Program would require energy to operate new buildings, additions, and field lighting. Projects would be required to meet State Clean Building Performance Standards, Seattle Building Emissions Performance Standards and SPS policies to provide enhanced energy efficiency. Efficiency measures for new buildings, additions and modernization could result in reduced energy use compared to existing site conditions. | Operational energy use would be similar to or less than Alternative 2 but would also result in less potential for more energy efficient buildings. |
| 3.4 Noise | | |
| No construction-related noise associated with the BEX VI Capital Levy Program would occur. To the extent portable buildings are necessary it would generate a small amount of temporary construction-related noise. | Construction activities for potential projects under the BEX VI Capital Levy Program would result in temporary increases in noise. Construction activities would comply with Seattle's Noise Code. Construction workers and traffic delays could also result in temporary increases in vehicular noise. | Construction-related noise would be less than Alternative 2 since no building replacement or new buildings at new site projects would be provided. |
| To the extent increased enrollment occurs it could result in a minor increase in operational and transportation-related noise. | Increases in operational noise would primarily be related to student-generated noise, building operational systems and vehicle traffic noise. Extended use of athletic facilities with new lighting would result in additional noise later into the evenings. Such increases in noise are not anticipated to rise to the level of a significant impact. | Operational increases in noise would be similar to or less than Alternative 2. |
| 3.5 Land Use | | |
| The BEX VI Capital Levy Program would not move forward and no construction-related land use impacts would occur. | Construction-related impacts from potential projects under the BEX VI Capital Levy Program that could affect surrounding land use would include air quality, noise and transportation. These | Construction-related impacts would be less than Alternative 2 since no building replacement or new buildings at new site projects would be provided. |

| Alternative 1 – No Action Alternative | Alternative 2 | Alternative 3 |
|---|--|--|
| | potential impacts are discussed further in their respective sections. | |
| If necessary, portables buildings could be provided and would need to meet applicable land use code requirements. If necessary, SPS would apply for a departure as part of the project-specific design process. Increases in enrollment would result in a minor increase in activity levels that may affect adjacent land uses. | Replacement schools, new buildings and building additions could be taller and/or larger than existing buildings and result in an increase in height and bulk when compared to existing conditions. New buildings on new site projects would result in a change in use which would need to be consistent with the Seattle Land Use Code. Increases in activity levels could also occur with potential projects, including noise, traffic, air quality, and recreation that could affect adjacent land uses. | Operational land use impacts would be similar to or less than Alternative 2. |
| 3.6 Aesthetics/Light and Glare | | |
| The BEX VI Capital Levy Program would not move forward, and no construction-related aesthetic impacts would occur. To the extent that portable buildings are necessary it could result in minor, temporary construction impacts. | Development of potential projects would result in temporary construction impacts from construction staging, material storage, vegetation removal, and the presence of construction vehicles, equipment and workers. | Construction-related impacts would be less than Alternative 2 since no building replacement or new buildings at new site projects would be provided. |
| If portable buildings are required, it could result in minor changes to the aesthetic character of a potential site. | Potential replacement schools, new buildings and building additions would likely result in changes in aesthetic character due to increased height, bulk and scale. Visual changes would be noticeable from adjacent properties. No SEPA protected views are anticipated to be affected by potential BEX VI Capital Levy Program projects. | Aesthetic changes would be similar to or less than Alternative 2 since no building replacements or new buildings and new site projects are assumed. |
| To the extent that portable buildings are necessary it would add a small amount of light and glare to a potential site. | Potential replacement schools, new buildings and building additions would add new sources of light and glare to sites. New potential athletic facility lighting projects would also add new sources of light and glare and extend the use of those facilities | Light and glare impacts would be similar to or less than Alternative 2. |

| Alternative 1 – No Action Alternative | Alternative 2 | Alternative 3 |
|---|---|--|
| | into the evening hours. Potential lighting projects would be designed to meet Seattle lighting standards and guidelines for spill light and significant light and glare impacts would not be anticipated. | |
| 3.7 Recreation | | |
| The BEX VI Capital Levy Program would not move forward and no construction-related impacts to recreation would occur. | Construction activities associated with potential replacement schools, new buildings and building additions would result in temporary closure of onsite recreation areas and could result in removal of existing recreation space and replacement in new locations as part of the project specific design process. Potential athletic facility and play area projects would also result in a temporary closure during construction. | Construction-related impacts to recreation would be less than Alternative 2 since no building replacement or new buildings at new site projects would be provided. |
| No improvements would be made to existing fields/play areas which could lead to deterioration and fields/play areas that could be taken out of service. To the extent that increased enrollment occurs it would result in a minor increase in student-related recreation demand. If portable buildings are necessary, it could result in some displacement of existing recreation space on those sites. | Potential replacement schools, new buildings and building additions would result in increased demand for recreation space. Such projects could reduce the overall amount of recreation but also provide updated recreation equipment and incorporate recreation areas and features into the project-specific designs. Athletic field, play area and athletic lighting projects would provide enhanced recreation space to create more usable and durable facilities and allow opportunities for extended use of those facilities. | Operational impacts to recreation would be similar to or less than Alternative 2. |
| 3.8 Cultural Resources | | |
| The BEX VI Capital Levy Program would not move forward and no construction-related impacts to cultural resources would be anticipated. | Potential replacement schools, new buildings and building additions would have the greatest potential to affect cultural resources due to the extent of | Construction-related impacts to cultural resources would be less than Alternative 2 since no building replacement or new buildings at new site projects would be provided. |

| Alternative 1 – No Action Alternative | Alternative 2 | Alternative 3 |
|--|--|--|
| | ground disturbance that would be necessary for these types of projects. | |
| To the extent that increased enrollment occurs and portable buildings are necessary it is anticipated that such buildings would be located in previously disturbed/paved areas and the level of excavation would be minimal. | Previous cultural resource investigations have been completed at some potential BEX VI Capital Levy Program sites (e.g., Whitman MS and Van Asselt Interim Site, Roosevelt HS, and Robert Eagle Staff MS) and indicated low potential for cultural resources at those locations. The DAHP predicative model also provides a high-level estimate for potential cultural resources. Many locations are predicted to have moderate to very high risk for cultural resources and would require a project-specific cultural resources assessment. | Potential cultural resources impacts and potential need for project-specific cultural resource assessments would be similar to Alternative 2. |
| 3.9 Historic Resources | | |
| Potential projects under the BEX VI Capital Levy Program would not occur and no construction-related impacts to historic resources would be anticipated. | Replacement school and new buildings on new site projects would require demolition of an existing building and while the list of projects is not finalized, none of the potential projects for replacement schools are designated as a landmark. Any building over 45 years of age that has not been evaluated for eligibility would require a historical analysis by the City and/or referral to the Landmarks process. | Construction-related impacts to historic resources would be less than Alternative 2 since no building replacement or new buildings at new site projects would be provided. |
| Since no potential projects would occur under the BEX VI Capital Levy Program, a slow deterioration of historic building character could occur due to deferred maintenance. | Potential modernization and addition project would involve alterations to existing buildings. Two potential projects are designated landmarks (Franklin HS and West Seattle HS). As part of the permit process, projects at these sites would require review and approval by the Landmarks Preservation Board and a Certificate of Approval from the Seattle DON. | Potential historic resource impacts from modernization and addition projects would be similar to Alternative. |

| Alternative 1 – No Action Alternative | Alternative 2 | Alternative 3 |
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| 3.10 Transportation | | |
| Potential projects under the BEX VI Capital Levy Program would not occur and no construction-related transportation impacts would be anticipated. | Construction for potential projects would generate traffic associated with truck trips and construction employees traveling to and from the site. The level of traffic would be greatest for larger projects such as replacement schools and new buildings at new site projects. Construction could also require site access changes and temporary closures of sidewalks, on-street parking and/or traffic lanes. | Construction-related transportation impacts would be less than Alternative 2 since no building replacement or new buildings at new site projects would be provided. |
| Since enrollment may increase, some combination of portable buildings, boundary adjustments and program relocation may be required. Depending on locations, placement of portables could reduce onsite parking supply. Increased enrollment would also increase traffic volumes but these impacts are unlikely to be mitigated by project-specific improvement or mitigation measures. | Potential building development projects, particularly those that have potential to add capacity would also generate additional vehicle trips to and from site locations. It is anticipated that due to their size, replacement schools and new buildings at new site projects would have the greatest potential to generate additional vehicle trips. A review of site access and traffic operations would be conducted as part of project-specific environmental review. | Operational trip generation and traffic operation impacts would be similar to or less than Alternative 2 since no building replacement or new buildings at new site projects would be provided. |
| No athletic field, play area or athletic facility lighting projects would be provided that could generate additional vehicle trips. | Potential athletic field, play area and athletic facility lighting projects can result in increased frequency and times of use which generate associated increased in PM peak hour traffic generation when existing facilities would otherwise not allow conditions for use. A review of site access, trip generation and traffic operations would be conducted as part of project-specific environmental review. | Transportation impacts associated with potential athletic field, play area and athletic facility lighting projects would be the same as Alternative 2. |
| 3.11 Environmental Health | | |
| Potential projects under the BEX VI Capital Levy Program would not occur | Construction activities and demolition of existing structures could disturb existing hazardous building | Construction-related environmental health impacts would be less than Alternative 2 since |

| Alternative 1 – No Action Alternative | Alternative 2 | Alternative 3 |
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| and no construction activities or demolition activities would occur that could disturb potential existing hazardous building materials or onsite soils. | materials. As part of the project specific planning and environmental review, a hazardous building materials survey would be completed for projects that require building demolition. | no building replacement or new buildings at new site projects would be provided. |
| In the event that portable buildings are required it is anticipated that they would be located in previously disturbed areas and the level of excavation would be minimal. Project specific research would be conducted to ensure potential locations contain no additional hazardous material issues or proximity to existing cleanup actions. | Potential project sites under the BEX VI Capital Levy Program do not contain any active cleanup actions; however, certain sites (e.g., Arbor Heights ES, Genesse Hill ES, Seattle World School, Chief Sealth HS, and West Seattle HS), have completed actions as documented by Ecology. Project-specific review would ensure that construction and excavation would not disturb completed actions. | Potential impacts associated with Ecology documented cleanup actions would be similar to or less than Alternative 2. |
| Potential placement of portables would be anticipated to be in previously disturbed areas with minimal excavation that would not result in substantial soil disturbance | The majority of potential sites under the BEX VI Capital Levy Program are located in areas with predicted or sampled arsenic and lead levels associated with the Tacoma Smelter Plume that would be below cleanup levels (under 20 ppm). For sites with predicted levels greater than 20 ppm (e.g. Arbor Heights ES, Genesee Hill ES, and West Seattle HS), site specific soil testing would be needed during project-specific planning and environmental review. | Potential impacts associated with Tacoma Smelter Plume cleanup levels would be similar to or less than Alternative 2. |
| Development under the BEX VI Capital Levy Program would not occur and no potential athletic field/play area projects with synthetic turf would be provided. | Potential projects under the BEX VI Capital Levy Program would include athletic field and play area development that would create new synthetic turf recreation space or replacement existing synthetic turf with new synthetic surfaces. Potential projects would continue to follow existing SPS protocols to utilize cork infill, Envirofill or similar eco-friendly materials. Bid documents would also require | Potential impacts associated with new and replacement synthetic turf areas would be the same as described for Alternative 2. |

| Alternative 1 – No Action Alternative | Alternative 2 | Alternative 3 |
|---------------------------------------|--|---------------|
| | certifications disclosing the presence of PFAS chemicals and that PFAS chemicals are not utilized during the manufacture process for synthetic turf systems. | |

Summary of Mitigation Measures and Significant Unavoidable Adverse Impacts

Air Quality

Mitigation Measures

Construction

- Building construction and demolition would be conducted in compliance with Seattle Municipal Code Section 15.22.060B which provides criteria related to the suppression of dust-generating activities.
- During construction, applicable best management practices (BMPs) to control dust, vehicle emissions and equipment emissions would be implemented.
- As applicable, a Construction Management Plan would be prepared for each individual construction project to establish parking areas, construction staging areas, truck haul routes, and provisions for maintaining pedestrian and vehicle routes.
 These measures are intended to, among other things, minimize traffic delays and associated vehicle idling.

Operation

- SPS would continue to maintain and enforce its anti-idling policies to minimize vehicle emissions on and adjacent to its facilities. Neighbors who notice buses idling can contact the SPS Transportation offices.
- SPS major construction projects would continue to meet the Washington Sustainable Schools Protocol, as applicable, which provides criteria for building design to incorporate measures for sustainability, energy efficiency, and pollution reduction.
- Operations for SPS buildings would be required to comply with the City of Seattle's new Building Emissions Performance Standards.

Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse air quality impacts are anticipated to result from implementation of the potential BEX VI Capital Levy Program under the EIS Alternatives. Appropriate project level environmental review would be prepared for individual projects included in the BEX VI Capital Levy Program, and site-specific information about the significance of potential impacts would be further assessed at that time. With appropriate mitigation for each site, no significant adverse air quality impacts are anticipated.

Trees and Environmentally Critical Areas

Mitigation Measures

Construction

- A tree survey and inventory report would be completed by a licensed arborist as part
 of the project-specific design for potential projects under the BEX VI Capital Levy
 Program. The report would identify and classify trees on a potential project site and
 identify trees to be retained and trees to be removed. All tree removal and
 replacement associated with project-specific construction would comply with the City
 of Seattle's Tree Ordinance (SMC 25.11.090).
- ECAs and their buffers would be identified on sites as part of the project-specific design for potential projects and would be avoided to the extent feasible. Projectspecific design and development would comply with the City's ECA regulations (SMC 25.09).
- Construction activities for specific projects would comply with the City of Seattle's ECA regulations (SMC 25.09), as applicable. Implementation of BMPs including a TESC plan would help to minimize sedimentation and control stormwater runoff to ECAs and their buffer areas.
- Site specific geotechnical recommendations would be provided as individual projects are proposed. Measures would be identified as necessary as part of code compliance, based on the specific conditions at the individual project sites.
- All project-specific earthwork and site preparation on potential BEX VI Capital Levy Program sites would be conducted in compliance with relevant grading criteria of the Seattle Municipal Code (Sections 22.170 and 22.802).

Operation

- Project-specific design would include design of a stormwater management system
 for individual site development as necessary. Potential stormwater management
 systems would meet the requirements of the City of Seattle Stormwater Manual (City
 of Seattle, 2021). Compliance with applicable stormwater management requirements
 would minimize the potential for impacts associated surface water runoff.
- As part of project-specific design, potential lighting projects would be designed to minimize light spillage in accordance with City of Seattle regulations and design standards.

Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse impacts to trees or ECAs are anticipated to result from implementation of the BEX VI Capital Levy Program under the EIS Alternatives. Appropriate project level environmental review would be prepared for individual projects

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included in the BEX VI Capital Levy Program, and site-specific information about the significance of potential impacts would be further assessed at that time. With appropriate mitigation for each site, no significant adverse impacts to trees or ECAs are anticipated.

Energy

Mitigation Measures

Construction

- New building development would comply with applicable energy codes, including the City of Seattle Energy Code (SMC 22.700).
- New building development would comply with the Washington State Clean Building Performance Standard (CBPS).
- Consistent with SPS policies and procedures, applicable potential development projects would be designed in accordance with the Washington Sustainable Schools Protocol (WSSP) which serves as the green building guide for new and modernization school construction in the State of Washington and provides criteria and standards for design and construction, including energy efficiency measures.
- As applicable, a Construction Management Plan would be prepared for each individual construction project. These measures are intended to, among other things, minimize traffic delays and associated vehicle idling which would reduce fuel consumption during the construction process.

- All SPS buildings are required to meet the Washington State CBPS. Improvements
 in district buildings that meet these standards would improve the energy efficiency of
 district buildings.
- Operations for SPS buildings would be required to comply with the City of Seattle's Building Emissions Performance Standards.
- SPS would continue to follow the most recent SPS Natural Resources Conservation Policy (No. 6810) and the updated procedures to implement Policy No. 6810 (Superintendent Procedure 6810SP) to provide guidance for SPS facilities operations and reduce natural resource consumption including conservation and more efficient use of energy.
- Consistent with recent SPS field lighting projects, LED lighting fixtures would be utilized which would be more efficient and conserve energy when compared to traditional existing metal halide light fixtures.
- Consistent with recent SPS field lighting projects, field lighting systems would be connected to a fully programmable control system to allow the lighting system to be

scheduled for operation when needed and to be turned off when the field is not in use.

Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse energy impacts are anticipated to result from implementation of the potential BEX VI Capital Levy Program under the EIS Alternatives. Appropriate project level environmental review would be prepared for individual projects included in the BEX VI Capital Levy Program, and site-specific information about the significance of potential impacts would be further assessed at that time. With appropriate mitigation for each site, no significant adverse energy impacts are anticipated.

Noise

Mitigation Measures

Construction

- Construction activities would comply with the City of Seattle Noise Ordinance (SMC 25.08.425) which allows for temporary increases in the maximum permissible sound levels based on equipment type and includes specific times of the day that construction activities can occur.
- As part of their construction contracts, SPS would continue to require that all
 contractors are aware of and comply with applicable local and state noise regulations
 during project-specific construction activities.
- As applicable, a Construction Management Plan would be prepared for individual
 construction projects to establish parking areas, construction staging areas, truck
 haul routes, and provisions for maintaining pedestrian and vehicle routes. These
 measures are intended to, among other things, minimize traffic delays, vehicle idling
 and associated noise.

- New athletic facility lighting projects under the BEX VI Capital Levy Program would undergo a site-specific noise analysis as part of future project-level environmental review and additional mitigation measures could be identified during that process, if necessary.
- SPS's athletic facility use would continue to comply with City of Seattle Parks and Recreation Department Policy #060-P7.1.1, which allows for activities until 9:45 PM.
 Facility security lighting could remain on until 10:00 PM to allow users to safely leave the facility.
- Athletic facility projects under the BEX VI Capital Levy Program would not include the provision of any permanent public address system. Amplified sound through the use of portable systems could be allowed on a limited basis for school-related events

to the extent that they are necessary for the operation of the event/activity. The use of portable amplification systems would be restricted for non-school-related events.

 In the event that specific individual activities may cause noise issues, the City of Seattle maintains a 24-hour noise complaint hotline that can be used by the community surrounding the project site.

Significant Unavoidable Adverse Impacts

During construction activities, some temporary noise impacts would occur; however, SPS would ensure that all construction-related activities comply with the City of Seattle's Noise Ordinance. Appropriate project-level environmental review would be prepared for individual projects included in the potential BEX VI Capital Levy Program, and site-specific information about the significance of potential noise impacts would be further assessed at that time. With appropriate mitigation for each site, no significant adverse noise impacts are anticipated.

Land Use

Mitigation Measures

Construction

 Construction-related land use impacts are not anticipated, and no additional mitigation is identified.

- Project-specific design of potential projects under the BEX VI Capital Levy Program
 would strive to comply with the applicable provisions of the Seattle Land Use Code,
 including SMC 23.51B which identifies the development standards for public schools
 in residential zones.
- Potential increases in height, bulk and scale could be minimized through projectspecific design strategies such as the position/orientation of a building on the site; limits to overall building height; modifications to building bulk; modifications to setbacks; modifications to building façade details; and, implementation of landscaping.
- If necessary and consistent with SMC 23.79, potential projects could apply for a departure as part of the project-specific design process. SPS would comply with the results of the departure process, including any appropriate conditions as required by the City of Seattle.
- As appropriate, additional environmental review would be required for certain
 potential projects under the BEX VI Capital Levy Program and additional specific
 mitigation measures would also be identified, as necessary, during the design
 process and project-specific environmental review.

Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse land use impacts are anticipated to result from implementation of the potential projects included in the BEX VI Capital Levy Program. Appropriate project-specific environmental review will be prepared for individual projects included in the BEX VI Capital Levy Program and additional site-specific information about potential land use impacts would be further assessed at that time. With appropriate mitigation for each site, significant adverse land use impacts are not anticipated.

Aesthetics/Light and Glare

Mitigation Measures

Construction

Subsequent to construction activities, SPS would restore staging areas at potential
project sites and replant vegetation that was removed as part of construction
activities, as necessary and in accordance with applicable City of Seattle
requirements.

- Potential changes in aesthetic character, including increases in height, bulk and scale, would be minimized through project-specific design strategies such as the position/orientation of a building on the site; limits to overall building height; modifications to building bulk; modifications to setbacks; modifications to building façade details; and, implementation of landscaping. Specific measures to minimize aesthetic impacts at individual sites would be identified during the project-specific design process and environmental review, as appropriate.
- Lighting associated with potential building development projects would be designed
 to minimize light spill and light trespass and would comply with the applicable lighting
 standards and requirements of the City of Seattle, including SMC 23.45.570. Specific
 measures to minimize light impacts on individual sites would be identified during the
 project-specific design process and environmental review, as appropriate.
- Potential new athletic facility lighting would be designed to minimize light and glare impacts through the use of increased pole heights, light fixture shields, and use of LED light technology. Consistent with SMC 23.51B.002(D)(6), a special exemption for height could be applied to allow for increased light pole heights which has been proven to help minimize spill light, light trespass and glare on previous SPS athletic field lighting projects. Specific measures to minimize light and glare impacts on individual sites would be identified during the project-specific design process and environmental review, as appropriate.

• The use of fully programmable control systems for potential new athletic facility lighting projects would allow for lights to be on when scheduled for use and remain off when not scheduled in advance. It would also allow lights to be turned off when athletic facility activities are completed (typically no later than 10:00 PM).

Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse aesthetic, light or glare impacts are anticipated to result from implementation of the potential projects included in the BEX VI Capital Levy Program. Appropriate project-specific environmental review will be prepared for individual projects included in the BEX VI Capital Levy Program and additional site-specific information about potential aesthetic, light and glare impacts would be further assessed at that time. With appropriate mitigation for each site, significant adverse aesthetic, light, and glare impacts are not anticipated.

Recreation

Mitigation Measures

Construction

- Potential projects under the BEX VI Capital Levy Program would comply with applicable City of Seattle requirements to minimize construction impacts that could affect adjacent recreation uses. Mitigation measures for construction-related noise, air quality and transportation are discussed in detail in Section 3.1, Air Quality; Section 3.4, Noise; and Section 3.10, Transportation.
- To the extent feasible, the development of potential athletic field improvements and play area improvements (e.g., synthetic turf replacement or new synthetic turf) would be scheduled during the summer months to minimize potential conflicts and disruption of school uses.

- The BEX VI Capital Levy Program includes several potential projects that would provide opportunities for new and enhanced recreation space/facilities, as well as opportunities for improvements that would expand the use of existing facilities for SPS students and the community.
- As part of the project-specific design process, SPS would strive to minimize the
 displacement and disruption to existing onsite recreation uses while also looking for
 opportunities to provide new and enhanced recreation space and recreation
 equipment to the maximum extent feasible.
- Mitigation measures for operational impacts related to air quality, noise, light and glare, transportation and environmental health are discussed in Section 3.1 Air Quality, Section 3.4 Noise, Section 3.6 Aesthetics/Light and Glare, Section 3.10 Transportation, and Section 3.11 Environmental Health.

Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse recreation impacts are anticipated to result from implementation of the potential projects included in the BEX VI Capital Levy Program. Appropriate project-specific environmental review will be prepared for individual projects included in the BEX VI Capital Levy Program and additional site-specific information about potential recreation impacts would be further assessed at that time. With appropriate mitigation for each site, significant adverse recreation impacts are not anticipated.

Cultural Resources

Mitigation Measures

Construction

- For projects assessed as having a very high potential to adversely impact other cultural resources due to their unique natural or cultural setting, SPS would prepare a Monitoring and Inadvertent Discovery Plan (MIDP) and an archaeologist would actively monitor high risk construction ground disturbance. SPS would notify tribal representatives of the project schedule at least one week in advance of commencement of ground disturbance. Tribal representatives may also conduct site visits to observe construction ground disturbance.
- For projects assessed as having a moderate to high potential to adversely impact cultural resources, SPS would prepare an Inadvertent Discovery Plan (IDP) to establish protocols to be followed if archaeological sites are encountered during construction ground disturbance. Construction personnel would be briefed on the IDP and SPS would notify tribal representatives of the project schedule at least one week in advance of commencement of ground disturbance. Tribal representatives may also conduct site visits to observe construction ground disturbance.
- Archaeological sites identified during construction would be delineated as appropriate, recorded, and evaluated for National Register of Historic Places (NRHP) eligibility. Archaeological sites are protected by state law and, if identified, disturbance or removal of archaeological deposits may require a DAHP-issued permit. Permit applications would require a curation agreement for recovered artifacts and are subject to review by tribal representatives as well as the DAHP. Controlled excavation of a portion of the site by professional archaeologists for data recovery may also be required for the permit.

Operation

 Operational impacts are not anticipated, and no associated cultural resource mitigation is necessary.

Significant Unavoidable Adverse Impacts

At the programmatic level, no significant unavoidable adverse impacts to cultural resources are anticipated to result from implementation of the potential projects included

in the BEX VI Capital Levy Program. Appropriate project-specific environmental review will be prepared for individual projects included in the BEX VI Capital Levy Program and additional site-specific information about potential cultural resource impacts would be further assessed at that time. With appropriate mitigation for each site, significant adverse cultural resource impacts are not anticipated.

Historic Resources

Mitigation Measures

Construction

- Potential projects involving designated Seattle Landmarks will require review and approval by the Landmarks Preservation Board and issuance of a Certificate of Approval by the City of Seattle Department of Neighborhoods (DON).
- Any building over 45 years of age that has not previously been evaluated for eligibility as a Seattle Landmark, will require a historical analysis by the DON Historic Preservation staff and/or referral to the Landmarks process as part of the MUP process. If the property is subsequently designated a Seattle Landmark, potential changes will require a Certificate of Approval.
- When planning potential projects involving designated or eligible historic resources, SPS and its selected design team should consider character-defining features from the outset of the project and craft a sensitive approach to avoid or minimize potential adverse impacts.
- With adjacency review under SEPA, the City Historic Preservation Officer will have the opportunity to review any potential project adjacent to or across the street from a designated Seattle Landmark, for an assessment of adverse impacts on the designated landmark and for comments on possible mitigating measures.

Operation

• Operational impacts are not anticipated, and no associated historic resource mitigation is necessary.

Significant Unavoidable Adverse Impacts

At the programmatic level, no significant unavoidable adverse impacts to historic resources are anticipated to result from implementation of the potential projects included in the BEX VI Capital Levy Program. Appropriate project-specific environmental review will be prepared for individual projects included in the BEX VI Capital Levy Program and additional site-specific information about potential historic resource impacts would be further assessed at that time. With appropriate mitigation for each site, significant adverse historic resource impacts are not anticipated.

Transportation

Mitigation Measures

Construction

- As mitigation for potential construction impacts, a Construction Transportation Management Plan (CTMP) would be developed for each project as required by SPS and City of Seattle. CTMPs are expected to identify site access measures, truck haul routes, construction and hauling schedules that minimize impacts to the surrounding neighborhood. They typically identify temporary lane closures, sidewalk closures, temporary restrictions on on-street parking, and bus-stop relocations, if any are required, and identify any needed detour routes for pedestrians, bicyclists, and/or vehicles.
- Smaller projects would involve fewer transportation impacts and would not likely require a CTMP. However, similar mitigation measures would be implemented to maintain access to school drop off/pick up areas and to minimize impacts to neighboring streets.
- SPS would identify site-specific mitigation measures necessary to minimize construction impacts during design and project-level environmental and permitting review for specific projects.

- As described previously, if an individual project is anticipated to result in increases in vehicle trips, it is expected that site-specific, project-level transportation analysis would be conducted prior to its implementation. If potential operational or safety impacts are identified through project-level analysis, mitigation measures would be identified to minimize or avoid those impacts. Types of transportation-related mitigation measures that could be considered for the BEX VI projects would depend on the exact type, size, and nature of the proposed project and the associated impacts, but could include the following:
 - 1. Access and parking management measures to minimize traffic impacts;
 - 2. Event calendar coordination and public notification;
 - 3. Use, scheduling, and capacity agreements for assembly spaces such as gymnasiums, athletic fields, and performing arts facilities;
 - Coordination with Seattle Schools Traffic Safety Committee related to walk routes, crosswalk locations, signage, pavement markings, and school zone speed limits;
 - 5. Enhanced School Zone speed limit signage (e.g., flashing beacons)
 - 6. Speed enforcement, including use of speed cameras;
 - 7. Monitoring of school-related impacts;
 - 8. Frontage improvements such as curb, gutter, sidewalk, or walkway improvements;
 - 9. Intersection channelization and/or traffic control changes and improvements;

- 10. Coordination with Metro regarding locations and operational requirements for bus stops along the site frontage;
- 11. Establishment and/or relocation of school-bus and/or passenger vehicle loading areas; and,
- 12. Development and implementation of Transportation Management Plans (TMPs) to minimize traffic-related impacts.
- Typically, measures identified as mitigation during project-specific review are incorporated into the proposal. In some cases, additional measures could be imposed by the City of Seattle as conditions of approval of a project and any associated code departures. The types of measures that have been considered for SPS projects as part of the code-departure process include: establishment of parking duration restrictions for on-street parking near schools, modifications to existing parking restrictions, operational requirements (such as staggering concurrent events, or preparation and distribution of event schedules for events held in assembly spaces on school sites), relocations of Metro bus stops, measures to minimize traffic conflicts at locations with narrow travel ways, and occasional use of hard-surface play areas for evening event parking.
- Use of the Van Asselt site for student populations other than elementary and middle school students or that are higher than previously reviewed and permitted could require extensive mitigation given the limited on-site parking and student load/unload capacity. Such measures may need to include remote (off-site) parking, extended loading zones, and substantial programs to reduce vehicle trips.

Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse transportation impacts are anticipated to result from implementation of the projects included in the action alternatives being contemplated for the BEX VI Capital Levy Program. Appropriate project level environmental review will be prepared for individual projects included in BEX VI Capital Levy Program, and site-specific information about the significance of potential impacts will be further assessed at that time. With appropriate mitigation for each site, no significant adverse impacts are anticipated.

Environmental Health

Mitigation Measures

Construction

- A hazardous building materials survey would be conducted during project-specific environmental review and design for potential projects that involve building demolition to detect any potential hazardous building materials and identify appropriate methods for removal and disposal of such materials in accordance with applicable local, state and federal requirements.
- Potential sites have been identified by Ecology within the Tacoma Smelter Plume Area and are predicted to have arsenic and/or lead levels between 20 ppm and 40

ppm (see **Table 3.11-1**). If excavation and soil disturbance are anticipated as part of a specific project on these sites (e.g., Arbor Heights ES, Genesee Hill ES, and West Seattle HS), site specific testing would be conducted during the project-specific environmental review and design process to confirm soil conditions. Testing results would be submitted to Ecology for concurrence.

- As part of the project-specific design process, potential projects on sites with completed cleanup actions (e.g., Arbor Heights ES, Genesee Hill ES, Ballard HS, Chief Sealth International HS, Nathan Hale HS, Seattle World School HS, and West Seattle HS) would ensure that project-related activities would not disturb the completed cleanup conditions as documented by Ecology.
- For potential projects that include new or replacement synthetic turf, SPS would continue to utilize alternatives to TRC infill such as cork infill, Envirofill or a similar eco-friendly infill material. Any TRC infill that is encountered as part of projectspecific development would be disposed of in accordance with applicable regulations.
- Potential projects that include new and replacement synthetic turf would continue to follow procedures and requirements from recent SPS projects, including the development of bid documents at the project-specific level to provide clarity and transparency on the presence of PFAS substances in any synthetic turf materials. Bid documents would be required to address certification regarding the presence or absence of PFAS substances, performance data, and testing protocols. Bidders would also be required to submit certification disclosing the presence of any PFAS chemicals in their turf products and certify that synthetic turf systems do not involve any PFAS chemicals during the manufacturing process.

Operation

• Operational impacts are not anticipated, and no associated historic resource mitigation is necessary.

Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse environmental health impacts are anticipated to result from implementation of the BEX VI Capital Levy Program under the EIS Alternatives. Appropriate project level environmental review would be prepared for individual projects included in the BEX VI Capital Levy Program, and site-specific information about the significance of potential impacts would be further assessed at that time. With appropriate mitigation for each site, no significant adverse environmental health impacts are anticipated.

Description of Proposed Action and Alternatives

CHAPTER 2

INTRODUCTION AND DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

This Final Programmatic Environmental Impact Statement (FPEIS) evaluates potential impacts associated with projects that are being considered for Seattle Public School's (SPS) Building Excellence VI (BEX VI) Capital Levy Program. The capital levy is planned to go before the voters of the City of Seattle in February 2025. This chapter of the FPEIS provides a discussion of the background and planning activities conducted in support of the BEX VI Capital Levy Program, and a description of the FPEIS Alternatives. A description of the No Action Alternative is also provided in this chapter. A detailed description of the environmental elements, including the affected environment, potential environmental impacts, mitigation measures, and significant unavoidable adverse impacts is provided in **Chapter 3** of this FPEIS.

2.1 BACKGROUND

SPS owns approximately 119 sites throughout the City of Seattle with 105 sites operating as schools, three sites operating as district support buildings and three sites operating as interim school sites. SPS's school facilities include 63 elementary schools, 10 K-8 schools, 12 middle schools, 13 high schools, and six service schools. Some of the SPS school programs are distributed over multiple locations, including the Skills Center Program, Interagency Program, Middle College High School, and the Bridges Transition Program. These distributed programs are typically located within high schools, leased spaces, and in community partner spaces.

In September 2021, the Seattle School Board (Board) approved SPS's most recent Facilities Master Plan Update (SPS, 2021). The Facilities Master Plan Update provides information about the district's facilities (including size, capacity and building condition assessment data) and includes recommendations for facilities improvements for the planning horizon from 2021 through 2026. The Facilities Master Plan provides the basis to seek funding through strategic capital construction programs. In alignment with established Board Policy and guidance, SPS also evaluates the need for capital projects based on updated enrollment projections and the educational adequacy of current buildings to address educational program needs. SPS has undertaken part of that planning process to identify the projects that will be included in the BEX VI Capital Levy Program (see further discussion on BEX VI Capital Levy Program Planning in Section 2.5 of this chapter).

SPS utilizes two major funding sources for implementing capital construction programs including the Building Excellence (BEX) capital levy and the Buildings, Technology, and Academics/Athletics (BTA) levy. The BEX VI Capital Levy Program will include funding for construction for replacement schools; renovation/ modernization and additions to existing school buildings; building system repairs and replacements; athletic field synthetic turf and

equipment replacements; recreation area lighting; recreation area surface conversions; site improvements; and clean energy projects. The proposed BEX VI Capital Levy Program will also include funding for equipment, personnel and activities that will not require review under SEPA.

Building Excellence (BEX) Program

The BEX capital levies generally provide funding for construction of new school buildings, replacements of existing buildings, additions/major renovations to existing buildings, and other school facility improvement projects. Additionally, the BEX levies address earthquake and safety issues, provide infrastructure upgrades, perform major preventative maintenance, and make technology system improvements. The BEX Program started in 1995 to support SPS's existing building inventory and respond to the school district's changing needs. The levies have been renewed by the voters every six years since then.

The BEX levies have a six-year funding cycle. Voters approved BEX I in 1995, BEX II in 2001, BEX III in 2007, BEX IV in 2013 and BEX V in 2019. Capital improvements under the BEX I Program included the construction of 5 new or replacement schools and renovation, expansion and/or improvements to 18 other schools. The BEX II Program included redevelopment or additions to 17 school facilities, as well as construction of new facilities, demolition and new construction on existing sites, major redevelopment projects, historic renovations, and programmatic improvements at high schools. The BEX III Program included renovation or replacement of 7 school facilities. It also included infrastructure improvements, health and safety updates, interior upgrades/renovations, replacement/renovation of athletic fields and technology improvements. The BEX IV Program included 17 major building projects including new schools, replacement schools, renovations and additions to existing schools, seismic improvements, athletic field upgrades, and technology improvements.

The current program, BEX V, includes projects to provide additional student capacity and modernize or replace existing school facilities. The BEX V Program allows for the replacement or modernization of 8 existing schools, building additions for one school and one interim school site, and planning for future middle school and elementary school projects. BEX V also includes projects for building systems repairs/maintenance, safety and security improvements, athletic field upgrades, and technology improvements.

Other SPS Levy Programs

The Buildings, Technology, and Academics/Athletics (BTA) Program is funded by a six-year, voter approved capital levy to improve SPS buildings, technology equipment/facilities, academics, and athletic fields. The initial BTA Program levy was approved by voters in 1998 and has also been renewed by the voters every six years since then. SPS is currently operating under the voter approved BTA V Capital Levy that was approved by voters in 2022 and provides approximately \$783 million in funding. BTA V will continue through 2028 and is intended to provide technology funding for all schools across the district, including student, teacher and classroom computers, district software systems, and district technology infrastructure and security. Building facility improvements are also provided at multiple

schools throughout the district, including fire alarm replacements, roof replacement/improvements, window and door replacements, stormwater improvements/repairs, and seismic improvements. The BTA V Capital Levy also includes athletic facility improvements such as synthetic turf replacement, tennis court improvements, gymnasium improvements, and a new athletic field.

Operations levies also provide funding for day-to-day education programs and support educational programs throughout the district that are not fully funded by the state. The most recent Educational Programs and Operations (EP&O) Levy renewed the previous operations levy which expired in 2022. The EP&O Levy will be collected from 2023 through 2025 and is anticipated to raise approximately \$647 million over the three-year period. Funds collected from the EP&O Levy help to pay for teacher and support staff salaries; support programs such as special education, child nutrition and Science, Technology, Engineering and Math (STEM) programs; and, support extracurricular activities and programs such as athletics, arts, drama and music.

2.2 BEX VI PURPOSE AND OBJECTIVES

The purpose of the BEX VI Capital Levy Program is to continue SPS's capital construction program in order to provide high quality learning environments and meet the needs of students and families within Seattle Public Schools. The proposed capital levy will also address existing building condition issues and infrastructure requirements at schools throughout the district. The primary purposes of the BEX VI Program is to respond to the following needs:

- Address building and facility conditions issues through replacement, modernization, and other necessary upgrades and major maintenance.
- Respond to the changing needs of educational programs and the school communities, including safety, accessibility and technology issues.
- Provide improvements to address the increased usage and demand of SPS athletic facilities, recreation spaces, and other facilities.

Planning for the BEX VI Capital Levy Program began with the construction needs identified in the 2021 Facilities Master Plan and included capacity and programmatic needs of schools informed by the equity lens of the district's strategic plan. On October 11, 2023, the Seattle School Board approved guiding principles for the BEX VI Capital Levy Program. These guiding principles set expectations for the selection and implementation of all capital levy projects and include the following:

- <u>Place-Based Strategies</u> Honor the communities in which our schools are located and comprised of through place-based approaches. Our project selection and ranking processes will consider the land, resources, and history, since time immemorial, of each setting and its people.
- <u>Equitable Access</u> Fulfill policy commitments to provide every student with equitable access to a high-quality curriculum, support facilities, and other educational resources, even when this means differentiating resource allocation.

<u>Welcoming Environments</u> – Provide school environments that ensure all students, staff, and families feel seen, heard, and welcomed regardless of race, gender, ethnicity, disability, socioeconomic status, religious affiliation, LGBTQIA+ sexual orientation and gender identity, primary language, and any other identifier, so that every student is a fully included member of their community.

Scoring and ranking of potential projects will prioritize projects based on the following guiding principles:

- <u>High-Quality Learning Environments</u> Invest in educationally inspiring and inclusive schools in the pursuit of academic excellence. Align with District goals and commitments toward an inclusive, collaborative, and high-quality educational experiences for all students. Maintain healthy, flexible, and accessible educational spaces; outdoor education and play spaces; and critical systems (e.g., roofs, mechanical, HVAC, etc.).
- <u>Facilities Planning</u> Ground capital construction planning in District capacity analysis, enrollment projections, and forecasted development and population changes at the local and regional levels.
- <u>Accessible Schools</u> Prioritize accessibility improvements that meet the needs of students with disabilities and requirements of the Americans with Disabilities Act (ADA), including investment in an expedient District response to the accessibility study to be undertaken through BTA V Levy funding.
- <u>Safe and Secure Schools</u> Prioritize recommendations identified in the system-wide safety review that will improve building and site safety, security, and emergency responses preparedness and that align with best practices while reflecting the vision for welcoming schools.
- <u>Technology</u> Ensure technology provides a cohesive learning environment that fosters academic growth and administrative efficiency and allows for continuous improvement.
- <u>Environmental Sustainability</u> Leverage Clean Energy Task Force
 recommendations to transition to clean, renewable energy and reduce energy usage,
 greenhouse gas (GHG) emissions, and carbon footprint consistent with SPS
 commitments. Construct and renovate buildings with a focus on conservation,
 operation costs, and preservation of District investments.

2.3 ENVIRONMENTAL REVIEW AND PURPOSE

Consistent with the provisions of the State Environmental Policy Act (SEPA) (RCW 43.21C and WAC 197-11-050), Seattle Public Schools (SPS) is serving as the lead agency under SEPA (WAC 478-324-010 through -230). The purpose of this FPEIS is to evaluate the potential impacts that would be associated with implementing the BEX VI Capital Levy Program. SPS is preparing a FPEIS since the specific details of the projects under the BEX VI Capital Levy Program are not known at this time. As appropriate, supplemental environmental review of specific projects under the BEX VI Capital Levy Program would be

conducted when sufficient details are available for each project. Future project-specific environmental review would depend on the details of each individual project and could include either a SEPA Environmental Checklist, a supplemental EIS, or an addendum to this FPEIS.

This FPEIS evaluates the potential direct, indirect and cumulative impacts that could occur with the proposed alternatives and is intended to serve as a tool to provide the public, agencies and decision-makers with information regarding the potential ranges of environmental impacts that would be associated with implementation of the BEX VI Capital Levy Program. This FPEIS has been prepared in compliance with the State SEPA Rules and the SPS Board's policy on SEPA compliance (Policy No. 6890).

As noted above, potential impacts are evaluated in this document at a non-project or programmatic level since specific project details are not available at this time. A non-project or programmatic action is defined as an action that is broader than a single site-specific project, and involves decisions on policies, plans, or programs. An EIS for a non-project proposal does not require site-specific analysis; instead, the EIS addresses conditions at a more general level (see WAC 197-11-442 for detail). SPS will comply with SEPA and applicable City of Seattle permit requirements when it initiates specific individual projects under the BEX VI Capital Levy Program. Supplemental environmental review would be completed, as necessary, when specific projects are selected for development under the BEX VI Capital Levy Program. Many of the major construction projects identified in the BEX VI Capital Levy Program (e.g. school replacements, building additions, etc.) would require a Master Use Permit (MUP) from the City of Seattle and some projects would also require departures from the development standards in residential zones. As part of the MUP process, the City of Seattle would review SEPA documents prepared by SPS, including supplemental environmental review documents, if necessary.

2.4 EIS SCOPING

Determination of Significance

On January 16, 2024, SPS issued a Determination of Significance (DS) and initiated the scoping process for the Draft Programmatic EIS (DPEIS). The DS preliminarily identified the following environmental elements for analysis in the DPEIS:

- Air Quality
- Trees & Environmentally Critical Areas
- Energy
- Noise
- Land Use

- Aesthetics/Light & Glare
- Recreation
- Cultural Resources
- Historic Resources
- Transportation

The DS also identified alternatives for the proposed BEX VI Capital Levy Program that would be analyzed in the DPEIS.

The issuance of the DS also included a request for comments on the scope of the DPEIS. Agencies, affected tribes, interested parties and community members were invited to

comment on the scope of the DPEIS, including potential alternatives, environmental elements, probable significant adverse impacts, and mitigation measures. Notice of the scoping period was posted on the SPS website and published in the *Daily Journal of Commerce* on four separate occasions from January 16, 2024 through January 25, 2024.

Scoping

From January 16, 2024 to February 15, 2024, SPS conducted the scoping comment period for the DPEIS during which public agencies, affected tribes and the public were invited to provide input on the scope of the DPEIS. During the scoping period, three comment letters and emails were received, including two comment letters from community members and one letter from the Washington Department of Ecology.

Feedback received during the scoping process included comments on the BEX VI Capital Levy Program process and DPEIS process; historic and cultural resources; identification of potential hazardous/contaminated sites; concerns regarding synthetic turf and associated chemicals; and cumulative impacts. Several other comments were provided that were not related to the BEX VI Capital Levy Program or the scope of this DPEIS, including: concerns regarding prior SPS projects; issues with remote learning; issues with the use of electronic devices at schools; and the makeup of student enrollment.

As noted above, historic resources and cultural resources were originally identified as part of the scope for the DPEIS. The analysis prepared for the DPEIS includes cumulative impacts as part of each environmental element discussion. In response to comments received during the scoping period, SPS has identified and added Environmental Health as an element for analysis in the DPEIS.

2.5 PROPOSED ACTION

As described earlier in this chapter, SPS is planning to implement the BEX VI Capital Levy Program which includes major building construction projects (school replacements, building additions and renovations), athletic field improvements, lighting upgrades, facility maintenance projects, and site improvement work. The BEX VI Capital Levy Program will be placed on the February 2025 election ballot for approval by Seattle voters.

SPS has developed a preliminary list of projects for the BEX VI Capital Levy Program through a detailed planning and public involvement process that is consistent with Board Policy No. 6901 (Capital Levy Planning). Policy No. 6901 was most recently updated in June 2020 and identifies important principles for capital levy planning:

- Levy planning shall be consistent with the commitments identified under Board Policy No. 0030, Ensuring Educational and Racial Equity, and ensure progress toward achieving the goals and commitments outlined under the policy.
- All projects should align with the District's mission, vision and strategic plan.
- Capital projects shall be planned to meet the District's educational needs in the short, intermediate, and long-term.

- The need for capital projects shall be based on enrollment projections, building capacity, building condition surveys, and the educational adequacy of current buildings to address educational program needs.
- Investments shall be made to maintain and improve the physical condition and systems of buildings.
- Investments shall be made to maintain and improve technology operations, equipment and services, including student learning and support, district systems and data, and technology infrastructure and security.
- Annual budgets should establish a regular, consistent budgeting mechanism to fund major preventative maintenance activities as well as technology needs.
- Building and system designs shall be flexible to meet the changing needs of
 educational programs, be responsive to the urban context of schools, include
 advances in technology, and not be tailored to the specific needs of any one program
 to the detriment of future flexibility.
- Input from associated advisory or oversight committee(s) should be sought out and taken into consideration during the planning process.

For the purposes of determining the projects to be included within each levy, the School Board established priorities for the selection of levy projects which are listed below in rough descending order of importance:

- · Racial and educational equity.
- The health, safety and security of students, staff and the public.
- Meeting capacity management needs to assure that short, intermediate, and longterm enrollment are matched with available space, taking into account costs and educational adequacy of facilities.
- Building condition scores for building systems, such as exterior, HVAC, plumbing, and structural.
- Educational adequacy of buildings, focusing on raising student achievement.
- History of past capital projects and future levy plans.

BEX VI Capital Levy Program Planning

In light of these established principles and priorities for the selection of levy projects, SPS has undertaken a planning process to identify the potential projects that will be included in the BEX VI Capital Levy Program. The BEX VI Capital Levy Program planning process includes:

- Reviewing the 2021 Facilities Master Plan Update.
- Reviewing and assessing the current building, system and site condition information.

- Determining what will be needed to meet Board and regulatory requirements for clean energy and energy efficient building operations.
- Assessing needs for accessibility improvements.
- Assessing needs for safety and security improvements.
- Reviewing current capacity and enrollment projections for 5 years, 10 years and 20 years.
- Collecting information on program placement needs.
- Evaluating District technology, including equipment needs, licensing, software, and services, and aligning with the superintendent's initiatives and priorities.
- Consulting with the BEX and BTA Capital Programs Oversight Committee and the Information Technology Advisory Committee.

As part of the planning process, SPS selected Bassetti Architects to develop concept plans for potential replacement or modernization projects. Concept planning provides information needed to determine cost estimates for major construction projects. Concept plans are developed to test fit several building design concepts for sites under consideration to determine what building and site improvements are feasible to accommodate a school's programmatic need. Many projects are studied at the concept level and the development of a concept plan does not guarantee that a potential project will be included in the BEX VI Capital Levy Program or designed in the same manner as shown in a concept plan.

In addition, as part of the planning process for the BEX VI Capital Levy Program, SPS will conduct a number of community engagement opportunities in 2024 to share information with the community and receive input and feedback from the public. Input and feedback from community engagement sessions will be provided to the School Board for their consideration in determining which projects will be included in the official capital projects list that will ultimately be submitted to the Seattle voters for the February 2025 SPS BEX VI Program Capital Levy Election.

BEX VI Initial Potential Projects List

While SPS continues to work to refine the BEX VI Capital Levy Program project list, an initial list of potential projects has been provided for the purposes of this FPEIS analysis. The list of potential projects may change throughout the planning process and not all projects will be approved to be in the capital levy that will be put forth to the voters. However, these potential projects are typical of the capital levy projects completed through the previous capital levies and what would be anticipated to be included for the BEX VI Capital Levy Program. **Table 2-1** summarizes the projects that are included in this preliminary list. **Figure 2-1** illustrates the locations of the potential BEX VI Capital Levy Program project sites.

Table 2-1
BEX VI CAPITAL LEVY PROGRAM POTENTIAL PROJECTS LIST

| Project Site | Project Type |
|--------------------------------|---|
| Major Construction Projects | |
| Bailey Gatzert ES | School Replacement |
| Lowell ES | Modernization & Addition |
| Sacajawea ES | School Replacement |
| Aki Kurose MS | Modernization & Addition |
| Whitman MS | School Replacement |
| STEM K-8 at Boren | Modernization & Addition |
| Franklin HS | Modernization |
| Seattle World School HS | Replacement (Gym) |
| Chief Sealth International HS | Addition |
| West Seattle HS | Addition |
| Interagency HS (Columbia) | Modernization |
| Interagency HS (Roxhill) | Modernization |
| Skills Center (Multiple Sites) | New Building at New Site or Modernization |
| Van Asselt Interim Site | Modernization & Addition |
| John Marshall Interim Site | Modernization & Addition |
| <u>Fields</u> | |
| Eckstein MS | Synthetic Turf Replacement |
| Whitman MS | Synthetic Turf Replacement (Baseball & Soccer Fields) |
| Robert Eagle Staff MS | Synthetic Turf Replacement (Baseball & Soccer Fields) |
| Salmon Bay K-8 | Synthetic Turf Replacement |
| Denny MS/Chief Sealth HS | Synthetic Turf & Equipment Replacement |
| Franklin HS | Synthetic Turf & Equipment Replacement |
| Roosevelt HS | Synthetic Turf & Equipment Replacement |
| Van Asselt Interim Site | Synthetic Turf & Equipment Replacement |
| Lighting | |
| Eckstein MS | New Lights with Turf Replacement |
| Jane Addams MS | New Lights with Turf Replacement |
| Ingraham HS | Upgrade Tennis Court Lights |

| Project Site | Project Type |
|-------------------------------|--|
| Chief Sealth International HS | New Tennis Court Lights |
| Ballard HS | Upgrade Tennis Court Lights |
| Play Area Surface Conversion | |
| Leschi ES | Convert to Synthetic Turf |
| Genesee Hill ES | Convert to Synthetic Turf |
| Bryant ES | Convert to Synthetic Turf |
| Gatewood ES | Convert to Synthetic Turf |
| Concord ES | Convert to Synthetic Turf |
| Site Improvements | |
| Arbor Heights ES | Field Renovations |
| Wedgewood ES | Stormwater Improvements |
| Stevens ES | Site Improvements & Sidewalk |
| Dearborn Park ES | Stormwater & Site Improvements |
| Madison MS | Field Retaining Wall Repair |
| STEM K-8 at Boren | New Synthetic Turf, Track and Field Lighting |
| Cascade Parent Partnership | Site Development |
| Nathan Hale HS | Improvements Adjacent to Thornton Creek |
| Clean Energy Projects | |
| Site and Locations TBD | |

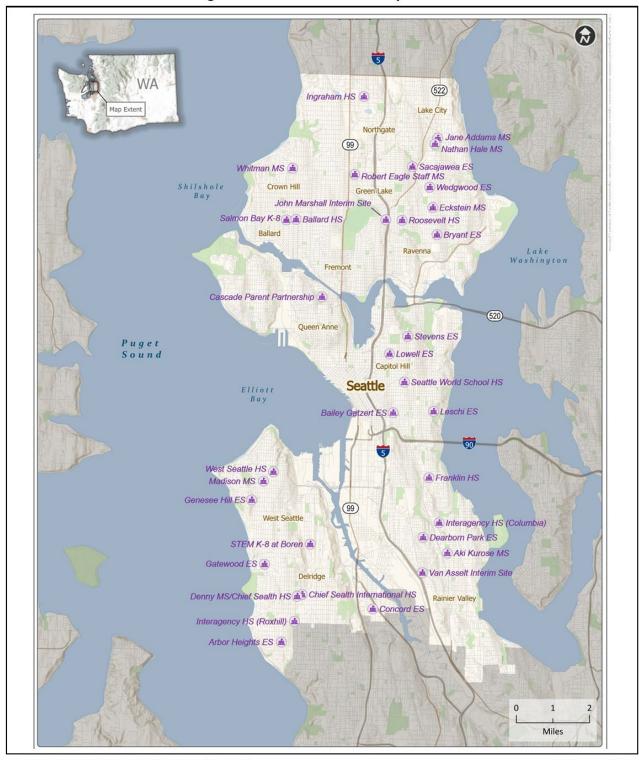
Source: Seattle Public Schools, 2024.

2.6 EIS ALTERNATIVES

Introduction

In order to conduct a comprehensive environmental review for the BEX VI Capital Levy Program, three alternatives are analyzed in this FPEIS including two action alternatives and a No Action Alternative. Alternative 1 is the No Action Alternative and is intended to reflect conditions at SPS facilities if the BEX VI Capital Levy Program does not move forward. The No Action Alternative also provides a baseline for comparing potential impacts associated with the action alternatives. Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements represents the full BEX VI Capital Levy Program potential project list as identified in **Table 2-1**. Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area or Field Improvements is intended to reflect a portion of the BEX VI Capital Levy Program project list but does not include any school replacement projects as those projects are assumed to take place as part of a future capital planning levy.

Seattle Public Schools BEX VI Capital Levy Program Final Programmatic Environmental Impact Statement



Source: Google Maps and EA Engineering, 2023



Figure 2-1
BEX VI Capital Levy Program Potential Project Sites

Alternative 1 - No Action Alternative

Alternative 1 – No Action Alternative is intended to represent the conditions without the BEX VI Capital Levy Program. The No Action Alternative assumes that the BEX VI Capital Levy Program would not occur and there would be no replacement schools, additions, modernizations, play area or field improvements; funding for building system repair and maintenance projects would also not occur. Under this alternative, all existing buildings would be retained in their existing conditions and needs at those school facilities would not be addressed, including deteriorating buildings and safety/maintenance concerns.

No upgrades to play areas or athletic fields would occur and no new or upgraded athletic facility lighting would be provided at District facilities. The condition of play areas and athletic fields would deteriorate through continued use and normal wear and tear. With such continued use and no improvements, SPS athletic facilities could potentially be taken out of service due to deterioration. SPS would continue to experience high demand and a shortage of athletic fields, and this shortage would extend to use by the community as well. No systems repair and maintenance projects, equipment upgrades, or site improvement projects would occur under the No Action Alternative.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Under Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area or Field Improvements, SPS would implement the BEX VI Capital Levy Program that is being developed through its planning process. Since the BEX VI Capital Levy Program is currently being developed through SPS's standard process which takes into account a variety of facility needs and constraints, Alternative 2 is considered the preferred alternative. Alternative 2 includes several different types of projects to allow SPS to continue to meet the future needs of the District and its students. These projects include school replacements, modernizations and additions, athletic field improvements (synthetic turf and equipment replacements), athletic facility lighting improvements (upgrades and new lighting); play area surface conversions (conversion to synthetic turf), site improvement projects (e.g., stormwater improvements, site development, new fields, etc.), clean energy projects, and system repair and maintenance projects.

Although a final list of specific projects has not been completed at this time, SPS has prepared a preliminary list of potential projects which serve as the basis for the programmatic analysis in this FPEIS. The final list of projects for the BEX VI Capital Levy Program will ultimately be selected by the Seattle School Board and could include school projects that are not on this list. In the event that a project is added to the BEX VI Capital Levy Program project list subsequent to this FPEIS, it would be anticipated to be of similar scope (e.g., improving facility condition by replacement or modernization and addition, athletic facility project upgrades or other site improvements) and therefore the potential range of impacts would be expected to be similar to those described in this FPEIS. Similar to those projects identified in this FPEIS, any project that may be newly selected for the final BEX VI Capital Levy Program project list would also undergo project-level environmental review, as necessary, prior to implementation. **Table 2-2** provides a summary of the projects

included in the preliminary project list for Alternative 2 and also provides a comparison with those projects that are assumed for Alternative 3 (see also **Figure 2-1** for map that illustrates the potential project site locations).

Table 2-2
BEX VI CAPITAL LEVY PROGRAM – EIS ALTERNATIVE 2 & 3 PROJECT
SUMMARY

| Project Site | Alternative 2 | Alternative 3 |
|-------------------------------|--|--------------------------|
| Major Construction Projects | | |
| Bailey Gatzert ES | School Replacement | Modernization & Addition |
| Lowell ES | Modernization & Addition | Same as Alt 2. |
| Sacajawea ES | School Replacement | |
| STEM K-8 at Boren | Modernization & Addition | Same as Alt 2. |
| Aki Kurose MS | Modernization & Addition | Same as Alt 2. |
| Whitman MS | School Replacement | |
| Franklin HS | Modernization | Same as Alt 2. |
| Seattle World School HS | Replacement (Gym) | |
| Chief Sealth International HS | Addition | Same as Alt 2. |
| West Seattle HS | Addition | Same as Alt 2. |
| Interagency HS (Columbia) | Modernization | Same as Alt 2. |
| Interagency HS (Roxhill) | Modernization | Same as Alt 2. |
| Skills Center | New Building at a New Site | Modernization |
| Van Asselt Interim Site | Modernization & Addition | Same as Alt 2. |
| John Marshall Interim Site | Modernization & Addition | Same as Alt 2. |
| Athletic Fields | | |
| Eckstein MS | Synthetic Turf Replacement | Same as Alt 2. |
| Whitman MS | Synthetic Turf Replacement (Baseball & Soccer Fields) | Same as Alt 2. |
| Robert Eagle Staff MS | Synthetic Turf Replacement (Baseball & Soccer Fields) | Same as Alt 2. |
| Salmon Bay K-8 | Synthetic Turf Replacement | Same as Alt 2. |
| Denny MS/Chief Sealth HS | Synthetic Turf & Equipment Replacement (Stadium, Softball & Baseball Fields) | Same as Alt 2. |
| Franklin HS | Synthetic Turf & Equipment Replacement | Same as Alt 2. |

| Project Site | Alternative 2 | Alternative 3 |
|-----------------------------------|---|----------------|
| Roosevelt HS | Synthetic Turf & Equipment Replacement | Same as Alt 2. |
| Van Asselt Interim Site | Synthetic Turf & Equipment Replacement | Same as Alt 2. |
| Lighting | | |
| Eckstein MS | New Lights with Turf Replacement | Same as Alt 2. |
| Jane Addams MS | New Lights with Turf Replacement | Same as Alt 2. |
| Ingraham HS | Upgrade Tennis Court Lights | Same as Alt 2. |
| Chief Sealth International HS | New Tennis Court Lights | Same as Alt 2. |
| Ballard HS | Upgrade Tennis Court Lights | Same as Alt 2. |
| Play Area Surface Conversion | | |
| Leschi ES | Convert to Synthetic Turf | Same as Alt 2. |
| Genesee Hill ES | Convert to Synthetic Turf | Same as Alt 2. |
| Bryant ES | Convert to Synthetic Turf | Same as Alt 2. |
| Gatewood ES | Convert to Synthetic Turf | Same as Alt 2. |
| Concord ES | Convert to Synthetic Turf | Same as Alt 2. |
| Site Improvements | | |
| Arbor Heights ES | Field Renovations | Same as Alt 2. |
| Wedgewood ES | Stormwater Improvements | Same as Alt 2. |
| Stevens ES | Site Improvements & Sidewalk | Same as Alt 2. |
| Dearborn Park ES | Stormwater & Site Improvements | Same as Alt 2. |
| Madison MS | Field Retaining Wall Repair | Same as Alt 2. |
| Cascade Parent Partnership | Site Development | Same as Alt 2. |
| STEM K-8 at Boren | New Synthetic Turf, Track and Field Lighting | Same as Alt 2. |
| Nathan Hale HS | Improvements Adjacent to Thornton Creek | Same as Alt 2. |
| Clean Energy Projects | | |
| Site and Locations TBD | | |
| Source: Seattle Public Schools 20 | 20.4 | |

Source: Seattle Public Schools, 2024.

Replacement Schools and New Buildings at New Site Projects

Under Alternative 2, SPS has identified two elementary and one middle school that would be demolished and replaced, as well as one high school gymnasium; the Skills Center is also identified for a new building on a new site. SPS has evaluated these school facilities as part

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of their planning process and determined that the existing conditions of the buildings do not allow for a modernization or addition project to be cost-effective or efficient to serve the needs of the District and therefore, a replacement building is identified as the preferred option. Schools that are identified for replacement include:

- Bailey Gatzert Elementary School
- Sacajawea Elementary School
- Whitman Middle School

- Seattle World School High School (gym only)
- Skills Center

Modernization and Addition Projects

The BEX VI Capital Levy Program would include several modernization and/or addition projects under Alternative 2, including one elementary school, one middle school, one K-8 school, four high schools, two interim school sites, and skills center uses at multiple sites. SPS evaluated these buildings and determined that full building replacement would not be necessary and that modernization and/or additions to these buildings would be the most cost effective and suitable project to meet the needs of the district. Schools and facilities that are identified for modernization and/or addition projects include the following:

- Lowell Elementary School
- STEM K-8 at Boren
- Aki Kurose Middle School
- Franklin High School
- Chief Sealth International High School
- West Seattle High School

- Interagency High School (Columbia)
- Interagency High School (Roxhill)
- Van Asselt Interim School
- John Marshall Interim School
- Skills Center (Multiple sites)

Athletic Field, Play Area, Lighting and Site Improvements Projects

Athletic Field and Play Area Projects

Athletic field and play area improvements would occur at multiple schools under Alternative 2. Improvements to existing athletic fields would generally include the replacement of existing synthetic turf and field equipment. Play area improvement would include the conversion of play area surface to synthetic turf. Potential athletic field and play area improvements identified for the BEX VI Capital Levy Program under Alternative 2 would include:

- Leschi Elementary School Play Area
- Genesse Hill Elementary School Play Area
- Bryant Elementary School Play Area
- Whitman Middle School Athletic Fields
- Robert Eagle Staff Middle School Athletic Fields
- Denny Middle School and Chief Sealth High School Athletic Fields

- Gatewood Elementary School Play Area
- Concord Elementary School Play Area
- Salmon Bay K-8 Athletic Field
- Eckstein Middle School Athletic Field
- Franklin High School Athletic Field
- Roosevelt High School Athletic Field
- Van Asselt Interim Site Athletic Field

Lighting Projects

Potential new or upgraded athletic facility lighting is also anticipated at five school sites with the BEX VI Capital Levy Program under Alternative 2. Where installed, new field lighting would allow for more facilities to be used in the evening hours for schools and the community. Athletic facility lighting projects under Alternative 2 would include the following:

- Eckstein Middle School Athletic Field (new)
- Jane Addams Middle School Athletic Field (new)
- Ballard High School Tennis Courts (upgrade)
- Ingraham High School Tennis Courts (upgrade)
- Chief Sealth High School Tennis Courts (new)

The potential projects at Eckstein Middle School and Jane Addams Middle School would also include the replacement of the synthetic turf for the athletic field as part of the lighting projects.

Site Improvement Projects

The BEX VI Capital Levy Program identifies several necessary site improvement projects at SPS sites under Alternative 2. The potential projects include stormwater improvements, sidewalk improvements, retaining wall repairs, field renovations, and improvements adjacent to Thornton Creek. Sites that are identified for these types of improvements include the following:

- Arbor Heights Elementary School
- Wedgewood Elementary School
- Stevens Elementary School
- Dearborn Elementary School
- Cascade Parent Partnership Site
- STEM K-8 at Boren
- Madison Middle School
- Nathan Hale High School

SPS also anticipates that clean energy projects would be provided at select locations as part of the BEX VI Capital Levy Program. The specific locations of these projects have not been determined but would be anticipated to result in more efficient, clean energy usage by the District at those locations.

System Repair and Maintenance Projects

The BEX VI Capital Levy Program would also include system repair and maintenance projects at schools and facilities throughout the District to address maintenance and repair needs that have been previously identified in the District's planning processes. Such projects would potentially include: upgrades and repairs to doors, windows, roofs, plumbing, fire safety and suppression systems, heating, ventilation and air conditioning (HVAC) systems, and electrical systems; seismic improvements; intercom replacements; security system improvements; and playground equipment upgrades.

Systems repair and maintenance projects would be anticipated to have no operational impacts on transportation, parking, land use, aesthetics, light/glare, noise, historic or cultural resources, recreation, trees, or environmentally critical areas. The projects would also not have any noise, air quality, energy or light/glare impacts once construction is complete. Since these types of projects are not anticipated to have significant unavoidable adverse impacts, SPS would not conduct additional environmental review for system repair and maintenance projects.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Under Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area or Field Improvements, SPS would implement a modified selection of potential projects identified for the BEX VI Capital Levy Program. Most notably when compared to Alternative 2, Alternative 3 does not include any replacement school projects or new buildings at new site projects. See Table 2-2 for a summary of projects assumed for Alternative 3 and a comparison to those identified for Alternative 2.

Replacement School and New Buildings at New Site Projects

Under Alternative 3, no replacement school projects (Bailey Gatzert Elementary, Sacajawea Elementary, Whitman Middle School, and Seattle World School gym) or new buildings at new site projects (Skills Center) would be provided.

Modernization and Addition Projects

Modernization and addition projects under Alternative 3 would include the projects listed under the BEX VI Capital Levy Program for Alternative 2. In addition, Alternative 3 would include a modernization and addition project for Bailey Gatzert Elementary School and the Skills Center, as opposed to the replacement school or new buildings on new site projects that are identified for those sites under Alternative 2.

Building Reconfiguration Projects

Alternative 3 assumes the same building reconfiguration projects that were included and identified for the BEX VI Capital Levy Program under Alternative 2.

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Athletic Field, Play Area, Site Improvements and Lighting Projects

Alternative 3 includes the same athletic field, play area, site improvement and lighting projects that were included and identified for the BEX VI Capital Levy Program under Alternative 2.

System Repair and Maintenance Projects

Alternative 3 includes the same system repair and maintenance projects that were included and identified for the BEX VI Capital Levy Program under Alternative 2.

2.7 BENEFITS AND DISADVANTAGES OF DEFERRING IMPLEMENTATION OF THE PROPOSAL

The benefits of deferring the Proposed Action and implementation of the BEX VI Capital Levy Program include the following:

- No collection or expenditure of funds for construction projects.
- Temporary construction-related impacts associated with noise, air pollution, and traffic.

The disadvantages of deferring the Proposed Action and the implementation of the BEX VI Capital Levy Program include the following:

- Inability to provide new, modernized educational space to meet the changing needs of educational programs.
- Continued cost associated with maintaining aging buildings and facilities.
- Inability to provide maintenance and upgrades to support and modernize aging buildings and facilities and meet regulatory requirements.
- Inability to provide improvements to SPS facilities that are necessary for the safety, security and accessibility of students, staff and visitors.
- Missed opportunities to provide new and upgraded athletic facilities to serve students and the community.
- Inability to provide needed site improvements at SPS school sites, including stormwater systems, sidewalks, and retaining wall repairs.
- Continued decline of existing buildings, athletic facilities, and other SPS facilities from over-use.
- Inability to implement clean energy and energy efficiency improvements.

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

3.1 AIR QUALITY

This section of the Final Programmatic EIS (FPEIS) describes the existing air quality conditions in the Seattle area and evaluates the potential impacts that could occur as a result of the BEX VI Capital Levy Program. SPS will conduct phased environmental review for the proposed projects under the BEX VI Capital Levy Program. Project-specific environmental review will be completed, as appropriate, for individual projects when the District begins project-specific planning, design and construction activities.

3.1.1 Affected Environment

Existing Conditions

Air Quality

Air Quality Regulatory Overview

Air quality is generally assessed in terms of whether concentrations of air pollutants are higher or lower than ambient air quality standards set to protect human health and welfare. Ambient air quality standards are set for what are referred to as "criteria" pollutants (e.g., carbon monoxide - CO, particulate matter, nitrogen dioxide - NO₂, and sulfur dioxide - SO₂). Three agencies have jurisdiction over the ambient air quality in the Seattle area: the U.S. Environmental Protection Agency (EPA), the Washington State Department of Ecology (Ecology), and the Puget Sound Clean Air Agency (PSCAA). Additionally, the City of Seattle has adopted Building Emissions Performance Standards that regulate emission of greenhouse gases from buildings in the city. These agencies establish regulations that govern both the concentrations of pollutants in the outdoor air and rates of contaminant emissions from air pollution sources. Although their regulations are similar in stringency, each agency has established its own standards. Unless the state or local jurisdiction has adopted more stringent standards, EPA standards apply. These standards have been set at levels that EPA and Ecology have determined will protect human health with a margin of safety, including the health of sensitive individuals like the elderly, the chronically ill, and the very young.

Ecology and PSCAA maintain a network of air quality monitoring stations throughout the Puget Sound area. In general, these stations are located where there may be air quality problems, and so are usually in or near urban areas or close to specific large air pollution sources. Other stations located in more remote areas provide indications of regional or background air pollution levels. Based on monitoring information for criteria air pollutants collected over a period of years, Ecology and EPA designate regions as being "attainment" or "nonattainment" areas for particular pollutants. Attainment status is, therefore, a measure of whether air quality in an area complies with the federal health-based ambient air quality standards for criteria pollutants. Once a nonattainment area achieves compliance with the National Ambient Air Quality Standards (NAAQSs), the area is considered an air quality "maintenance" area. The Seattle area is considered an air quality maintenance area for CO.

However, there has not been a violation of the CO standards in the area in many years and the City meets standards for other criteria pollutants.

Existing Air Quality Overview

Existing air quality in the areas surrounding SPS school and facility sites is generally considered good as evidenced by the City of Seattle being in attainment or a maintenance area for all criteria pollutants with no violations in many years. Existing sources of air pollution in the areas that are associated with SPS school and facility sites is generally dominated by local traffic sources, including school buses and parent vehicles during student drop-off and pick-up times but also includes GHG emissions from building operations. With typical vehicular traffic, the air pollutant of concern is CO. Other pollutants include ozone precursors (hydrocarbons and nitrogen oxides - NOx), coarse and fine particulate matter (PM10 and PM2.5), and SO₂. The amounts of particulate matter generated by well-maintained individual vehicles are minimal compared with other sources, and concentrations of SO₂ and NOx are usually not high except near large industrial facilities. In an effort to reduce air pollution on school sites, SPS also maintains an antiidling policy as part of Superintendent Procedure 6810SP which is intended to decrease air pollution from buses and other vehicles on SPS properties. The policy requires that all vehicles on and adjacent to school properties should be operated to minimize idling to reduce fuel use and air pollution. The policy also states that vehicles shall not be warmed up by idling and engines shall not be left running when not on the road. The District's Facility Operations Department also performs retro-commissioning of district's school buildings.

Greenhouse Gas Emissions

Greenhouse Gases (GHGs), such as carbon dioxide, methane and nitrous oxide, trap heat in the atmosphere and are emitted by both natural processes and human activities. The accumulation of GHG in the atmosphere affects the earth's temperature. While research has shown that earth's climate has natural warming and cooling cycles, evidence indicates that human activity has elevated the concentration of GHG in the atmosphere beyond the level of naturally occurring concentrations resulting in more heat being held within the atmosphere.

There are no specific emission reduction requirements or targets applicable to potential future development, nor are there any generally accepted emission level "impact" thresholds with which to assess potential localized or global impacts related to GHG emissions. Instead, there are State and local policies and programs intended to consider and reduce GHG emissions over time. The Seattle City Council adopted Comprehensive Plan goals and policies in 2007 related to achieving reductions in GHG emissions. The Comprehensive Plan was most recently updated in 2022 and includes updated goals and policies on climate. To carry out these goals and policies, an assessment of GHG emissions from proposed development is required. Under this assessment, developers for projects that trigger environmental review are required to identify the climate change impact of their proposals as shown by calculating the GHG emissions. In addition, the City of Seattle recently adopted the Building Emissions Performance Standards in December 2023 that set interim targets for GHG emissions reductions for buildings with a target to reach an almost 40 percent reduction in emissions in the buildings sector by 2030 and to be net-zero carbon emissions

by 2050. The Building Emissions Performance Standards apply to existing commercial and multifamily buildings that are larger than 20,000 sq. ft. (City of Seattle, 2024).

GHG emissions from existing SPS schools and facilities generally occur from building operations (e.g., heating, cooling, etc.) and transportation sources. Recently constructed SPS school facilities are required to meet the Washington Sustainable Schools Protocol which provides criteria for building design to incorporate measures for sustainability, energy efficiency, and pollution reduction. As applicable, all SPS buildings would also be subject to the City's new Building Emissions Performance Standards as well.

3.1.2 Impacts of the Alternatives

This section of the FPEIS identifies how the potential BEX VI Capital Levy Program under the EIS Alternatives would relate to air quality and GHG emissions during construction and long-term operations.

Alternative 1 – No Action Alternative

Under Alternative 1 – No Action Alternative, the BEX VI Capital Levy Program would not move forward, and no construction activities or associated construction-related emissions would occur at SPS project sites. Existing buildings would remain, no new facilities would be provided, and no improvements would be made to provide greater efficiency or reduce building operational emissions. To the extent that increased enrollment may occur, since public schools are obligated by law to accommodate additional students, additional bus or parent vehicle trips could occur which would result in a minor increase in transportation-related emissions. If portable classroom buildings are required at certain site locations, the installation of those buildings could result in a small, temporary increase in construction-related emissions while those portable buildings are installed on site. Therefore, it is anticipated that the No Action Alternative would not result in any significant, unavoidable adverse air quality impacts.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Alternative 2 includes a package of potential project types under the BEX VI Capital Levy Program that would be implemented at up to 42 sites around the District. These project types would include: major construction projects at up to 15 sites; athletic, playfield, and/or lighting improvements at up to 18 sites; and site improvements at up to 8 sites. The major construction projects could consist of school building replacements, new buildings at new sites, modernization and additions, building reconfigurations, and systems repair and replacement projects. The athletic facility and playfield improvements primarily would involve turf replacements, conversions to synthetic turf, and/or facility lighting installations and upgrades. This section analyzes the range of potential impacts that can result from each project type under Alternative 2. The analysis is presented at a planning level of detail consistent with a programmatic analysis. SPS will conduct appropriate project-level

environmental analysis (including air quality) for each project when sufficient project-level details are available.

Construction Impacts

The following describes potential air quality impacts that could occur during short-term construction of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement Schools and New Buildings at New Site Projects

Under Alternative 2, replacement schools and new buildings at new site projects would result in temporary construction activities that would generate emissions and odors. Demolition of existing structures would require the removal and disposal of building materials, which would generate dust and emissions. Some materials could contain asbestos and if such material was present, demolition contractors would be required to comply with EPA and PSCAA regulations related to the safe removal and disposal of any asbestos-containing materials.

Construction of replacement schools and new buildings on new sites would require the use of heavy trucks, excavators, graders, cranes, pile drivers, and a range of smaller equipment such as generators, pumps, and compressors for construction and grading activities which would result in temporary increases in emissions and dust during construction. With appropriate code and regulation compliance, construction-related equipment emissions would not be likely to substantially affect air quality in the vicinity of any potential development site. Construction contractors would also minimize emissions from construction equipment to the extent practicable by taking steps such as those discussed in **Section 3.1.3**.

Although some construction could cause odors, particularly during paving operations that involve the using tar and asphalt, any odors related to construction would be short-term and localized (and in some areas located within a busy traffic area where such odors would likely go unnoticed). Construction contractor(s) would be required to comply with PSCAA regulations that prohibit the emission of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with enjoyment of life and property.

Construction activities could also result in periodic traffic delays on streets adjacent to project sites and increased vehicle trips associated with construction workers traveling to and from the site. Such delays and increased vehicle trips would result in a temporary increase in vehicle emissions during the construction periods.

Modernization and Addition Projects

Construction of modernization and addition projects under Alternative 2 would result in similar types of impacts as school replacement projects (e.g., emissions and dust from construction activities and equipment, construction-related odors, and vehicle emissions); however, these air quality impacts would likely be lower due to the lower amount of construction-related activity that would be necessary for modernization and addition projects.

Building Reconfiguration Projects

Construction-related air quality impacts for building reconfiguration projects would be similar to or less than the impacts identified with modernization and addition projects discussed above.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Construction of athletic field, play area, site improvement and lighting projects would result in similar types of impacts as school replacement projects (e.g., emissions and dust from construction activities and equipment, construction-related odors, and vehicle emissions); however, these air quality impacts would likely be lower due to the lower amount of construction-related activity that would be necessary for these types of projects. Some level of grading and excavation would typically be necessary for these types of projects and would result in temporary increases in emissions and dust, albeit at a lower level than school replacement projects.

System Repair and Maintenance Projects

Construction-related air quality impacts for system repair and maintenance projects would be less than those impacts associated with modernization and addition projects discussed above.

Operation Impacts

The following describes potential air quality impacts that could occur with the operation of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement School and New Buildings and New Site Projects

Operation of replacement schools and new buildings at new site projects under Alternative 2 could result in increased enrollment and staffing levels at those sites which would result in an associated increase in vehicle trips and vehicle emissions. Increased enrollment could also necessitate an increase in the number of school buses that serve those sites which would result in a minor increase in vehicle emissions. As noted previously, SPS maintains an anti-idling policy to decrease air pollution from buses and other vehicles on and adjacent to SPS properties. These policies have proven effective in reducing vehicle emissions on SPS properties and as such, minor increases in vehicle trips and associated emissions would not be anticipated to result in significant air quality impacts.

In addition, SPS school facility major construction projects are required to meet the Washington Sustainable Schools Protocol which provides criteria for building design to incorporate measures for sustainability, energy efficiency, and pollution reduction. SPS buildings would also be subject to the City's new Building Emissions Performance Standards as well.

Modernization and Addition Projects

Air quality impacts associated with modernization and addition projects are anticipated to be similar to or less than those described for replacement school and new buildings at new site projects, due to the lower amount of development that would be proposed for those types of projects. To the extent that a modernization project results in improved air quality emissions from an existing building, it would result in a reduction in emissions and an upgrade when compared to existing conditions.

Building Reconfiguration Projects

Building reconfiguration projects would be implemented in existing facilities to better accommodate SPS program elements or changes to student needs. These projects would not be anticipated to result in operational air quality impacts.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Athletic field, play area and lighting projects would result in increased use of SPS fields and facilities. The conversion from grass surfaces to synthetic turf would allow for increased and extended use of those facilities. Potential lighting projects would also allow for extended evening use of fields and facilities. Increased uses of athletic fields and facilities would result in an increase in vehicle trips and associated vehicle emissions at those sites. Buses could also be utilized to transport students to athletic fields and facilities for games or practices. As described previously, all buses and vehicles would be subject to SPS's anti-idling policies while on or adjacent to SPS sites.

System Repair and Maintenance Projects

System repair and maintenance projects under Alternative 2 would not be anticipated to result in operational air quality impacts. To the extent that system repair and maintenance projects result in improved air quality emissions from an existing building, it would result in a reduction in emissions and an upgrade when compared to existing conditions.

Cumulative Impacts

Construction associated with projects under the potential BEX VI Capital Levy Program could result in cumulative construction impacts in the City, particularly in areas where other major construction projects are occurring. Construction associated with Alternative 2 could add to the air quality impacts associated with other major construction projects. Some projects in the BEX VI Capital Levy Program could result in increased traffic in some neighborhoods, which could result in a cumulative increase in vehicle-related traffic emissions. However, since the BEX VI Capital Levy Program would be phased over several years and would be distributed across the City, cumulative air quality impacts are anticipated to be limited.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Under Alternative 3, SPS would implement a modified selection of potential projects identified for the BEX VI Capital Levy Program. Most notably when compared to Alternative 2, Alternative 3 does not include any replacement school projects or new buildings at new site projects but does include two additional modernization and addition projects (Bailey Gatzert ES and the Skills Center). See **Table 2-2** for a summary of projects assumed for Alternative 3 and a comparison to those identified for Alternative 2.

Construction Impacts

Under Alternative 3, no school replacement projects or new buildings on new site projects are identified and as such construction-related air quality impacts associated with those types of projects would not occur when compared to Alternative 2. Construction-related air quality impacts for modernization and addition projects would be anticipated to be similar to Alternative 2; however, Alternative 3 includes two additional potential modernization/ addition projects at Bailey Gatzert ES and the Skills Center. These assumptions for Alternative 3 would result in additional impacts from modernization and addition projects when compared to Alternative 2, but such impacts at Bailey Gatzert ES and the Skills Center would be anticipated to be lower than what could occur with the replacement projects for those sites that are identified under Alternative 2.

Construction-related air quality impacts for building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects would be the same as Alternative 2.

Operation Impacts

The potential BEX VI Capital Levy Program under Alternative 3 would result in similar types of operational air quality impacts as those identified for Alternative 2 (e.g., vehicle emissions, building operation emissions, etc.); however, the level of operation-related air quality impacts would be lower since there would be no school replacement projects or new buildings at new site projects under Alternative 3.

Operational air quality impacts would be the same as Alternative 2 for building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects.

Cumulative Impacts

Alternative 3 would be anticipated to result in similar types of cumulative impacts as those identified for Alternative 2. However, the scale of potential cumulative impacts would likely be lower due to the lower level of development under Alternative 3 with no replacement schools or new buildings on new site projects.

3.1.3 Mitigation Measures

The following mitigation measures have been identified to further reduce the potential for air quality and GHG emission impacts associated with the potential BEX VI Capital Levy Program under the EIS Alternatives:

Construction

- Building construction and demolition would be conducted in compliance with Seattle Municipal Code Section 15.22.060B which provides criteria related to the suppression of dust-generating activities.
- During construction, applicable best management practices (BMPs) to control dust, vehicle and equipment emissions would be implemented.
- As applicable, a Construction Management Plan would be prepared for each individual construction project to establish parking areas, construction staging areas, truck haul routes, and provisions for maintaining pedestrian and vehicle routes. These measures are intended to, among other things, minimize traffic delays and associated vehicle idling.

Operation

- SPS would continue to maintain and enforce its anti-idling policies to minimize vehicle emissions on and adjacent to its facilities. Neighbors who notice buses idling can contact the SPS Transportation offices.
- SPS major construction projects would continue to meet the Washington Sustainable Schools Protocol, as applicable, which provides criteria for building design to incorporate measures for sustainability, energy efficiency, and pollution reduction.
- Operations for SPS buildings would be required to comply with the City of Seattle's new Building Emissions Performance Standards.

3.1.4 Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse air quality impacts are anticipated to result from implementation of the potential BEX VI Capital Levy Program under the EIS Alternatives. Appropriate project level environmental review would be prepared for individual projects included in the BEX VI Capital Levy Program, and site-specific information about the significance of potential impacts would be further assessed at that time. With appropriate mitigation for each site, no significant adverse air quality impacts are anticipated.

3.2 TREES AND ENVIRONMENTALLY CRITICAL AREAS

This section of the Final Programmatic EIS (FPEIS) describes existing trees and environmentally critical area (ECA) conditions for the potential BEX VI Capital Levy Program sites and evaluates potential impacts that could occur as a result of development of the BEX VI Capital Levy Program under the EIS Alternatives. SPS will conduct phased environmental review for projects under the BEX VI Capital Levy Program. Project-specific environmental review will be completed, as appropriate, for individual projects when the District begins project-specific planning, design and construction activities.

3.2.1 Affected Environment

Existing Conditions

All SPS school and facility locations, including potential BEX VI Capital Levy Program project site locations, are located within urban areas of the City of Seattle. Each of the sites contain specific natural resources conditions that are unique to that location, including trees and environmentally critical areas (ECAs). The following provides a discussion on those existing natural resource conditions and existing regulations.

Trees

According to the City of Seattle's most recent Tree Canopy Assessment (City of Seattle, 2021), the City's overall tree canopy cover has declined from 28.6 percent in 2016 to 28.1 percent in 2021 (a net loss of approximately 255 acres of tree canopy). In response to this, and in effort to reach the City's Urban Forest Stewardship Plan goal to expand tree canopy cover to 30 percent by 2027, the City recently updated their Tree Protection Ordinance in July 2023.

Trees in the City of Seattle are legally protected under the Tree Protection Ordinance (Seattle Municipal Code [SMC] 25.11) and the Environmentally Critical Areas code (SMC 25.09). The new Tree Protection Ordinance adds tree protections for over 157,000 more trees than the previous ordinance by limiting removal of trees on properties that are not undergoing development and requiring replacement trees for any tree removed that is 12 inches or greater in diameter. The new Tree Protection Ordinance categorizes trees into four tiers. Tier 1 Trees include heritage trees which are designated by the City's Heritage Tree Program¹ and must be retained unless hazardous. Tier 2 Trees include trees that are 24 inches or greater in diameter, tree groves and specific tree species as approved by Director's Rule. Tier 2 Trees may not be removed unless hazardous or as approved as part of an overall development permit. Tier 3 Trees include trees between 12 and 24 inches in

¹ The Heritage Tree Program requires owner approval and trees must be nominated, assessed by a certified arborist, and evaluated by a review committee to meet criteria for health, specimen, historic, landmark and collection (City of Seattle, 2024).

diameter that are not considered Tier 2 Trees by Director's Rule. These trees may not be removed unless deemed hazardous or in need of emergency action except as provided by SMC 25.11.050 (B) and (C); removal is allowed as part of approval of an overall development permit. Tier 4 trees include trees between 6 and 12 inches in diameter and include similar regulations for removal as Tier 3 trees.

SMC 25.11.090 outlines the requirements for tree replacement associated with the removal of Tier 1, Tier 2 and Tier 3 Trees and requires that trees removed in association with development or due to hazardous conditions shall be replaced by one or more new trees, and the size and species shall be determined by the Director. The City of Seattle also recently adopted the One Seattle Tree Plan which was approved in March 2023 and requires that three trees be planted for every tree removed on City-owned land and provides flexibility for property owners to choose to either replant trees onsite or pay the equivalent value into the One Seattle Tree Fund which allows new trees to be spread throughout neighborhoods or public spaces (City of Seattle, 2023).

Under the ECA code (SMC 25.09), trees and vegetation cannot be removed from ECAs such as landslide-prone areas, steep slope erosion hazard areas, wetlands, fish and wildlife habitat conservation areas, and riparian corridors unless there has been approval of a Tree Removal and Vegetation Restoration Plan or approval of a building permit.

Environmentally Critical Areas

The City of Seattle's ECA Code (SMC 25.09) protects and regulates areas of Seattle that provide critical environmental functions, as well as areas that represent particular challenges for development due to geologic or other natural conditions. The goal of the City's ECA regulations is to effectively protect environmentally critical areas and to protect the public safety, while also allowing for reasonable development within the city. Designated environmentally critical areas are defined in SMC 25.09.012 and generally include the following:

Geologic Hazard Areas

- Steep Slope Erosion Hazard Areas steep slopes with an incline of more than 40 percent within a vertical elevation change of at least 10 feet.
- Landslide-Prone Areas potential landslide areas and known landslide areas.
- Liquefaction-Prone Areas areas with loose, saturated soil that loses the strength needed to support a building during earthquakes.
- Peat-Settlement-Prone Areas sites containing peat and organic soils that may settle when the area is developed or the water table is lowered.
- <u>Flood-Prone Areas</u> areas that would likely be covered with or carry water as a result of a 100-year flood event.
- Wetlands areas that are inundated or saturated by water at a frequency and duration to support a prevalence of vegetation typically adapted in saturated soils,

such as swamps, marshes, bogs and wetlands intentionally created to mitigate the conversion of wetlands.

- <u>Fish and Wildlife Habitat Conservation Areas</u> areas designated by the Washington State Department of Fish and Wildlife as priority habitats and species areas, areas designated by the City of Seattle as habitat for species of local importance, and corridors connecting priority habitats and species areas or habitat areas for species of local importance, when certain criteria are met.
- <u>Riparian Corridors</u> riparian watercourses (all streams, Haller Lake and Bitter Lake) and riparian management areas (the land within 100 feet of a riparian watercourse).
- <u>Abandoned Landfills</u> abandoned solid waste landfills as identified by the Seattle-King County Health Department, additional sites identified by public or historical research, and areas within 1,000-feet of methane-producing landfills.

Table 3.2-1 provides a summary of potential ECAs at BEX VI Capital Levy Program potential project sites as identified by the City of Seattle's Department of Construction and Inspections (SDCI) GIS mapping tools (City of Seattle, 2024). It should be noted that in some instances, steeps slopes that have been identified as ECAs by SDCI have actually been the product of previous man-made development activities. In any event, site specific analysis would be required at the time of project-specific design and environmental review to identify the existence and extent of any potential ECAs on a given site.

Table 3.2-1
City of Seattle ECAs at Potential BEX VI Program Project Sites

| SPS Site Location | City of Seattle ECAs |
|---|--|
| Replacement School or New Building at New Site Projects | |
| Bailey Gatzert ES | None |
| Sacajawea ES | Wetland, Steep Slopes |
| | Adjacent Offsite ECAs: Riparian Corridor |
| Whitman MS | Steep Slope |
| Seattle World School (T.T Minor School) | None |
| Modernization or Addition Projects | |
| Lowell ES | Steep Slopes |
| STEM K-8 at Louisa Boren | Steep Slope |
| | Adjacent Offsite ECAs: Wetland, Riparian Corridor, Liquefaction-Prone Area, Flood-Prone Area, Known Slide Area, and Wildlife Habitat |

| SPS Site Location | City of Seattle ECAs |
|----------------------------------|---|
| Aki Kurose MS | None |
| Franklin HS | Steep Slopes, Liquefaction-Prone Area |
| Chief Sealth International HS | Steep Slopes |
| | Adjacent Offsite ECAs: Wetland, Riparian Corridor |
| West Seattle HS | None |
| Interagency HS (Columbia School) | Liquefaction-Prone Area, Abandoned Landfill Hazard |
| Interagency HS (Roxhill Site) | Liquefaction-Prone Area, Peat-Settlement-Prone Area |
| Van Asselt Interim Site | None |
| | Adjacent Offsite ECAs: Steep Slopes |
| John Marshall Interim Site | Liquefaction-Prone Area |
| Athletic Fields Projects | |
| Salmon Bay K-8 | None |
| Eckstein MS | Steep Slopes |
| Franklin HS | Steep Slopes, Liquefaction-Prone Area |
| Whitman MS | Steep Slopes |
| Robert Eagle Staff MS | Riparian Corridor, Liquefaction-Prone Area |
| Denny MS/Chief Sealth HS | Steep Slopes |
| Athletic Fields | Adjacent Offsite ECAs: Liquefaction-Prone Area, Peat- Settlement-Prone Area |
| Roosevelt HS | Steep Slopes |
| Van Asselt Interim Site | None |
| | Adjacent Offsite ECAs: Steep Slopes |
| Lighting Projects | |
| Eckstein MS | Steep Slopes |
| Jane Addams MS | None |
| | Adjacent Offsite ECAs: Riparian Corridor, Liquefaction- Prone Area, Flood-Prone Area |
| Ingraham HS | Steep Slopes |
| Chief Sealth HS Athletic Fields | Steep Slopes |
| | Adjacent Offsite ECAs: Liquefaction-Prone Area, Peat- Settlement-Prone Area |
| Ballard HS | Steep Slopes |

| SPS Site Location | City of Seattle ECAs |
|---|--|
| Play Area Surface Conversion Projects | |
| Leschi ES | Steep Slopes |
| | Adjacent Offsite ECAs: Potential Slide Area |
| Genesee Hill ES | Steep Slopes |
| Bryant ES | None |
| Gatewood ES | Steep Slopes |
| Concord ES | Steep Slopes |
| | Adjacent Offsite ECAs: Liquefaction-Prone Area |
| Site Improvement Projects | |
| Arbor Heights ES | Steep Slopes |
| Wedgewood ES | None |
| Stevens ES | Steep Slopes |
| | Adjacent Offsite ECAs: Riparian Corridor, Wildlife Habitat |
| Dearborn Park ES | Steep Slopes, Wetland, Wildlife Habitat, Liquefaction- Prone Area |
| STEM K-8 at Louisa Boren | Steep Slope |
| | Adjacent Offsite ECAs: Wetland, Riparian Corridor, Liquefaction-Prone Area, Flood-Prone Area, Known Slide Area, and Wildlife Habitat |
| Madison MS | Steep Slopes |
| Cascade Parent Partnership (at North Queen Anne School) | Steep Slopes, Potential Slide Area |
| Nathan Hale HS | Riparian Corridor, Wetland, Liquefaction-Prone Area, Flood-Prone Area |

Source: City of Seattle, 2024.

3.2.2 Impacts of the Alternatives

This section of the FPEIS identifies how the potential projects in the BEX VI Capital Levy Program under the EIS Alternatives would relate to trees and environmentally critical areas during construction and long-term operations.

Alternative 1 - No Action Alternative

Under Alternative 1 – No Action Alternative, the BEX VI Capital Levy Program would not move forward, and no construction activities or associated impacts to trees or environmentally critical areas would occur. To the extent that increased enrollment may

occur, since public schools are obligated by law to accommodate additional students, and if portable classroom buildings are required at certain site locations, the installation of those buildings could require tree removal or be located on or adjacent to ECAs. To the extent feasible, portable classroom building siting plans would be designed to minimize these potential siting issues.

If the placement of new portables were to increase the amount of impervious surface on a site, the amount of surface water runoff to wetlands and riparian corridors could increase slightly. If necessary, stormwater management system upgrades could be provided for the placement of new portables as required by the City of Seattle Stormwater Manual (City of Seattle, 2021). Compliance with applicable stormwater management requirements would minimize the potential for impacts associated surface water runoff.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Alternative 2 includes a package of potential project types under the BEX VI Capital Levy Program that would be implemented at up to 42 sites around the District. These project types would include: major construction projects at up to 15 sites; athletic, playfield, and/or lighting improvements at up to 18 sites; and site improvements at up to 8 sites. The major construction projects could consist of school building replacements, new buildings at new sites, modernization and additions, building reconfigurations, and systems repair and replacement projects. The athletic facility and playfield improvements primarily would involve turf replacements, conversions to synthetic turf, and/or facility lighting installations and upgrades. This section analyzes the range of potential impacts that can result from each project type under Alternative 2. The analysis is presented at a planning level of detail consistent with a programmatic analysis. SPS will conduct appropriate project-level environmental analysis (including trees and ECAs) for each project when sufficient project-level details are available.

Construction Impacts

The following describes potential impacts to trees and environmentally critical areas that could occur during short-term construction of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement School and New Buildings at New Site Projects

Construction activities associated with replacement schools and new buildings at new sites projects could require the removal of existing trees, particularly if the new building has a larger footprint or is located in a different area of the site than the existing building. As part of project-specific environmental review, each project would conduct a tree inventory and assessment to identify all trees within the project area and determine any potential impacts to trees that would be associated with project-specific construction activities. Any Tier 1 and Tier 2 trees would be retained to the maximum extent feasible. All tree removal and replacement associated with project-specific construction would comply with the City of Seattle's Tree Ordinance (SMC 25.11.090).

As noted in **Table 3.2-1**, the potential BEX VI Capital Levy Program under Alternative 2 includes project sites for replacement schools or new buildings at new site projects that contain documented ECAs by the City of Seattle that are located on or in the immediate vicinity of the sites. Sites with ECAs include Sacajawea ES, STEM K-8 at Louisa Boren, and Whitman MS. Demolition of existing buildings and the construction of replacement schools or new buildings at new sites could occur in the vicinity of steep slopes, liquefaction-prone areas, known slide areas, flood-prone areas, wetlands, riparian corridors, and wildlife habitat areas. Additional environmentally critical areas could also exist at these and other SPS facilities locations and would be identified during project-specific environmental review. Any construction activities that could occur within ECAs or their buffers would comply with the requirements of the City of Seattle's Critical Areas Ordinance (SMC 25.09).

For project-specific development on sites under Alternative 2 that have steep slopes, liquefaction-prone areas or known-slide area ECAs (e.g., Sacajawea ES, K-8, STEM K-8 at Louisa Boren, and Whitman MS), site-specific geotechnical considerations may be necessary depending on the location of potential development. Site clearing and grading during construction activities would expose onsite soils and increase the potential for erosion. The implementation of construction BMPs, including a temporary erosion and sedimentation control (TESC) plan would help to minimize erosion during construction. However, it should be noted that in some instances, steeps slopes that have been identified as ECAs by SDCI have actually been the product of previous man-made development activities. Site specific analysis would be required at the time of project-specific design and environmental review to identify the existence and extent of any potential ECAs on a given site.

Construction for replacement schools or new buildings on new site projects under Alternative 2 that are in proximity to wetlands, riparian corridors or wildlife habitat ECAs (e.g., Sacajawea ES and STEM K-8 at Louisa Boren) would be designed to avoid those ECAs and their buffers to the extent feasible. Potential construction activities on those sites could affect those ECAs by increasing stormwater runoff and sedimentation during construction. As noted above, implementation of BMPs including a TESC plan would help to minimize sedimentation and control stormwater during construction. Excavation activities during construction could also require dewatering if a project site is located in an area with high groundwater levels. Completion of a site-specific geotechnical review for project-specific development would identify methods and measures for dewatering, if necessary.

Construction activities under Alternative 2 could also disturb wildlife through construction noise and human activities, and by removing existing vegetation on project-specific sites. Since the replacement school projects and new building on new site projects are located on previously developed sites in an urban area, it is anticipated that wildlife is generally accustomed to urban levels of noise. Potential design for replacement schools and new building on new site projects would also be anticipated to include new landscaping (including replacement trees as applicable and discussed above) in accordance with City of Seattle requirements to minimize the effects of vegetation removal.

The project-specific design for potential replacement schools and new building on new site projects would be anticipated to avoid ECAs and their buffers to the maximum extent possible. Any potential development or construction activities would comply with the City of Seattle's ECA Code (SMC 25.09). ECAs may be located on other sites that could be proposed for replacement schools or new building on new site projects. Any potential ECAs would be identified as part of project-specific environmental review and project-specific design and development would comply with the City's ECA Code.

Modernization and Addition Projects

Under Alternative 2, construction for building modernization projects is not anticipated to require the removal of any trees or require work within ECAs or their buffers since construction for these types of projects would generally occur within the existing building footprints.

Construction activities associated with building addition projects under Alternative 2 could require the removal of existing trees. As part of project-specific environmental review, each project would conduct a tree inventory and assessment to identify all trees within the project area and determine any potential impacts to trees that would be associated with project-specific construction activities. Any Tier 1 and Tier 2 trees on specific project sites would be retained to the extent feasible. All tree removal and replacement associated with project-specific construction would comply with the City of Seattle's Tree Ordinance (SMC 25.11.090).

Potential building addition project sites under the BEX VI Capital Levy Program contain or are located in the vicinity of ECAs. As noted in **Table 3.2-1**, several of these potential project sites contain or are in the vicinity of ECAs such as steep slopes, liquefaction-prone areas, peat-settlement-prone areas, abandoned landfill hazard areas, known-slide areas, wetlands, riparian corridors, and wildlife habitat areas (e.g., Lowell ES, STEM K-8 at Louisa Boren, Franklin HS, Chief Sealth International HS, Interagency HS (Columbia School), Interagency HS (Roxhill Site), Van Asselt Interim Site, and John Marshall Interim Site). Construction of addition projects could result in similar types of impacts as those identified for school replacements projects, albeit at a lower level due to the lower amount of building development and construction activities. The project-specific design for potential addition projects would be anticipated to avoid ECAs and their buffers to the maximum extent possible. Any potential development or construction activities for building addition projects under Alternative 2 would comply with the City of Seattle's ECA Code (SMC 25.09).

Building Reconfiguration Projects

Construction associated with building reconfiguration projects is not anticipated to require the removal of any trees or require work within ECAs or their buffers since construction for these types of projects would generally occur within the existing building footprints.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Athletic field and play area improvement projects under Alternative 2 would primarily consist of installation or replacement of synthetic turf within the existing field and play areas and

would therefore have a low likelihood to affect trees or ECAs. Some field improvements, including lighting projects, could include work within ECA buffers; however, the location of these improvements would avoid ECAs and their buffers to the maximum extent possible.

Constructions activities for athletic fields, play areas, site improvements and lighting projects would have the potential to expose soils during the construction process which would increase the potential for soil erosion and affect ECAs on potential project sites. Implementation of construction Best Management Practices (BMPs) would minimize the potential for erosion. Construction activities and associated noise could also temporarily disturb wildlife adjacent to potential project sites, particularly Robert Eagle Staff MS, Chief Sealth International HS, Jane Addams MS, STEM K-8 at Louisa Boren, Stevens ES, Dearborn Park ES and Nathan Hale HS which all contain or are located adjacent to riparian corridor or wildlife habitat ECAs. Since these projects would occur in existing school sites that are already developed it is anticipated that wildlife in the site vicinity would be used to noise levels of an urban environment. If any construction activity would occur within an ECA or its buffer, the proposed project would comply with the City of Seattle's ECA regulations (SMC 25.09).

System Repair and Maintenance Projects

Construction of system repair and maintenance projects is not anticipated to require the removal of any trees or require work within ECAs or their buffers since construction for these types of projects would generally occur within the existing buildings.

Operation Impacts

The following describes potential impacts to trees and environmentally critical areas that could occur with the operation of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement School and New Buildings and New Site Projects

Operation of replacement schools and new buildings on new site projects under Alternative 2 could result in an increase in impervious surfaces on individual project sites. An increase in impervious surface could potentially increase the amount of surface water runoff to wetlands or riparian corridors located on or adjacent to Sacajawea ES and STEM K-8 at Louisa Boren. However, project-specific design for replacement schools and new buildings on new site projects would include design of a stormwater management system as required by the City of Seattle Stormwater Manual (City of Seattle, 2021). Compliance with applicable stormwater management requirements would minimize the potential for impacts associated surface water runoff.

Operation of replacement schools and new buildings could also result in increased noise associated with potentially larger buildings and increased student capacity. Additional noise could disturb wildlife in and around the potential project sites, particularly those sites that contain or are located near riparian corridors or wildlife habitat areas (e.g., Sacajawea ES and STEM K-8 at Louisa Boren). However, wildlife in these areas is generally accustomed to urban noise levels and lighting from existing school facilities and surrounding development.

Modernization and Addition Projects

Operational impacts associated with modernization and addition projects are anticipated to be similar to or less than those described for replacement school and new buildings at new site projects, due to the lower amount of development that would be proposed for those types of projects. Modernization projects would generally take place within the footprint of the existing building and would not result in increases in impervious surface and surface water runoff. Potential building addition projects at Chief Sealth International HS and STEM K-8 at Louisa Boren would likely result in some increase in the overall building footprint on a potential project site and a potential increase in impervious surface and surface water runoff that could be located in proximity to offsite wetlands or riparian corridors. As noted above, compliance with applicable stormwater management requirements would minimize the potential for impacts associated surface water runoff.

Increased noise could also occur if the potential building addition projects result in increased capacity at the schools. However, the increase in noise would likely be less than replacement schools and wildlife in the areas surrounding the site are generally used to urban noise levels.

Building Reconfiguration Projects

Building reconfiguration projects under Alternative 2 would occur within existing facilities to better accommodate SPS program elements or changes to student needs. These projects would not be anticipated to result in operational impacts to trees or environmentally critical areas.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Athletic field, play area and lighting projects under Alternative 2 could result in increased usage of SPS recreation facilities and generate additional noise on the project sites. Potential lighting projects would be designed to minimize light spillage in accordance with City of Seattle regulations and design standards. ECAs on and in the vicinity of potential lighting projects are primarily geologic hazard ECAs which would not be affected by potential lighting projects. Jane Addams MS is located in the vicinity of riparian corridor ECAs; however, these ECAs are located approximately over 300 feet from the campus and are not likely to be affected by potential lighting, particularly with the implementation of measures to minimize light spillage (see Section 3.6, Aesthetics/Light & Glare for further details on lighting).

Wildlife in the areas surrounding the potential project sites could be affected by increased noise associated with athletic field and play are use, but such species are likely to be used to the current, urban levels of noise (including the school and existing athletic field/play areas).

System Repair and Maintenance Projects

System repair and maintenance projects under Alternative 2 would occur within the existing footprint of SPS facilities and would not be anticipated to result in operational impacts to trees or environmentally critical areas.

Cumulative Impacts

Construction associated with potential projects under the BEX VI Capital Levy Program could result in cumulative construction-related impacts in the City of Seattle, particularly in areas where there are other major construction projects. This could result in the potential for cumulative impacts to trees and cumulative increases in noise and stormwater runoff for ECAs. However, given the urban nature of the City of Seattle and that potential projects under the BEX VI Program would comply with the City's Tree Ordinance and ECA code, significant impacts to trees and ECAs from cumulative development would not be anticipated.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Under Alternative 3, SPS would implement a modified selection of potential projects identified for the BEX VI Capital Levy Program. Most notably when compared to Alternative 2, Alternative 3 does not include any replacement school projects or new buildings at new site projects but does include two additional modernization and addition projects (Bailey Gatzert ES and the Skills Center). See Table 2-2 for a summary of projects assumed for Alternative 3 and a comparison to those identified for Alternative 2.

Construction Impacts

Under Alternative 3, no school replacement projects or new buildings on new site projects are identified. Therefore, construction-related impacts to trees and ECAs that could be associated with those types of projects would not occur when compared to Alternative 2. Construction-related impacts to trees and ECAs from modernization and addition projects would be anticipated to be similar to Alternative 2; however, Alternative 3 assumes that two additional modernization/addition projects at Bailey Gatzert ES and the Skills Center would occur. These assumptions for Alternative 3 would result in additional impacts from modernization and addition projects when compared to Alternative 2, but such impacts at Bailey Gatzert ES and the Skills Center would be anticipated to be lower than what could occur with the replacement projects for those sites that are identified under Alternative 2.

Construction-related impacts to trees and ECAs from building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects would be the same as described for Alternative 2.

Operation Impacts

The BEX VI Capital Levy Program under Alternative 3 would result in similar types of operational impacts to trees and ECAs as those identified for Alternative 2; however, the level of operation-related impacts would be lower since there would be no school replacement projects under Alternative 3.

Operational impacts would also be the same as Alternative 2 for building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects.

Cumulative Impacts

Similar to Alternative 2, construction associated with potential projects under Alternative 3 could result in cumulative construction-related impacts in the City of Seattle, particularly in areas where there are other major construction projects. This could result in the potential for cumulative impacts to trees and cumulative increases in noise and stormwater runoff for ECAs. It would be anticipated that the types of potential cumulative impacts would be similar, but the level of impacts would be lower under Alternative 3 since lower levels of development are identified. Given the urban nature of the City of Seattle and that potential projects under the BEX VI Capital Levy Program would comply with the City's Tree Ordinance and ECA code, significant impacts to trees and ECAs from cumulative development would not be anticipated.

3.2.3 Mitigation Measures

The following mitigation measures have been identified to further reduce the potential for impacts to trees and ECAs associated with the potential BEX VI Capital Levy Program under the EIS Alternatives:

Construction

- A tree survey and inventory report would be completed by a licensed arborist, as appropriate, as part of the project-specific design for potential projects under the BEX VI Capital Levy Program. The report would identify and classify trees on a potential project site and identify trees to be retained and trees to be removed. All tree removal and replacement associated with project-specific construction would comply with the City of Seattle's Tree Ordinance (SMC 25.11.090).
- ECAs and their buffers would be identified on sites as part of the project-specific design for potential projects and would be avoided to the extent feasible. Projectspecific design and development would comply with the City's ECA regulations (SMC 25.09).

- Construction activities for specific projects would comply with the City of Seattle's ECA regulations (SMC 25.09), as applicable. Implementation of BMPs including a TESC plan would help to minimize sedimentation and control stormwater runoff to ECAs and their buffer areas.
- Site specific geotechnical recommendations would be provided as individual projects are proposed. Measures would be identified as necessary as part of code compliance, based on the specific conditions at the individual project sites.
- All project-specific earthwork and site preparation on potential BEX VI Capital Levy Program sites would be conducted in compliance with relevant grading criteria of the Seattle Municipal Code (Sections 22.170 and 22.802).

Operation

- Project-specific design would include design of a stormwater management system
 for individual site development as necessary. Potential stormwater management
 systems would meet the requirements of the City of Seattle Stormwater Manual (City
 of Seattle, 2021). Compliance with applicable stormwater management requirements
 would minimize the potential for impacts associated surface water runoff.
- As part of project-specific design, potential lighting projects would be designed to minimize light spillage in accordance with City of Seattle regulations and design standards.

3.2.4 Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse impacts to trees or ECAs are anticipated to result from implementation of the BEX VI Capital Levy Program under the EIS Alternatives. Appropriate project level environmental review would be prepared for individual projects included in the BEX VI Capital Levy Program, and site-specific information about the significance of potential impacts would be further assessed at that time. With appropriate mitigation for each site, no significant adverse impacts to trees or ECAs are anticipated.

3.3 ENERGY

This section of the Final Programmatic EIS (FPEIS) describes the existing energy conditions and energy policies for SPS and evaluates the potential impacts that could occur as a result of the potential BEX VI Capital Levy Program. SPS will conduct phased environmental review for projects under the BEX VI Capital Levy Program. Project-specific environmental review will be completed, as appropriate, for individual projects when the District begins project-specific planning, design and construction activities.

3.3.1 Affected Environment

Existing Conditions

In 2005, the State of Washington instituted Executive Order 05-01 which established sustainability and efficiency goals for state operations. As part of this Executive Order, public school construction projects that receive state funding assistance must be built to the standards established by the Washington Sustainable Schools Protocol (WSSP). As required by RCW 39.35, state-funded public school construction projects, greater than 5,000 sq. ft. are required to incorporate high-performance features into their design and construction through either the use of WSSP or LEED for Building Design and Construction (Schools). WSSP serves as the green building guide for new and modernization school construction in the State of Washington and provides criteria and standards for design and construction, including energy efficiency.

In 2019, Washington State House Bill (HB) 1257 was signed into law which mandated the development of the Clean Building Performance Standards (CBPS) that set energy efficiency targets for commercial buildings. The standard requires building owners to demonstrate compliance with the energy use intensity targets based on building size beginning in 2026 with the goal of increasing energy efficiency from building uses and maximizing reductions of greenhouse gas emissions from the building sector.

In addition, the City of Seattle recently adopted the Building Emissions Performance Standards in December 2023 that set interim targets for GHG emissions reductions for buildings with a target to reach an almost 40 percent reduction in emissions in the buildings sector by 2030 and to be net-zero carbon emissions by 2050. These standards also create building performance standard energy targets to improve energy efficiency in new and existing buildings over time. The Building Emissions Performance Standards apply to existing commercial and multifamily buildings that are larger than 20,000 sq. ft. (City of Seattle, 2024).

SPS adopted its own Natural Resource Conservation Policy and Natural Resource Conservation Procedures in 2006 with the goal to create and maintain sustainable, healthy school environments through long-term resource management planning. As part of that planning, SPS would model environmental stewardship by instituting a resource conservation management plan for the following:

3.3-1

- Reduce the use of energy, water, and other natural resources, and encourage recycling.
- Educate students, teachers and staff about the importance of conserving natural resources.
- Lessen environmental damage attributable to natural resource consumption.

In 2012, SPS adopted policy 6901 for capital levy planning that states that the Board strives to reduce District operating costs and carbon emissions by utilizing project designs that provide conservation opportunities and minimize negative impacts on the environment. In 2021, the School Board further approved Board Resolution 2020-21-18 which committed SPS to transition to 100 percent clean, renewable energy with the goal of improving student health and the creation of more sustainable and equitable communities. The resolution also called for the development of a Clean Energy Task Force. The task force convened in 2022 and made recommendations for how to meet the goals of Resolution 2020-21-18 in the Seattle Public Schools Clean Energy Plan.

The most recent School Board Policy on natural resources conservation (No. 6810) was adopted in 2017 but did not change any of the policy language from 2006. Updated procedures to implement Policy No. 6810 were most recently approved in 2022 (Superintendent Procedure 6810SP) and serves as the long-term resource management plan for the District. Procedure 6810SP provides guidance for SPS facilities operations to reduce natural resource consumption including conservation and more efficient use of energy. It includes guidance for heating, cooling and ventilation (HVAC) and mechanical equipment operations; indoor and outdoor lighting standards and operations; and design standards and procedures for new building construction and remodels (Seattle Public Schools, 2022).

3.3.2 Impacts of the Alternatives

This section of the FPEIS identifies how the potential BEX VI Capital Levy Program under the EIS Alternatives would relate to energy resources during construction and long-term operations.

Alternative 1 - No Action Alternative

Under Alternative 1 – No Action Alternative, the potential BEX VI Capital Levy Program would not move forward, and no construction activities or associated construction-related energy usage would occur at SPS project sites. Existing buildings would remain, no new facilities would be provided that would have enhanced energy efficiency features, and no improvements would be made to provide increased energy efficiency in existing retained buildings. To the extent that increased enrollment may occur, since public schools are obligated by law to accommodate additional students, portable classroom buildings could be required at certain site locations. The installation of those buildings would result in some level of construction-related energy use, including electricity and gas for construction vehicles and equipment. However, the amount of energy for the installation of portable

3.3-2

classroom buildings would be anticipated to be small and temporary and therefore, it is anticipated that the No Action Alternative would not result in any significant, unavoidable adverse energy impacts.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Alternative 2 includes a package of project types under the potential BEX VI Capital Levy Program that would be implemented at up to 42 sites around the District. These project types would include: major construction projects at up to 15 sites; athletic, playfield, and/or lighting improvements at up to 18 sites; and site improvements at up to 8 sites. The major construction projects could consist of school building replacements, new buildings at new sites, modernization and additions, building reconfigurations, and systems repair and replacement projects. The athletic facility and playfield improvements primarily would involve turf replacements, conversions to synthetic turf, and/or facility lighting installations and upgrades. This section analyzes the range of potential impacts that can result from each project type under Alternative 2. The analysis is presented at a planning level of detail consistent with a programmatic analysis. SPS will conduct appropriate project-level environmental analysis (including energy) for each project when sufficient project-level details are available.

Construction Impacts

The following describes potential energy impacts that could occur during short-term construction of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement Schools and New Buildings at New Site Projects

Under Alternative 2, temporary construction activities for replacement schools and new buildings at new site projects would result in the use of energy for construction vehicles, equipment and other construction-related operations. Fuel would be utilized by construction vehicles and equipment during project-specific development. Electricity would be utilized for construction equipment and site lighting (as necessary).

Construction activities would also result in increased vehicle trips associated with construction workers traveling to and from the site. These additional construction-related vehicle trips would require consumption of fuel for vehicle travel.

Modernization and Addition Projects

Construction of modernization and addition projects under Alternative 2 would result in similar types of energy use as school replacement projects (e.g., fuel and electricity consumption for construction vehicles, equipment and other activities); however, such energy use would likely be lower due to the lower amount of construction-related activity that would be necessary for modernization and addition projects.

Building Reconfiguration Projects

Construction-related energy use for building reconfiguration projects would be anticipated to be similar to or less than the usage identified with modernization and addition projects discussed above.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Construction of athletic field, play area, site improvement and lighting projects would result in similar types of impacts as school replacement projects (e.g., fuel and electricity consumption for construction vehicles, equipment and other activities). However, the amount of energy use would likely be lower due to the lower amount of construction-related activity that would be necessary for these types of projects.

System Repair and Maintenance Projects

Construction-related energy use for system repair and maintenance projects would be less than those impacts associated with replacement building projects and modernization and addition projects discussed above.

Operation Impacts

The following describes potential energy impacts that could occur with the operation of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement School and New Buildings and New Site Projects

Operation of replacement schools and new buildings at new site projects under Alternative 2 would require energy, primarily electricity, to operate the new buildings. To meet Board, City and State goals new buildings will be all electric. As indicated above, major construction projects such as replacement schools and new buildings would be required to meet the State of Washington's Clean Building Performance Standards and be designed in accordance with WSSP which serves as the green building guide for new and modernization school construction in the State of Washington and provides criteria and standards for design and construction, including energy efficiency. SPS buildings would also be subject to the City's new Building Emissions Performance Standards energy targets to provide enhanced energy efficiency.

Replacement schools and new building operations would continue to follow the most recent SPS Natural Resources Conservation Policy (No. 6810) and the updated procedures to implement Policy No. 6810 (Superintendent Procedure 6810SP) to provide guidance for SPS facilities operations to reduce natural resource consumption including conservation and more efficient use of energy. With the design in accordance with Washington State CBPS and WSSP criteria, as well as continued implementation of SPS Natural Resource Conservation Policies and Procedures, it is anticipated that replacement school buildings and new buildings on new site projects would have a high level of energy efficiency which would reduce energy use, particularly when compared to the existing, older facilities that they would be replacing.

3.3-4

Modernization and Addition Projects

As described above, building addition projects under Alternative 2 would create new energy uses at their project locations. These projects will be required to meet the Washington State CBPS and per SPS policies and procedures would be required to be designed in accordance with WSSP which includes criteria and design standards for energy efficiency. With adherence to the Washington State CBPS, WSSP standards and criteria and Seattle Building Emissions Performance Standards, it is anticipated that potential building additions would have a higher level of energy efficiency than the retained buildings that would remain on those project sites.

Potential modernization projects under Alternative 2 would not be anticipated to create new building space that could generate additional energy use. However, in some cases, modernization projects could include energy efficiency measures that would reduce energy use in those specific buildings.

Building Reconfiguration Projects

Building reconfiguration projects would be implemented in existing facilities to better accommodate SPS program elements or changes to student needs. These projects would not be anticipated to create new energy uses within the existing buildings.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Athletic field, play area and site improvement projects under Alternative 2 would not be anticipated to generate an increased demand for energy use on their specific sites. Potential lighting projects would require electricity and create additional energy use at their respective site locations. Consistent with recent SPS field lighting projects, LED lighting fixtures could be utilized which would be more efficient and conserve energy when compared to traditional metal halide light fixtures. Field lighting systems could also be connected to a fully programmable control system to allow lights to be turned off when the field is not in use.

System Repair and Maintenance Projects

System repair and maintenance projects under Alternative 2 would not be anticipated to create new energy uses at existing schools but could include energy efficiency improvements on a project-specific basis that would reduce energy use in those specific buildings.

Cumulative Impacts

Potential projects under the BEX VI Capital Levy Program could result in cumulative increase in energy usage in the City, particularly in areas where other major development projects are occurring. Construction associated with the potential BEX VI Capital Levy Program could add to the cumulative energy use associated with other major construction projects. However, since SPS would continue to comply with their Natural Resource Conservation Policies and Procedures (Superintendent Procedure 6810SP) and would design major construction projects to be consistent with the Washington State CBPS and

WSSP criteria and standard it is anticipated that cumulative energy impacts would be limited.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Construction Impacts

Under Alternative 3, no school replacement projects or new buildings on new site projects are identified and as such construction-related energy use associated with those types of projects would not occur when compared to Alternative 2. Construction-related energy use for modernization and addition projects would be anticipated to be similar to Alternative 2; however, Alternative 3 potentially includes two additional modernization/addition projects at Bailey Gatzert ES and the Skills Center. These assumptions for Alternative 3 would result in additional impacts from modernization and addition projects when compared to Alternative 2, but such impacts at Bailey Gatzert ES and the Skills Center would be anticipated to be lower than what could occur with the replacement projects for those sites that are identified under Alternative 2.

Construction-related energy use for building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects would be the same as Alternative 2.

Operation Impacts

The potential BEX VI Capital Levy Program under Alternative 3 would result in similar types of operational energy use as identified for Alternative 2. However, since there would be no replacement school projects under Alternative 3, it is anticipated that the potential school buildings that would be retained in place under this alternative (e.g., Bailey Gatzert ES, Sacajawea ES, Whitman MS, and Seattle World School HS (Gym)) would be less energy efficient and require more energy to operate than a new, replacement building that would be anticipated under Alternative 2.

Operational energy use under Alternative 3 for building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects would be the same as described for Alternative 2.

Cumulative Impacts

Potential projects under Alternative 3 could result in cumulative increase in energy usage in the City, similar to what was described for Alternative 2. Construction associated with the potential projects under Alternative 3 could add to the cumulative energy use associated with other major construction projects but would be anticipated to be less than Alternative 2 due to lower amounts of development. Since SPS would continue to comply with their Natural Resource Conservation Policies and Procedures (Superintendent Procedure 6810SP) and would design major construction projects to be consistent with the Washington

State CBPS and WSSP criteria and standards, it is anticipated that cumulative energy impacts would be limited.

3.3.3 Mitigation Measures

The following measures have been identified to further reduce the potential for energy impacts associated with the potential BEX VI Capital Levy Program under the EIS Alternatives:

Construction

- New building development would comply with applicable energy codes, including the City of Seattle Energy Code (SMC 22.700).
- New building development would comply with the Washington State Clean Building Performance Standard.
- Consistent with SPS policies and procedures, applicable potential development projects would be designed in accordance with the Washington Sustainable Schools Protocol (WSSP) which serves as the green building guide for new and modernization school construction in the State of Washington and provides criteria and standards for design and construction, including energy efficiency measures.
- As applicable, a Construction Management Plan would be prepared for each individual construction project. These measures are intended to, among other things, minimize traffic delays and associated vehicle idling which would reduce fuel consumption during the construction process.

Operation

- All SPS buildings are required to meet the Washington State CBPS. Improvements
 in district buildings that meet these standards would improve the energy efficiency of
 district buildings.
- Operations for SPS buildings would be required to comply with the City of Seattle's Building Emissions Performance Standards.
- SPS would continue to follow the most recent SPS Natural Resources Conservation Policy (No. 6810) and the updated procedures to implement Policy No. 6810 (Superintendent Procedure 6810SP) to provide guidance for SPS facilities operations and reduce natural resource consumption including conservation and more efficient use of energy.

- Consistent with recent SPS field lighting projects, LED lighting fixtures would be utilized which would be more efficient and conserve energy when compared to traditional existing metal halide light fixtures.
- Consistent with recent SPS field lighting projects, field lighting systems would be connected to a fully programmable control system to allow the lighting system to be scheduled for operation when needed and to be turned off when the field is not in use.

3.3.4 Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse energy impacts are anticipated to result from implementation of the potential BEX VI Capital Levy Program under the EIS Alternatives. Appropriate project level environmental review would be prepared for individual projects included in the BEX VI Capital Levy Program, and site-specific information about the significance of potential impacts would be further assessed at that time. With appropriate mitigation for each site, no significant adverse energy impacts are anticipated.

3.4 NOISE

This section of the Final Programmatic EIS (FPEIS) describes the existing noise conditions at SPS facility sites, describes existing noise regulations, and evaluates the potential impacts that could occur as a result of the BEX VI Capital Levy Program. SPS will conduct phased environmental review for potential projects under the BEX VI Capital Levy Program. Project-specific environmental review will be completed, as appropriate, for individual projects when the District begins project-specific planning, design and construction activities.

3.4.1 Affected Environment

Existing Conditions

Noise is defined as any sound that is undesirable because of speech and hearing interference or annoyance. The intensity, duration, and character of sounds can have an adverse effect on personal health and welfare. While one of the more serious consequences of noise is hearing loss, other significant effects include interference with sleep, disruption of conversation, and effect on work performance.

Sound level descriptors are ways of measuring and describing noise, including factors that account for sound duration, magnitude, frequency and pitch. Sound is measured in decibels (dB), a logarithmic ratio between pressures caused by a given sound spectrum. Environmental noise is measured as "A-weighted" sound level in decibels, symbolized as dBA. The A-weighted scale represents noise using the scale corresponding the most closely to the range and characteristics of the human ear. Equivalent sound level, shown as Leq, is a common descriptor for measuring fluctuating sounds. The Leq is the level of a constant sound that, over a given time period, contains the same amount of sound energy as the measured fluctuating sound. People commonly experience sound levels in the range of between 5 to 90 dBA.

Ambient noise is regulated by the City of Seattle under the City's Noise Ordinance (Seattle Municipal Code, Chapter 25.08). The Noise Ordinance adopts restrictions contained in Washington State's Maximum Environmental Noise Levels (WAC 173-60). City of Seattle maximum permissible sound levels are shown in **Table 3.4-1**. These sound level limits are reduced by 10 dBA where the receiving property is a residential use between 10:00 PM and 7:00 AM on weekdays and 10:00 PM and 9:00 AM on weekends and holidays (SMC 25.08.420).

Table 3.4-1
CITY OF SEATTLE MAXIMUM PERMISSIBLE ENVIRONMENTAL SOUND LEVELS (dBA)

| Land Use of Noise Source | Receiving Land Use | | |
|-----------------------------|-----------------------|------------|------------|
| | Residential Day/Night | Commercial | Industrial |
| Residential | 55/45 | 57 | 60 |
| Commercial | 57/47 | 60 | 65 |
| Industrial | 60/50 | 65 | 70 |

Source: City of Seattle, 2024.

Sounds from school-related activities at SPS sites typically include: school bus drop-off and pickup; parent-vehicle drop-off and pickup; recess, physical education and athletics activities outside; school bells being rung throughout the weekday; and, athletic activities outside after school. Noise levels near a school may also be affected by changes in traffic patterns in the site vicinity. Existing noise levels associated with these types of activities are typically within the permissible sound limits or fall within the exemptions for daytime hours (e.g., temporary noise such as school bells not operating for more than five minutes of any one hour) (SMC 25.08.540).

The Seattle Land Use Code allows for construction activities and construction equipment operations between the hours of 7:00 AM and 10:00 PM on weekdays and 9:00 AM and 10:00 PM on weekends and holidays. However, it should be noted that SPS construction project activities generally occur between 7:00 AM and 5:00 PM on weekdays. Certain provisions of the Noise Ordinance, namely, SMC 25.08.425, also regulate construction-related noise in the City of Seattle and SPS follows those applicable provisions for construction noise and requires that all contractors understand and comply with those provisions.

Seattle's noise standards provide for temporary increases in the maximum permissible sound levels based on equipment type. During daytime hours¹, sound levels from construction equipment (e.g., tractors, dozers, loader, cranes, compactors, compressors, pneumatic equipment, etc.) are allowed a 25 dBA increase in the noise standards; portable powered equipment (e.g., chainsaws, powered hand tools, etc.) are allowed a 20 dBA increase and maintenance equipment (e.g., lawn mowers, powered hand tools, snow blowers, etc.) are allowed a 15 dBA increase. In addition, the Noise Ordinance authorizes noise from impact-type equipment (e.g., pile drivers, pavement breakers, jackhammers, etc.) to temporarily exceed the sound levels associated with other construction equipment up to a maximum of Leq 99 dBA for a period of $7\frac{1}{2}$ minutes. Sounds above a Leq of 99 dBA are prohibited unless a variance is obtained from the City of Seattle.

¹ Defined by Chapter 25.08 of the Seattle Code as 7 AM – 10 PM during weekdays and 9 AM – 10 PM on weekends.

3.4.2 Impacts of the Alternatives

This section of the FPEIS identifies how the potential BEX VI Capital Levy Program under the EIS Alternatives would relate to noise during construction and long-term operation of potential projects.

Alternative 1 – No Action Alternative

Under Alternative 1 – No Action Alternative, the BEX VI Capital Levy Program would not move forward, and no construction activities or associated construction-related noise would occur at SPS project sites. To the extent that increased enrollment may occur, since public schools are obligated by law to accommodate additional students, additional bus or parent vehicle trips could occur which would result in a minor increase in transportation-related noise; a minor increase in student-related noise (e.g., noise from additional students at recess or other outdoor activities during the school day) could also occur. If portable classroom buildings are required at certain site locations, the installation of those buildings could result in a small, temporary increase in construction-related noise while those portable buildings are installed on site. Since such increases would be small and/or temporary, it is anticipated that the No Action Alternative would not result in any significant, unavoidable adverse noise impacts.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Alternative 2 includes potential projects under the BEX VI Capital Levy Program that would be implemented at up to 42 sites around the District. These project types would include: major construction projects at up to 15 sites; athletic, playfield, and/or lighting improvements at up to 18 sites; and site improvements at up to 8 sites. The major construction projects could consist of school building replacements, new buildings at new sites, modernization and additions, building reconfigurations, and systems repair and replacement projects. The athletic facility and playfield improvements primarily would involve turf replacements, conversions to synthetic turf, and/or facility lighting installations and upgrades. This section analyzes the range of potential impacts that can result from each project type under Alternative 2. The analysis is presented at a planning level of detail consistent with a programmatic analysis. SPS will conduct appropriate project-level environmental analysis (including noise) for each project when sufficient project-level details are available.

Construction Impacts

The following describes potential noise impacts that could occur during short-term construction of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement Schools and New Buildings at New Site Projects

Under Alternative 2, replacement schools and new buildings at new site projects would result in temporary construction activities that would generate noise during the construction process. During construction, localized sound levels would temporarily increase in the vicinity of the project-specific sites and on streets used by construction vehicles accessing the construction areas. The increase in sound levels would depend upon the type of equipment being used, the duration of such use, and the proximity of the equipment to the property line. Typical construction equipment for replacement schools and new building generally includes jackhammers, dump trucks, back hoes, forklifts, trucks and other types of construction equipment. In the event that geothermal wells are included as part of potential replacement schools or new buildings at new site projects, it would also result in additional drilling activities that would generate temporary noise during the construction process.

Depending on the location and type of construction activity, construction noise would result in temporary annoyance and possible increased speech interference near the potential project sites. Existing residential land uses surrounding the potential project sites would be the most sensitive noise receptors and could experience occasional temporary noise-related impacts during the construction process. Potential projects under Alternative 2 would comply with the provisions of the City of Seattle's Noise Code (SMC 25.08) as it relates to construction-related noise to reduce temporary noise impacts during construction. Contractors are aware of the City of Seattle Noise Ordinance requirements and are contractually required by SPS to abide by those requirements.

Construction activities could also result in increased traffic from construction workers traveling to and from the site, as well as periodic traffic delays on streets adjacent to project sites. This increase in traffic would result in additional temporary transportation-related noise during the construction periods.

Modernization and Addition Projects

Construction of modernization and addition projects under Alternative 2 would result in similar types of construction-related noise as school replacement projects. However, these noise impacts would likely be lower due to the lower amount of construction-related activity that would be necessary for modernization and addition projects. In particular, construction activities for modernization projects would be located almost entirely within their existing buildings and would be anticipated to generate substantially less construction noise than replacement school projects.

Building Reconfiguration Projects

Construction-related noise impacts for building reconfiguration projects would be similar to or less than the impacts identified with modernization projects discussed above since construction activities would be located almost entirely within the existing buildings.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Construction of athletic field, play area, site improvement and lighting projects would result in similar types of noise impacts as school replacement projects; however, these noise impacts would likely be lower due to the lower amount of construction-related activity that would be necessary for these types of projects. Some level of grading and excavation would typically be necessary for these types of projects and would result in temporary noise, albeit at a lower level than school replacement projects.

System Repair and Maintenance Projects

Construction-related noise impacts for system repair and maintenance projects would be less than those impacts associated with modernization and addition projects discussed above.

Operation Impacts

The following describes potential noise impacts that could occur with the operation of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement School and New Buildings and New Site Projects

Operational noise associated with development under Alternative 2 would primarily be related to student-generated noise, building operational systems (e.g., mechanical systems, etc.) and traffic noise. While the existing facilities at replacement school sites would already generate these types of noise sources and levels, to the extent that replacement schools and new buildings result in increased student capacity on specific sites, it would result in an increase in student noise levels, particularly during student drop-off/pickup, recess and lunch periods. Residences that are proximate to each specific site may experience a slight increase in noise during those periods of the day. Building operational systems such as mechanical equipment could also generate noise; however, building systems would be designed to be compliant with City of Seattle requirements, including noise standards. Noise from replacement school and new building operations would not be anticipated to result in a significant impact.

Increased traffic volumes from potential projects would result in an increase in traffic-related noise. However, areas surrounding SPS sites are generally developed urban areas with existing traffic-related noise and the increase in traffic volumes associated with potential replacement schools and new buildings at new site projects is not anticipated to result in significant noise impacts.

Modernization and Addition Projects

Noise impacts associated with modernization and addition projects are anticipated to be similar to or less than those described for replacement school and new buildings at new site projects, due to the lower amount of development that would be proposed for those types of projects.

Building Reconfiguration Projects

Building reconfiguration projects would be implemented in existing facilities to better accommodate SPS program elements or changes to student needs. These projects would not be anticipated to result in operational noise impacts.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Operation of new athletic facility lighting at SPS sites would extend the available use of those facilities into the evening hours, particularly from late fall through the early spring. Athletic facilities including tennis courts and athletic fields, would be utilized for scholastic (e.g., school athletic practices and other events) and public use (community recreational athletic practices and other events) and would generally be lit during scheduled periods until typically 10:00 PM. Sports that would typically utilize the lighted facilities would include soccer, football, lacrosse, ultimate Frisbee, softball, baseball, tennis, and other similar activities.

Extended use of these athletic facilities with the addition of new lighting would generate noise which would likely be noticeable in the immediate vicinity of the project sites. Noise from these activities would generally include human voices and whistles from sports participants and cheering from spectators. It should be noted that SPS does not anticipate installing spectator stands at these facilities other than potentially small portable bleachers and as a result, spectator noise would likely be limited. In addition, most SPS athletic facilities are not equipped with public address speaker systems, and none would be included as part of the BEX VI Capital Levy Program. Portable amplification systems would also be prohibited during non-school related events and activities.

Noise levels that would be associated with use of the athletic facilities would be dependent on the type of activities and the existing noise levels in the vicinity of the sites. For example, noise associated with a recreational soccer game with a small number of spectators would likely generate a slightly higher level of noise than a scholastic soccer practice. Lighted athletic facilities would also generate additional vehicle traffic and associated noise.

Noise studies that have been previously conducted for recent project-specific SPS athletic field lighting projects, such as a recent athletic field lighting project at Van Asselt Interim School, have generally indicated that while noise levels would increase with athletic activities, such an increase in noise levels would not typically rise to the level of a significant noise impact. As noted previously, project-specific environmental review would be completed as these types of projects are proposed for implementation and would include a site-specific noise study as part of the review.

Other improvements at SPS athletic fields and play areas such as the installation of synthetic turf could also extend the use of those recreational facilities beyond what currently occurs. Properties that are adjacent to these recreation facilities could experience a slight increase in noise from additional use of the facilities, but such noise would not be anticipated to constitute a significant impact.

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System Repair and Maintenance Projects

System repair and maintenance projects under Alternative 2 would not be anticipated to result in operational noise impacts.

Cumulative Impacts

Construction associated with the potential projects under the BEX VI Capital Levy Program could result in cumulative construction impacts in the City, particularly in areas where other major construction projects are occurring. Construction associated with the BEX VI Capital Levy Program could add to the noise associated with other major construction projects. Some projects in the BEX VI Capital Levy Program could result in increased traffic in some neighborhoods, which could result in a cumulative increase in vehicle-related traffic noise. However, since the BEX VI Capital Levy Program would be phased over several years and would be distributed across the City, cumulative noise impacts are anticipated to be limited.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Construction Impacts

Under Alternative 3, no school replacement projects or new buildings on new site projects are identified and as such, construction-related noise associated with those types of projects would not occur when compared to Alternative 2. Construction-related noise for modernization and addition projects would be anticipated to be similar to Alternative 2; however, Alternative 3 potentially includes two additional modernization/addition projects at Bailey Gatzert ES and the Skills Center. These assumptions for Alternative 3 would result in additional impacts from modernization and addition projects when compared to Alternative 2, but such impacts at Bailey Gatzert ES and the Skills Center would be anticipated to be lower than what could occur with the replacement projects for those sites that are identified under Alternative 2.

Construction-related noise impacts for building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects would be the same as Alternative 2.

Operation Impacts

The potential BEX VI Capital Levy Program under Alternative 3 would result in similar types of operational noise impacts as those identified for Alternative 2 (e.g., student generated noise, building operational noise, and vehicle traffic noise); however, the level of operation-related noise impacts would be lower since there would be no school replacement projects under Alternative 3.

Operational noise impacts would be the same as Alternative 2 for building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects.

Cumulative Impacts

Construction associated with the potential projects under Alternative 3 could result in similar cumulative construction impacts in the City as Alternative 2 but at a lower level since no replacement school or new buildings on new site projects would be included. Some projects in the BEX VI Capital Levy Program could result in increased traffic in some neighborhoods, which could result in a cumulative increase in vehicle-related traffic noise. However, since the BEX VI Capital Levy Program would be phased over several years and would be distributed across the City, cumulative noise impacts are anticipated to be limited.

3.4.3 Mitigation Measures

The following mitigation measures have been identified to further reduce the potential for noise impacts associated with the potential BEX VI Capital Levy Program under the EIS Alternatives:

Construction

- Construction activities would comply with the City of Seattle Noise Ordinance (SMC 25.08.425) which allows for temporary increases in the maximum permissible sound levels based on equipment type and includes specific times of the day that construction activities can occur.
- As part of their construction contracts, SPS would continue to require that all
 contractors are aware of and comply with applicable local and state noise regulations
 during project-specific construction activities.
- As applicable, a Construction Management Plan would be prepared for individual
 construction projects to establish parking areas, construction staging areas, truck haul
 routes, and provisions for maintaining pedestrian and vehicle routes. These
 measures are intended to, among other things, minimize traffic delays, vehicle idling
 and associated noise.

Operation

 New athletic facility lighting projects under the BEX VI Capital Levy Program would undergo a site-specific noise analysis as part of future project-level environmental review and additional mitigation measures could be identified during that process, if necessary.

- SPS's athletic facility use would continue to comply with City of Seattle Parks and Recreation Department Policy #060-P7.1.1, which allows for activities until 9:45 PM. Facility security lighting could remain on until 10:00 PM to allow users to safely leave the facility.
- Athletic facility projects under the BEX VI Capital Levy Program would not include the provision of any permanent public address system. Amplified sound through the use of portable systems could be allowed on a limited basis for school-related events to the extent that they are necessary for the operation of the event/activity. The use of portable amplification systems would be restricted for non-school-related events.
- In the event that specific individual activities may cause noise issues, the City of Seattle maintains a 24-hour noise complaint hotline that can be used by the community surrounding the project site.

3.4.4 Significant Unavoidable Adverse Impacts

During construction activities, some temporary noise impacts would occur; however, SPS would ensure that all construction-related activities comply with the City of Seattle's Noise Ordinance. Appropriate project-level environmental review would be prepared for individual projects included in the potential BEX VI Capital Levy Program, and site-specific information about the significance of potential noise impacts would be further assessed at that time. With appropriate mitigation for each site, no significant adverse noise impacts are anticipated.

3.5 LAND USE

This section of the Final Programmatic EIS (FPEIS) describes existing land use conditions for the potential BEX VI Capital Levy Program sites and evaluates potential impacts that could occur as a result of development of the BEX VI Capital Levy Program under the EIS Alternatives. SPS will conduct phased environmental review for projects under the BEX VI Capital Levy Program. Project-specific environmental review will be completed, as appropriate, for individual projects when the District begins project-specific planning, design and construction activities.

3.5.1 Affected Environment

Existing Conditions

All SPS school and facility locations, including potential BEX VI Capital Levy Program project site locations, are located within urban areas of the City of Seattle. The majority of the SPS school sites are located within single family residential or multi-family residential areas. Public school facilities are a permitted use in residential zoned areas according to the City of Seattle Municipal Code and SMC 23.51B.002 identifies the development standards for public schools in residential zones. The code also includes procedures through which departures from the required development standards can be granted for public school building development (SMC 23.79).

Existing Zoning and Adjacent Land Uses

The City of Seattle's Land Use Code (SMC Title 23) governs the use and development of land within the City of Seattle. Most public school sites are located within residential zones and as such, the majority of existing land uses surrounding public schools is heavily residential (single family residences and multi-family residences). Depending on the location, some schools are located in proximity to commercial uses (retail, office, etc.), churches, parks, and warehouses. Other non-scholastic SPS facilities (e.g. warehouse uses) are located near industrial and warehouse uses. **Table 3.5-1** provides a summary of the existing zoning for potential project sites under the BEX VI Capital Levy Program, as well as adjacent existing land uses. Existing zoning designations in **Table 3.5-1** include:

- Neighborhood Residential 2 (NR2) Areas characterized by houses, generally single family dwelling units, with a minimum lot size of 7,200 sq. ft.
- Neighborhood Residential 3 (NR3) Areas characterized by houses, generally single family dwelling units, with a minimum lot size of 5,000 sq. ft.
- Neighborhood Residential, Small Lot (RSL) Areas that allow for the development of one or more dwelling units in small-scale structures on lots in urban villages.
- Residential Multifamily Lowrise 2 (LR2) Areas characterized by multi-family housing types in small-scale neighborhoods with arterial streets.

- Residential Multifamily Lowrise 3 (LR3) Areas characterized by multi-family housing types in moderate-scale multi-family neighborhoods with good transit service on arterial streets and near commercial zones.
- Neighborhood Commercial 3 (NC3) Larger pedestrian-oriented shopping districts that provide a wide range of goods and services to the surrounding neighborhood and a larger community or region.
- Maritime Manufacturing and Logistics (MML) Areas with concentrations of core and legacy industrial uses on flat areas that are proximate to rail and ports.

Table 3.5-1
Summary of Existing Zoning and Adjacent Land Uses at Potential BEX VI Sites

| SPS Site Location | Existing Zoning | Adjacent Land Uses | | | |
|---|---|--|--|--|--|
| Replacement School | Replacement School or New Building at New Site Projects | | | | |
| Bailey Gatzert ES | NC3 | Multi-family residential, single family residential, commercial/retail, warehouse. | | | |
| Sacajawea ES | NR3 | Single family residential, parks. | | | |
| Whitman MS | NR2 | Single family residential, parks. | | | |
| Seattle World School HS (T.T. Minor School) | LR3 | Multi-family residential, single family residential, parks, parking, church. | | | |
| Modernization or Addition Projects | | | | | |
| Lowell ES | LR3 | Single family residential, multi-family residential, parks. | | | |
| STEM K-8 at Louisa Boren | NR3 | Single family residential, multi-family residential, vacant/vegetated. | | | |
| Aki Kurose MS | NR3 | Single family residential, multi-family residential, parks, commercial/retail. | | | |
| Franklin HS | NR3 | Single family residential, multi-family residential, commercial office/retail. | | | |
| Chief Sealth International HS | NR3 | Single family residential, multi-family residential, parks, church. | | | |
| West Seattle HS | NR3 | Single family residential, multi-family residential, parks, church. | | | |
| Interagency HS (Columbia School) | LR2 | Single family residential, multi-family residential, commercial/retail, church, parks. | | | |
| Interagency HS (Roxhill Site) | NR3 | Single family residential, parks, commercial/retail, multi-family residential. | | | |
| Van Asselt Interim Site | NR3 | Multi-family residential, single family residential, parks, church. | | | |
| John Marshall Interim Site | LR3 | Multi-family residential, single family residential, church, Interstate 5. | | | |

| SPS Site Location | Existing Zoning | Adjacent Land Uses | | |
|--|-----------------|---|--|--|
| Athletic Field Projects | <u> </u> | | | |
| Salmon Bay K-8 | NR3 | Single family residential, parks. | | |
| Eckstein MS | NR3 | Single family residential. | | |
| Whitman MS | NR2 | Single family residential, parks. | | |
| Robert Eagle Staff MS | LR2 | Multi-family residential, single family residential, school. | | |
| Denny MS/Chief Sealth HS Athletic Fields | NR2 | Single family residential, multi-family residential, post office, commercial/ retail. | | |
| Franklin HS | NR3 | Single family residential, multi-family residential, commercial office/retail. | | |
| Roosevelt HS | NR3 | Single family residential, multi-family residential, commercial. | | |
| Van Asselt Interim Site | NR3 | Multi-family residential, single family residential, parks, church. | | |
| Lighting Projects | | | | |
| Eckstein MS | NR3 | Single family residential. | | |
| Jane Addams MS | NR2 | Single family residential, school, commercial. | | |
| Ingraham HS | NR2 | Single family residential, parks, warehouse, commercial. | | |
| Chief Sealth HS Athletic Fields | NR3 | Single family residential, multi-family residential, parks, church. | | |
| Ballard HS | LR2 | Single family residential, multi-family residential, recreation. | | |
| Play Area Surface Conversion Projects | | | | |
| Leschi ES | NR3 | Single family residential, multi-family residential, parks. | | |
| Genesee Hill ES | NR3 | Single family residential. | | |
| Bryant ES | NR3 | Single family residential. | | |
| Gatewood ES | RSL | Single family residential, multi-family residential. | | |
| Concord ES | RSL | Single family residential. | | |
| Site Improvement Pro | jects | | | |
| Wedgewood ES | NR3 | Single family residential. | | |
| Stevens ES | NR3 | Single family residential. | | |
| Dearborn Park ES | NR3 | Single family residential, parks. | | |
| Arbor Heights ES | NR2 | Single family residential. | | |
| STEM K-8 at Louisa Boren | NR3 | Single family residential, multi-family residential, vacant/vegetated. | | |
| Madison MS | NR3 | Single family residential. | | |
| | | | | |

| SPS Site Location | Existing Zoning | Adjacent Land Uses |
|---|-----------------|---|
| Nathan Hale HS | NR2 | Single family residential, multi-family residential, park, commercial/retail. |
| Cascade Parent Partnership (at North Queen Anne School) | NR3 | Single family residential, multi-family residential, parks. |

Source: SPS and City of Seattle, 2024.

Comprehensive Plan

The City of Seattle's current Comprehensive Plan (Seattle 2035, Comprehensive Plan: Managing Growth to Become an Equitable and Sustainable City 2015-2035) was adopted in 2016 with the most recent updates occurring in 2022 (One Seattle Plan Comprehensive Plan Update). The Comprehensive Plan provides the 20-year vision and roadmap for Seattle's future growth and guides City decisions on where to build new jobs and houses, how to improve the transportation system and where to make capital investments such as utilities, sidewalks and libraries. The Plan is consistent with the Washington State Growth Management Act, Vision 2040 and King County's Countywide Planning Policies. The next major update to the One Seattle Plan Comprehensive Plan is scheduled to occur in 2024 with completion of a draft document and potential adoption by the City Council by the end of 2024.

The Land Use Element of the Comprehensive Plan identifies public facilities and small institutions such as schools as necessary to provide needed services to residents but serve special functions that require them to be different from other buildings and uses in the same zone. Specifically, Policy LU 3.2 states to "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 greater flexibility for schools in recognition of their important role in the community". Policy CF 5.3 also states to "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 easier for students and families to walk and bike to school" (City of Seattle, 2022).

Seattle Municipal Code

SMC 23.51B identifies the development standards for public schools in residential zones, including lot coverage requirements, maximum building heights, setbacks, structure width, parking requirements, bus loading and unloading requirements, and noise, odor, light and glare standards. As noted above, the majority of SPS school sites are located in residential zoned areas which can make it difficult to design a project in a way that meets the City of Seattle Land Use Code requirements while still fulfilling the educational program needs for each school. Therefore, the City of Seattle established SMC 23.79 which includes procedures through which departures from the required development standards can be granted for public school building development.

Under SMC 23.79, SPS can apply for a departure from development standards by submitting an application to the Director of the Department of Construction and Inspections (SDCI). Upon receipt of an application, SDCI will forward it to the Department of Neighborhoods (DON) which will establish a Development Standard Advisory Committee to secure comments from the public (including at least one public meeting) and make recommendations on the departures from development standards. In reaching a recommendation, the advisory committee would consider the following factors:

- Appropriateness in relation to the character and scale of the surrounding area.
- Presence of edges (e.g., significant setbacks, major arterials, topographic breaks or similar features) which provide a transition in scale.
- Location and design of structures to reduce the appearance of bulk.
- Impacts on traffic, noise, circulation and parking in the area.
- Impacts on housing and open space.

Flexibility in the development standards may be allowed if the impacts on the surrounding community are anticipated to negligible or are reduced by mitigation; whereas, a minimal amount or no departure from development standards may be allowed if the anticipated impacts are significant and cannot be satisfactorily mitigated.

The physical requirements of the specific proposal and the relationship to educational need shall be balanced with the level of impacts on the surrounding area. Greater departure can be allowed for special facilities such as a gymnasium, which are unique and/or an integral part of the education process; while a lesser or no departure can be granted for a facility which can be accommodated within the established development standards.

In addition to the development standards for public school development, the City of Seattle Land Use Code also provides standards and regulations for athletic facility lighting such as that which is included in the potential BEX VI Capital Levy Program. SMC 23.51B.002(D)(6) identifies standards for illumination of athletic facilities at public school sites and indicates that light standards may exceed the maximum permitted height, up to 100 feet, if the Director determines that the additional height is necessary to ensure adequate illumination and that impacts from light and glare are minimized to the greatest extent possible. An engineer's report must be submitted to demonstrate that impacts from light and glare are minimized and that the additional height contributes to the reduction in impacts from light and glare.

Seattle SEPA Regulations

While SPS would be the lead agency for SEPA compliance for any potential project under the BEX VI Capital Levy Program, the City of Seattle can also use the substantive authority granted by SEPA to condition or deny a proposal in order to mitigate significant adverse environmental impacts identified by the lead agency. SMC 25.05 serves as the City's SEPA Ordinance and outlines policies and procedures that the City utilizes to implement SEPA. SMC 25.05.660 identifies the policies that the City can utilize to mitigate environmental impacts for non-exempt public and private proposals. Environmental elements that are

applicable to the implementation of the BEX VI Capital Levy Program would generally include those elements that are analyzed in this FPEIS document.

3.5.2 Impacts of the Alternatives

This section of the FPEIS identifies how the potential BEX VI Capital Levy Program under the EIS Alternatives would relate to land uses during construction and long-term operations.

Alternative 1 - No Action Alternative

Under Alternative 1 – No Action Alternative, the BEX VI Capital Levy Program would not move forward, and no construction activities or associated construction-related land use impacts would occur at SPS project sites. To the extent that increased enrollment may occur, since public schools are obligated by law to accommodate additional students, a minor increase in student-related activity (e.g., noise from additional students at recess or other outdoor activities during the school day) could occur that may affect adjacent land uses. However, there would be no changes in the land use of SPS-owned properties under the No Action Alternative.

If portable classroom buildings are required at certain site locations, the installation of those buildings could result in a small, temporary increases in construction-related impacts (e.g., noise, air quality emissions, traffic, etc.) that could affect nearby land uses while those portable buildings are installed on certain sites. The installation of portable buildings on a site would not change the land use of that site, but permitting would be required and the placement of portable buildings would need to meet the applicable land use code requirements. If necessary, SPS would apply for a departure as part of the project-specific design process and would comply with the departure process, including any appropriate conditions as required by the City of Seattle. It is anticipated that the No Action Alternative would not result in any significant, unavoidable adverse land use impacts.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Alternative 2 includes potential projects under the BEX VI Capital Levy Program that would be implemented at up to 42 sites around the District. These project types would include: major construction projects at up to 15 sites; athletic, playfield, and/or lighting improvements at up to 18 sites; and site improvements at up to 8 sites. The major construction projects could consist of school building replacements, new buildings at new sites, modernization and additions, building reconfigurations, and systems repair and replacement projects. The athletic facility and playfield improvements primarily would involve turf replacements, conversions to synthetic turf, and/or facility lighting installations and upgrades. This section analyzes the range of potential impacts that can result from each project type under Alternative 2. The analysis is presented at a planning level of detail consistent with a programmatic analysis. SPS will conduct project-level environmental analysis (including land use) as appropriate for each project when sufficient project-level details are available for specific projects.

Construction Impacts

Potential land use impacts under the BEX VI Capital Levy Program are generally considered operational impacts and are discussed in further detail below. Construction-related impacts for potential projects under the BEX VI Capital Levy Program that could affect surrounding land uses would typically include air quality, noise, and transportation. Construction-related impacts associated with those environmental elements are discussed in detail in **Section 3.1**, Air Quality; **Section 3.4**, Noise; and **Section 3.10**, Transportation.

Operation Impacts

The following describes potential land use impacts that could occur with the operation of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement School and New Buildings at New Site Projects

Potential replacement school projects under Alternative 2 would not result in a change in land use since each of those sites are currently used by existing schools and would continue to be utilized for school use. Existing buildings on specific sites would be demolished to accommodate the replacement schools which would not change the use of the sites. Existing students and staff would likely be temporarily relocated to an offsite location during the development of replacement schools. Replacement school buildings could be taller and/or larger than existing buildings on their respective sites which would result in an increase in building height and bulk when compared to the buildings that they are replacing.

Development of new buildings on new site projects would utilize property that is currently owned by SPS to construct a new building. Potential development of a new building would likely require building demolition that would displace the existing use on the site and depending on the existing use and potential use for the site, development of a new building could result in a change of use. Any change of use would be consistent with permitted uses for their respective zoning as identified in the City of Seattle Land Use Code. Potential development of a new building on a new site could also result in a taller and/or larger building than what currently exists on the site which would result in an increase in building height and bulk when compared to the existing condition.

Potential development of replacement schools and new buildings at new site projects could also result in an increase in activity levels on the site if the new buildings allow for an increase in student capacity. For replacement schools, the source of this activity (e.g., student noise, traffic, recreation use, etc.) would be similar to the existing use; however, the level of activity could increase with additional students and staff on the site. Potential impacts associated with an increase activity levels, including noise, traffic, air quality, and recreation are discussed in further detail in Section 3.1, Air Quality; Section 3.4, Noise; Section 3.7, Recreation; and Section 3.10, Transportation.

As part of project-specific design, SPS would strive to design potential projects to meet applicable land use and zoning requirements. However, as noted previously, the majority of SPS school sites are located in residential zoned areas which can make it difficult to design a project in a way that meets the City of Seattle Land Use Code requirements while still

fulfilling the educational program needs for each school. Departures from development standards can be applied for from the City of Seattle as part of SMC 23.79 which includes procedures through which departures from the required development standards can be granted for public school building development. Code requirements that can be difficult to meet for replacement schools and new buildings at new site projects could include building height, setbacks, bulk and scale, bus loading, parking, and electronic reader board signage. If necessary, SPS would apply for a departure as part of the project-specific design process and would comply with the results of the departure process, including any appropriate conditions as required by the City of Seattle.

Modernization and Addition Projects

Potential modernization projects under the BEX VI Capital Levy Program for Alternative 2 would generally involve improvements to existing SPS buildings and would not result in a change in land use or be anticipated to affect land uses.

Potential building addition projects would result in similar types of land use issues as described above for replacement schools but at a slightly lower level due to the size of the potential projects. Building addition projects would not result in a change in land use but could increase activity levels on the site if the potential project results in an increase in student capacity at the site. While this increase in activity levels would typically be lower than replacement school buildings, it could result in a slight increase in noise, traffic, air quality, and recreation use. Potential impacts associated with these elements are discussed in further detail in Section 3.1, Air Quality; Section 3.4, Noise; Section 3.7, Recreation; and Section 3.10, Transportation. Building addition projects would require some level of demolition of an existing building and project-specific design would be intended to meet the applicable zoning requirements for the City of Seattle. If necessary, a departure from development standards could be applied for and SPS would comply with the results of the departure process, including any appropriate conditions as required by the City of Seattle.

Building Reconfiguration Projects

Potential building reconfiguration projects would be implemented in existing facilities to better accommodate SPS program elements or changes to student needs. These projects would not result in a change in land use and would not be anticipated to affect adjacent land uses.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Potential athletic field, play area, site improvement, and lighting projects for the BEX VI Capital Levy Program under Alternative 2 would not result in a change of land use on any potential project site. Implementation of the potential athletic field, play area and lighting projects would result in increased activity levels on the site from extended and increased use of athletic and recreation facilities. Increases in activity would include increased noise, traffic and recreation uses. Potential impacts associated with these environmental elements are discussed in further detail in **Section 3.4**, Noise; **Section 3.7**, Recreation; and **Section 3.10**, Transportation.

Potential new lighting for athletic facilities under the BEX VI Capital Levy Program would be noticeable from land uses that are adjacent to potential project sites. Light and glare impacts that would be associated with new light are discussed in further detail in Section 3.6, Aesthetics/Light and Glare. All new lighting for athletic facilities would be designed in accordance with City of Seattle requirements, including SMC 23.51B.002(D)(6)

System Repair and Maintenance Projects

Potential system repair and maintenance projects under Alternative 2 would generally occur within existing buildings and would not be anticipated to result in a change in land use or impact land uses.

Cumulative Impacts

Development of potential projects under the BEX VI Capital Levy Program with Alternative 2 are not anticipated to result in substantial land uses that would result in cumulative impacts. Potential development of replacement schools, new buildings on new sites, and building additions would likely result in increases in height, bulk and scale on specific project sites which could contribute to a cumulative increase in height, bulk and scale in areas where future development projects could occur on surrounding properties. To the extent that potential projects under Alternative 2 are designed to be consistent with the existing zoning requirements and departures process (if applicable) then significant land use impacts would not be anticipated.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Under Alternative 3, SPS would implement a modified selection of potential projects identified for the BEX VI Capital Levy Program. Most notably when compared to Alternative 2, Alternative 3 does not include any replacement school projects or new buildings at new site projects but does include two additional modernization and addition projects (Bailey Gatzert ES and the Skills Center). See **Table 2-2** for a summary of projects assumed for Alternative 3 and a comparison to those identified for Alternative 2.

Construction Impacts

Similar to Alternative 2, potential land use impacts under the BEX VI Capital Levy Program are considered operational impacts. Construction-related impacts for potential projects under the BEX VI Capital Levy Program that could affect surrounding land uses would typically include air quality, noise, and transportation. Construction-related impacts associated with those environmental elements are discussed in further detail in **Section 3.1**, Air Quality; **Section 3.4**, Noise; and **Section 3.10**, Transportation.

Operation Impacts

Under Alternative 3, the potential BEX VI Capital Levy Program would result in similar types of operational land use impacts as those identified for Alternative 2. However, since there would be no replacement school projects on new buildings on new site projects under Alternative 3, it is anticipated that there would be less potential for increased height, bulk and scale that would be associated with those types of potential projects on specific sites. The potential for displacement of existing land uses that would be associated with a new building on a new site project would also not occur under Alternative 3. However, Alternative 3 assumes that potentially two additional modernization/addition projects at Bailey Gatzert ES and the Skills Center would occur. These assumptions for Alternative 3 would result in additional impacts from modernization and addition projects when compared to Alternative 2, but such impacts at Bailey Gatzert ES and the Skills Center would be anticipated to be lower than what could occur with the replacement projects for those sites that are identified under Alternative 2.

Potential land use impacts under Alternative 3 for building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects would be the same as described for Alternative 2.

Cumulative Impacts

Similar to Alternative 2, development of potential projects under Alternative 3 are not anticipated to result in substantial land uses that would result in cumulative impacts. Potential development of building additions would likely result in increases in height, bulk and scale on specific project sites which could contribute to a cumulative increase in height, bulk and scale in areas where other future development projects could occur on surrounding properties. To the extent that potential projects under Alternative 3 are designed to be consistent with the existing zoning requirements and the departures process (if applicable) then significant land use impacts would not be anticipated.

3.5.3 Mitigation Measures

The following mitigation measures have been identified to further reduce the potential for land use impacts associated with potential projects in the BEX VI Capital Levy Program under the EIS Alternatives:

Construction

 Construction-related land use impacts are not anticipated, and no additional mitigation is identified.

Operation

- Project-specific design of potential projects under the BEX VI Capital Levy Program
 would strive to comply with the applicable provisions of the Seattle Land Use Code,
 including SMC 23.51B which identifies the development standards for public schools
 in residential zones.
- Potential increases in height, bulk and scale could be minimized through projectspecific design strategies such as the position/orientation of a building on the site; limits to overall building height; modifications to building bulk; modifications to setbacks; modifications to building façade details; and, implementation of landscaping.
- If necessary, potential projects could apply for a departure as part of the project-specific design process and in accordance with SMC 23.79. SPS would comply with the results of the departure process, including any appropriate conditions as required by the City of Seattle.
- As appropriate, additional environmental review would be required for certain potential projects under the BEX VI Capital Levy Program and additional specific mitigation measures would also be identified, as necessary, during the design process and project-specific environmental review.

3.5.4 Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse land use impacts are anticipated to result from implementation of the potential projects included in the BEX VI Capital Levy Program. Appropriate project-specific environmental review will be prepared for individual projects included in the BEX VI Capital Levy Program and additional site-specific information about potential land use impacts would be further assessed at that time. With appropriate mitigation for each site, significant adverse land use impacts are not anticipated.

3.6 **AESTHETICS/LIGHT & GLARE**

This section of the Final Programmatic EIS (FPEIS) describes existing aesthetics, light and glare conditions for the potential BEX VI Capital Levy Program sites and evaluates potential impacts that could occur as a result of development of the BEX VI Capital Levy Program under the EIS Alternatives. SPS will conduct phased environmental review for projects under the potential BEX VI Capital Levy Program. Project-specific environmental review will be completed, as appropriate, for individual projects when the District begins project-specific planning, design and construction activities.

3.6.1 Affected Environment

Existing Conditions

Aesthetics

All SPS school and facility locations, including potential BEX VI Capital Levy Program project site locations, are located within urban areas of the City of Seattle. The majority of the SPS school sites are located within single family residential or multi-family residential areas; some sites are located adjacent to commercial areas as well. The aesthetic character of residential neighborhoods are generally comprised of one- to three-story structures for single family residential areas and slightly taller and larger buildings for multi-family residential areas. Commercial building uses in the vicinity of potential sites are generally larger than residential uses and can be dependent on the type of building use. Office building uses would generally be taller, while retail or shopping center uses would generally be single-story but with a larger building footprint. Due to the nature of their use, SPS buildings are generally taller and larger than single family residences in their respective neighborhoods.

The City of Seattle maintains SEPA policies and regulations for height, bulk and scale as part of SMC 25.05.675(G). It is the City's policy that the height, bulk and scale of development projects should be reasonably compatible with the general character of development anticipated by the goals and policies set forth in the City's Comprehensive Plan. Citywide design guidelines and Council-approved neighborhood design guidelines are intended to mitigate those same adverse height, bulk and scale impacts addressed in these policies.

As noted in Section 3.5 Land Use, SMC 23.51B identifies the development standards for public schools in residential zones, including lot coverage requirements, maximum building heights, setbacks, structure width, parking requirements, bus loading and unloading requirements, and light and glare standards. As noted above, the majority of SPS school sites are located in residential zoned areas which can make it difficult to design a project in a

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way that meets the City of Seattle Land Use Code requirements while still fulfilling the educational program needs for each school.

In the event that a project cannot meet the development standards, the City of Seattle established SMC 23.79 which includes procedures through which departures from the required development standards can be granted for public school building development. The physical requirements of the specific proposal and the relationship to educational need shall be balanced with the level of impacts on the surrounding area. Greater departures can be allowed for special facilities such as a gymnasium, which are unique and/or an integral part of the education process. Gymnasiums in particular require specific building dimensions and heights in order to fulfill the necessary programming requirements that are needed for each school.

Views

As part of its SEPA regulations, it is the City of Seattle's policy 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. The following SPS sites are identified as part of SMC 25.05.675(P) as having SEPA protected views:

- Ballard High School
- Cleveland High School Playfield
- Emerson Elementary School
- Hughes Elementary School
- Magnolia Elementary School Playground¹

The only school identified above that is a potential project site under the BEX VI Capital Levy Program is Ballard High School. The Ballard High School viewpoint is located on the south side of the school campus within the main lobby of the school building. This viewpoint location within the school provides a distant, framed view of the Downtown skyline to the south.

The City of Seattle also protects view corridors as part of the Downtown zoning requirements (SMC 23.49.024), scenic routes (City of Seattle ordinances #97025 and #114057), and views of landmarks (SMC 25.05.675(H)). Landmarks are discussed in further detail in Section 3.9, Historic Resources.

¹ It should be noted that the address of the Magnolia Elementary School Playground viewpoint, location map, and view images/description within the *Seattle Views* document identify the site as the current Ella Bailey Park (immediately east of Magnolia Elementary School) which was once a former play area for Magnolia Elementary School but was since developed into a public park in 2007. It should also be noted that Briarcliff Elementary School and Broadview Elementary School are also identified as having protected views in the City's SEPA regulations but have since been closed and sold by SPS.

Light and Glare

Light and glare requirements for institutions such as public schools are established in SMC 23.45.570(I). Requirements for light and glare include the following:

- Exterior lighting for institutions shall be shielded or directed away from principal structures on adjacent residential lots.
- Poles for freestanding exterior lighting are permitted up to a maximum of 30 feet.
 Light poles for illumination of athletic fields on new and existing public school sites will be allowed to exceed 30 feet pursuant to SMC 23.51B

Standards for the lighting of athletic facilities at public school sites are noted in SMC 23.51B.002(D)(6) which indicates that light standards may exceed the maximum permitted height, up to 100 feet, if the Director determines that the additional height is necessary to ensure adequate illumination and that impacts from light and glare are minimized to the greatest extent possible. An engineer's report must be submitted to demonstrate that impacts from light and glare are minimized and that the additional height contributes to the reduction in impacts from light and glare.

Potential sites under the BEX VI Capital Levy Program are located in urban areas of the City of Seattle and the majority of the sites are generally located adjacent to residential uses and certain commercial uses. Primary sources of light on SPS sites include interior and exterior building lighting, pole-mounted streetlights and parking lot lighting, lighting from vehicle headlights, and pedestrian-scale lighting for walkways. Sources of glare can include reflected sunlight from building surfaces such as glass and metal, as well as vehicles. In general, the primary source of lighting in most residential neighborhoods is street lighting and lighting from vehicle headlights. Commercial areas and major roadways generally have higher levels of light and glare than residential areas.

3.6.2 Impacts of the Alternatives

This section of the FPEIS identifies how the potential BEX VI Capital Levy Program under the EIS Alternatives would relate to aesthetics, light and glare during construction and longterm operations.

Alternative 1 – No Action Alternative

Under Alternative 1 – No Action Alternative, no potential projects would occur under the BEX VI Capital Levy Program and no construction activities or associated construction-related aesthetics or light/glare impacts would occur at SPS project sites. To the extent that increased enrollment may occur, since public schools are obligated by law to accommodate additional students, an increase in student enrollment could occur which may require the use of portable classroom buildings on certain sites.

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If portable classroom buildings are required at certain locations, the installation of those buildings could result in small, temporary construction-related impacts from the staging of construction vehicles and equipment. Depending on their location, the installation of portable buildings on a site could result in minor changes to the aesthetic character of the site with the addition of new portable buildings. As part of the design and siting process for specific projects, SPS would strive to find the most appropriate location for portable classroom buildings to minimize the effect on aesthetic character. Therefore, it is anticipated that the No Action Alternative would not result in any significant, unavoidable adverse aesthetic or light and glare impacts.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Alternative 2 includes potential projects under the BEX VI Capital Levy Program that would be implemented at up to 42 sites around the District. These project types would include: major construction projects at up to 15 sites; athletic, playfield, and/or lighting improvements at up to 18 sites; and site improvements at up to 8 sites. The major construction projects could consist of school building replacements, new buildings at new sites, modernization and additions, building reconfigurations, and systems repair and replacement projects. The athletic facility and playfield improvements primarily would involve turf replacements, conversions to synthetic turf, and/or facility lighting installations and upgrades. This section analyzes the range of potential aesthetics and light/glare impacts that can result from each project type under Alternative 2. The analysis is presented at a planning level of detail consistent with a programmatic analysis. SPS will conduct project-level environmental analysis (including aesthetics, light and glare) as appropriate for potential projects under the BEX VI Capital Levy Program when sufficient project-level details are available for specific projects.

Construction Impacts

The following describes potential aesthetic, light and glare impacts that could occur during temporary construction activities for potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement School and New Buildings on New Site Projects

During the development of potential projects under the BEX VI Capital Levy Program, temporary construction-related impacts could occur. Construction staging and materials/equipment storage, vegetation clearing, and the increased presence of construction vehicles, equipment, workers, and materials would all temporarily change the aesthetic character of a specific site during the construction process. The staging of materials and equipment storage could result in temporary obstruction of some views surrounding the potential project sites; however, these impacts from staging would be temporary and not anticipated to be significant. To the extent that protected views or scenic routes are located in the vicinity of a potential project site, those views could also be temporarily affected. Construction activities associated with replacement schools and new buildings on new site projects would be the most extensive of the potential projects identified

under the BEX Capital Levy Program and have the greatest potential for constructionrelated impacts, but such impacts would be temporary and would end once construction is completed on a given site.

Modernization and Addition Projects

Potential modernization and addition projects under Alternative 2 would result in similar construction-related impacts as replacement school projects including change in aesthetic character and temporary obstruction of views due to construction staging and storage, site clearing, and increase presence of construction equipment, vehicles and workers. As described above, such impacts would be temporary and would be anticipated to be lower than replacement schools due to the lower scale of construction for modernization and addition projects.

Building Reconfiguration Projects

Construction of building reconfiguration projects would be anticipated to have a lower potential for construction-related aesthetic impacts than replacement school projects or new buildings since construction for these types of projects would generally occur within the existing buildings.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Under Alternative 2, potential projects would result in similar types of construction-related impacts as replacement school projects including change in aesthetic character and temporary obstruction of views due to construction staging and storage, site clearing, and increase presence of construction equipment, vehicles and workers. As described above, such impacts would be temporary and would be anticipated to be lower than replacement schools due to the lower scale of construction for athletic field, play area, site improvement and lighting projects.

System Repair and Maintenance Projects

Construction of system repair and maintenance projects would be anticipated to have a lower potential for construction-related aesthetic impacts than replacement school projects or new buildings since construction for these types of projects would generally occur within the existing buildings.

Operation Impacts

The following describes potential aesthetics, light and glare impacts that could occur with the operation of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement School and New Buildings on New Site Projects

Aesthetics

Potential replacement school and new buildings on new site projects under the BEX VI Capital Levy Program would generally involve the demolition of existing buildings and facilities on specific sites to accommodate the development of replacement and new buildings. It is anticipated that replacement and new buildings would be larger than existing buildings on their given sites which would result in changes in aesthetic character due to increased height, bulk and scale. In most cases, existing school buildings already have larger heights and building footprints than adjacent residential uses, but the visual contrast would increase if potential replacement schools or new buildings are larger than existing onsite buildings. There would also be changes to landscape and architectural style of development with these projects. Visual changes for replacement schools and new buildings would be noticeable for neighbors that are proximate to potential project sites.

Each potential replacement school or new building would be designed and located on a site to be consistent with all applicable zoning requirements and design guidelines to the maximum extent feasible. However, as noted above, in the event that a project cannot meet the development standards, SPS would apply for a departure from the required development standards (SMC 23.79) and comply with the City's departures process and any potential conditions that are provided as part of that process. The departures process is intended to ensure that physical requirements of the specific proposal shall be balanced with the level of Impacts on the surrounding area.

No replacement school or new buildings on new site projects are located at sites that have SEPA protected views. However, depending on project-specific design and siting details, potential projects could affect SEPA protected views or scenic routes in the surrounding site vicinity. A further assessment of potential impacts to SEPA protected views and scenic routes in the vicinity of potential project sites would be completed as part of project-specific environmental review, as appropriate.

Light and Glare

The development of potential replacement schools and new buildings on new site projects would result in new sources of light and glare on specific sites that would be noticeable from adjacent properties. Light and glare sources associated with these types of projects would generally include interior and exterior building lighting, parking lot lighting, pedestrian-scale lighting for walkways, and other lighting that would be necessary for safety. Lighting for these projects would be designed to minimize light spill and light trespass and would comply with the applicable lighting standards and requirements of the City of Seattle, including SMC 23.45.570. As a result, significant light and glare impacts would not be anticipated.

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Modernization and Addition Projects

Aesthetics

Potential modernization projects under Alternative 2 would typically include work within the interior of existing buildings; some exterior work such as new windows or doors could also be involved with a modernization project. Such projects would not be anticipated to change the aesthetic character of potential development sites or affect views.

Potential building addition projects could result in increased height, bulk and scale on a specific project site that could result in changes to aesthetic character. Building additions would be anticipated to have smaller height, bulk and scale impacts than replacement schools or new buildings due to the smaller scale of those types of projects. As part of the project-specific design process, SPS would strive to design potential additions to blend and be complementary of the existing building to the extent possible. Project-specific design would also be intended to comply with all applicable zoning requirements of the City of Seattle. If potential projects cannot comply with those requirements, then SPS would apply for departures in accordance with the City's requirements.

Light and Glare

The development of potential modernization projects would generally include work within the interior of the existing buildings. Some modifications to interior or exterior building lighting could occur as part of the projects but changes to lighting would be consistent with City requirements, including SMC 23.45.570.

Potential building addition projects would have a greater likelihood for additional light and glares to be introduced to a specific site, but potential changes to light and glare would be lower than replacement schools and new buildings due to the size of these types of projects. Building additions would result in new sources of interior and exterior building lighting associated with the potential addition and could be noticeable from adjacent properties. However, potential lighting would be designed to be consistent with City requirements and would not be expected to result in a significant impact.

Building Reconfiguration Projects

Building reconfiguration projects under Alternative 2 would occur within existing facilities to better accommodate SPS program elements or changes to student needs. These projects would not be anticipated to result in operational aesthetic, light or glare impacts,

Athletic Field, Play Area, Site Improvements and Lighting Projects

Aesthetics

Potential athletic field, play area and other site improvement projects would involve conversion of natural grass surface athletic fields to synthetic turf or the replacement of synthetic turf with a new surface. These types of projects would not be anticipated to result in substantial changes to aesthetic character and would not introduce any new sources of

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light or glare to specific sites. Other site improvement projects under the potential BEX VI Capital Levy Program would involve stormwater improvements, new sidewalks, retaining wall repairs, and improvements adjacent to Thornton Creek. These types of projects could result in beneficial changes to aesthetic character by providing upgrades or repairs to areas in need such as sidewalks, retaining walls or areas adjacent to Thornton Creek.

As indicated in Chapter 2, one of the potential lighting projects that is identified in the BEX VI Capital Levy Program is to upgrade the existing lighting facilities for the tennis courts at Ballard High School. **Section 3.6.1** notes that Ballard High School is considered a SEPA protected view location. However, since the specific location of the protected view is within the main lobby of the school building looking to the south and the tennis courts are located on the opposite end of the school campus at the north end of the school, it is anticipated that upgrades to the existing lights at the school's tennis courts would not result in an impact to the SEPA protected view at Ballard High School.

Light and Glare

The development of potential athletic facility lighting projects would upgrade existing athletic facility lighting or introduce new athletic facility lighting to a given site. Upgrades to existing lighting would not add any new light sources to specific site, but the potential use of upgraded fixtures, updated shielding, or use of LED lights could allow for light to be more focused on the playing areas and result in less light and glare leaving the site area to adjacent properties. As such, potential lighting facility upgrade projects would be anticipated to result in improved light and glare conditions when compared to the existing lighting systems.

Potential new lighting systems at SPS athletic facilities under the BEX VI Capital Levy Program would introduce new sources of light and glare to specific project sites and result in some level of spill light/light trespass, sky glow and glare. SPS athletic facility lighting systems are generally connected to a fully programmable control system to allow lights to be on when scheduled for use but also pre-set to turn off at specific time (typically 10:00 PM). The system also allows the lights to remain off when facilities are not scheduled for use.

Spill light from athletic facility lighting can generally occur when light does not reach the intended target area of illumination, while light trespass occurs when spill light extends on to adjacent properties. Current City of Seattle guidelines recommend that athletic facility spill light should not exceed 0.8 foot-candles at adjacent residential property lines. Potential new lighting projects would be designed to meet the City's spill light guidelines. However, in order to achieve this, many recent SPS athletic field lighting projects have utilized light poles that exceed the City's height requirements of 30 feet in residential area. For example, and in accordance with SMC 23.51B.002(D)(6), new field lighting that was proposed at the Van Asselt Interim Site included light poles that would be approximately 70 feet tall. A special exemption for height was applied for the project consistent with SMC 23.51B.002(D)(6) and the taller light poles allowed the light fixtures to be aimed down toward the athletic field and at steeper angles to create greater effectiveness of the proposed fixture shielding features. As a result, more light would be directed toward the field area and less light would escape the boundaries of the field. With the proposed taller light poles and shielding features, the maximum amount of measurable light at the closest residence along the south boundary of

the property was 0.1 foot-candles which would be far below the 0.8 foot-candle recommended guideline for the City of Seattle. For comparison, if lights were mounted at a height of 30 feet, the amount of measurable light that would leave the property would be 5.1 foot-candles (SPS, 2023).

Sky glow occurs when light is emitted above a light fixture and escapes into the atmosphere which reduces the view of the night sky. While some levels of sky glow can occur with any lighting project, the use of taller light poles to direct light downward and create steeper aiming angles, as well as the use of full cut-off, shielded light fixtures would block a substantial amount of light from being emitted into the atmosphere and thereby minimize the level of sky glow that could occur from a potential athletic facility lighting project.

Another consideration for potential athletic facility lighting projects is glare which can be produced directly from the light fixtures themselves as well as light that is reflected off certain surfaces. As noted on the previous SPS athletic facility lighting projects, the use of taller light poles allows for more direct and steeper aiming angles which allows for the fixture shields to block more of the glare that is produced from the fixtures and minimize potential glare impacts. Some level of reflected glare could also occur from light reflected from the playing surfaces; however, the use of fixture shielding can also help to minimize the amount of reflected glare. Other site-specific features such as topography, existing trees and vegetation or existing onsite buildings can also serve to minimize and block reflected glare.

System Repair and Maintenance Projects

System repair and maintenance projects under Alternative 2 would occur within the existing footprint of SPS facilities and would not be anticipated to result in operational aesthetic, light or glare impacts.

Cumulative Impacts

To the extent that potential projects under the BEX VI Capital Levy Program occur in the vicinity of other development projects, it could result in a cumulative change in aesthetic character or add potential new sources of light and glare. However, SPS's potential project sites are already located within urbanized areas of the City of Seattle that are already highly developed. With adherence with applicable City zoning requirements and standards, as well as implementation of mitigation measures, it is anticipated that no significant cumulative aesthetic, light or glare impacts would occur.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Construction Impacts

Similar to Alternative 2, construction-related impacts for potential projects under Alternative 3 that could affect surrounding aesthetic conditions would typically include temporary changes to aesthetic character related to construction staging and materials/equipment storage, vegetation clearing, and the increased presence of construction vehicles,

equipment, workers and materials. The staging of materials and equipment storage could also result in temporary obstruction of some views surrounding the potential project sites; however, these impacts from staging would be temporary and not anticipated to be significant. It is anticipated that these construction impacts would be similar but at a lower level than Alternative 2 since no replacement schools or new buildings on new site projects would be provided.

Operation Impacts

Under Alternative 3, the potential BEX VI Capital Levy Program would result in similar types of operational aesthetic, light and glare impacts as those identified for Alternative 2. However, since there would be no replacement school projects or new buildings on new site projects under Alternative 3, it is anticipated that there would be less potential for changes to aesthetic character (e.g., increased height, bulk and scale) that would be associated with those types of potential projects on specific sites. Alternative 3 assumes that two additional modernization/addition projects at Bailey Gatzert ES and the Skills Center would occur. These assumptions for Alternative 3 would result in additional aesthetic, light and glare impacts from modernization and addition projects when compared to Alternative 2, but such impacts at Bailey Gatzert ES and the Skills Center would be anticipated to be lower than what could occur with the replacement school and new buildings at new site projects for those sites that are identified under Alternative 2.

Potential aesthetic, light and glare impacts under Alternative 3 for building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects would be the same as described for Alternative 2.

Cumulative Impacts

Alternative 3 would be anticipated to have the potential for similar types of cumulative aesthetics, light and glare impacts as Alternative 2, but at a lower level since there would be no replacement school or new buildings on new site projects.

3.6.3 Mitigation Measures

The following mitigation measures have been identified to further reduce the potential for aesthetic, light, and glare impacts associated with potential projects in the BEX VI Capital Levy Program under the EIS Alternatives:

Construction

Subsequent to construction activities, SPS would restore staging areas at potential
project sites and replant vegetation that was removed as part of construction
activities, as necessary and in accordance with applicable City of Seattle
requirements.

Operation

- Potential changes in aesthetic character, including increases in height, bulk and scale, would be minimized through project-specific design strategies such as the position/orientation of a building on the site; limits to overall building height; modifications to building bulk; modifications to setbacks; modifications to building façade details; and, implementation of landscaping. Specific measures to minimize aesthetic impacts at individual sites would be identified during the project-specific design process and environmental review, as appropriate.
- Lighting associated with potential building development projects would be designed
 to minimize light spill and light trespass and would comply with the applicable lighting
 standards and requirements of the City of Seattle, including SMC 23.45.570. Specific
 measures to minimize light impacts on individual sites would be identified during the
 project-specific design process and environmental review, as appropriate.
- Potential new athletic facility lighting would be designed to minimize light and glare impacts through the use of increased pole heights, light fixture shields, and use of LED light technology. Consistent with SMC 23.51B.002(D)(6), a special exemption for height could be applied to allow for increased light pole heights which has been proven to help minimize spill light, light trespass and glare on previous SPS athletic field lighting projects. Specific measures to minimize light and glare impacts on individual sites would be identified during the project-specific design process and environmental review, as appropriate.
- The use of fully programmable control systems for potential new athletic facility lighting projects would allow for lights to be on when scheduled for use and remain off when not scheduled in advance. It would also allow lights to be turned off when athletic facility activities are completed (typically no later than 10:00 PM).

3.6.4 Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse aesthetic, light or glare impacts are anticipated to result from implementation of the potential projects included in the BEX VI Capital Levy Program. As appropriate, project-specific environmental review will be prepared for individual projects included in the BEX VI Capital Levy Program and additional site-specific information about potential aesthetic, light and glare impacts would be further assessed at that time. With appropriate mitigation for each site, significant adverse aesthetic, light, and glare impacts are not anticipated.

3.7 RECREATION

This section of the Final Programmatic EIS (FPEIS) describes existing recreation conditions for the potential sites identified in the BEX VI Capital Levy Program and evaluates potential impacts that could occur as a result of development of the BEX VI Capital Levy Program under the EIS Alternatives. SPS will conduct phased environmental review for projects under the BEX VI Capital Levy Program. Project-specific environmental review will be completed, as appropriate, for individual projects when the District begins project-specific planning, design and construction activities.

3.7.1 Affected Environment

Existing Conditions

SPS schools generally include a variety of recreational features as part of their overall site amenities. Elementary schools typically have playgrounds and play equipment spaces, hard surface play areas, play fields and in some cases, covered play area structures for younger students. Middle schools and high schools generally include athletic fields for scholastic sports use (soccer, softball, baseball, football, ultimate Frisbee, lacrosse, etc.) and Physical Education (P.E.) classes; in some cases, running tracks and/or tennis courts are also provided. Gymnasiums are also included as part of the onsite building space to provide indoor recreation opportunities and use by P.E. classes. These recreation facilities are utilized by students during the school day and for after-school programs and sports teams. They are also available for public use during non-school hours and when not reserved for use by their respective schools.

In addition to onsite recreation areas and facilities, several potential sites identified in the BEX VI Capital Levy Program are located adjacent to existing City of Seattle parks and recreation facilities. These City facilities are generally available for use by SPS as part of their Joint Use Agreement with the City of Seattle Parks and Recreation Department (SPR). Further information on the Joint Use Agreement is provided later in this section. Existing City of Seattle park and recreation facilities that are adjacent to potential SPS project sites that are identified in the BEX VI Capital Levy Program are summarized below in **Table 3.7-1**.

Table 3.7-1 SPR PARKS/RECREATION FACILITIES ADJACENT TO BEX VI PROGRAM PROJECT SITES

| SPS Site Location | Adjacent SPR Park/Recreation Facilities | | | |
|---|---|--|--|--|
| Replacement School or New Building at New Site Projects | | | | |
| Bailey Gatzert ES | None | | | |
| Sacajawea ES | Sacajawea Playground | | | |
| Whitman MS | Soundview Playfield | | | |
| Seattle World School (T.T Minor School) | T.T. Minor Playground | | | |
| Modernization or Addition Projects | | | | |
| Lowell ES | None | | | |
| STEM K-8 at Louisa Boren | None | | | |
| Aki Kurose MS | Brighton Playfield | | | |
| Franklin HS | None | | | |
| Chief Sealth International HS | Southwest Pool | | | |
| West Seattle HS | Hiawatha Playfield | | | |
| Interagency HS (Columbia School) | Columbia Park | | | |
| Interagency HS (Roxhill Site) | Roxhill Park | | | |
| Van Asselt Interim Site | Van Asselt Playground | | | |
| John Marshall Interim Site | None | | | |
| Athletic Fields Projects | | | | |
| Salmon Bay K-8 | None | | | |
| Eckstein MS | None | | | |
| Whitman MS | Soundview Playfield | | | |
| Robert Eagle Staff MS | None | | | |
| Denny MS/Chief Sealth HS Athletic Fields | Southwest Pool | | | |
| Franklin HS | None | | | |
| Roosevelt HS | None | | | |
| Van Asselt Interim Site | Van Asselt Playfield | | | |
| Lighting Projects | | | | |
| Eckstein MS | None | | | |
| Jane Addams MS | None | | | |
| Ingraham HS | Madison Pool | | | |

3.7-2

| SPS Site Location | Adjacent SPR Park/Recreation Facilities | |
|---|---|--|
| Chief Sealth HS Athletic Fields | Southwest Pool | |
| Ballard HS | Ballard Pool | |
| Play Area Surface Conversion Projects | | |
| Leschi ES | Peppi's Playground | |
| Genesee Hill ES | None | |
| Bryant ES | None | |
| Gatewood ES | None | |
| Concord ES | None | |
| Site Improvement Projects | | |
| Wedgewood ES | None | |
| Stevens ES | None | |
| Dearborn Park ES | Dearborn Park | |
| Arbor Heights ES | None | |
| STEM K-8 at Louisa Boren | None | |
| Madison MS | None | |
| Nathan Hale HS | Meadowbrook Playfield | |
| Cascade Parent Partnership (at North Queen Anne School) | Queen Anne Bowl Playfield | |

Source: Seattle Public Schools and City of Seattle, 2024.

SPS and City of Seattle Joint Use Agreement

As noted in **Table 3.7-1**, many SPS school sites are located adjacent to or proximate to SPR sites and facilities. SPS and SPR have worked together since the 1920s in planning and jointly using their separately owned sites and facilities. SPS and SPR initially entered into a Joint Use Agreement in 1995 which established the guidelines for the joint use of SPS and PR sites and facilities, as well as established the procedures for cooperation between the two entities as well as encouraging joint ventures.

The most recent version of the Joint Use Agreement was adopted in 2022 and is effective through 2027 (SPS and SPR, 2022). The purposes of the Agreement include the following objectives:

- Increasing youth and community access to SPS facilities and grounds.
- Increasing student access to SPR facilities and grounds.
- Encouraging third-party recreational activities involving SPS and SPR.

 Working together to jointly use SPS and SPR facilities to support school children and residents during times of catastrophic emergencies for sheltering, recovery of services and resumption of school.

As part of the Joint Use Agreement, all SPS recreation facilities are available for scheduling and use by SPR when those facilities are not in use by their respective schools. Conversely, all SPR recreation facilities are also available for use by SPS once the programming needs of SPR have been fulfilled. The Agreement also outlines the procedures for scheduling, encourages joint and cooperative ventures (including facility maintenance and development), and equitably distributes the time and cost of the use of facilities.

SPS and City of Seattle Joint Athletic Facilities Development Program

In 1997, SPS and SPR created a Joint Athletic Facilities Development Program to identify and prioritize athletic facility development projects that would increase the athletic field playing capacity for youth and adult recreation uses. The most recent version of the Joint Athletic Facilities Development Program was completed in 2019. The 2019 Joint Athletic Facilities Development Program Update incorporates demographics and trends in sports participation, documents scheduled field usage, lighting inventories and usage, and goals and policies that guide athletic facility development. The 2019 Update identifies a list of future potential athletic facilities projects and is intended to inform and provide guidance on priorities for future SPS and SPR projects to improve and maintain athletic facilities and ensure equitable access to athletic facilities throughout the City of Seattle (SPR and SPS, 2019).

3.7.2 Impacts of the Alternatives

This section of the FPEIS identifies how the potential BEX VI Capital Levy Program under the EIS Alternatives would relate to recreation uses during construction and long-term operations. Potential impacts associated with air quality, noise, light and glare, transportation and environmental health are covered in **Section 3.1**, **Section 3.4**, **Section 3.6**, **Section 3.10**, and **Section 3.11**, respectively.

Alternative 1 - No Action Alternative

Under Alternative 1 – No Action Alternative, the BEX VI Capital Levy Program would not move forward, and no construction activities or associated construction-related impacts to recreation space would occur at SPS project sites. No upgrades to play areas or athletic fields would occur and the condition of play areas and athletic fields would likely deteriorate through continued use and normal wear and tear. With such continued use and no improvements, certain SPS athletic facilities could potentially be taken out of service due to deterioration.

To the extent that increased enrollment may occur, since public schools are obligated by law to accommodate additional students, a minor increase in student-related recreation demand would also occur for onsite recreation resources as well as any immediately adjacent SPR recreation facilities that might be utilized by specific schools.

If portable classroom buildings are required at certain site locations, the installation of those buildings could result in some potential displacement of recreation space on those sites. To the extent feasible, portable classroom building siting plans would be designed to minimize potential siting issues and the displacement of existing recreation space. Since such displacement would likely be minimized as part of the site design process, it is anticipated that the No Action Alternative would not result in any significant, unavoidable adverse recreation impacts.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Alternative 2 includes potential projects under the BEX VI Capital Levy Program that would be implemented at up to 42 sites around the District. These project types would include: major construction projects at up to 15 sites; athletic, playfield, and/or lighting improvements at up to 18 sites; and site improvements at up to 8 sites. The major construction projects could consist of school building replacements, new buildings at new sites, modernization and additions, building reconfigurations, and systems repair and replacement projects. The athletic facility and playfield improvements primarily would involve turf replacements, conversions to synthetic turf, and/or facility lighting installations and upgrades. This section analyzes the range of potential impacts that can result from each project type under Alternative 2. The analysis is presented at a planning level of detail consistent with a programmatic analysis. SPS will conduct appropriate project-level environmental analysis (including recreation) for each project when sufficient project-level details are available.

Construction Impacts

The following describes potential recreation impacts that could occur during the construction of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement School and New Buildings on New Site Projects

Under Alternative 2, potential replacement schools and new buildings at new site projects would result in temporary construction activities that would affect existing onsite recreation areas. Existing recreation areas would be closed for safety during the construction process on potential development sites. Depending on the specific design for individual sites, existing recreation uses could be removed and replaced in a new location as part of the development process for replacement schools and new buildings on new sites.

For potential sites that are located adjacent or proximate to existing City of Seattle parks and recreation facilities, temporary construction activities could also affect users of those facilities through construction noise, air quality emissions, and traffic/parking in the site vicinity. Construction-related impacts associated with those environmental elements are discussed in detail in **Section 3.1**, Air Quality; **Section 3.4**, Noise; and **Section 3.10**.

Transportation. Mitigation measures identified in those sections would minimize the potential for construction-related impacts.

Modernization and Addition Projects

Construction activities for modernization projects would be located almost entirely within existing buildings and would not be anticipated to displace existing outdoor recreation uses. However, to the extent that a modernization project includes construction activities to an existing gymnasium it would result in the temporary closure of that facility during the construction process.

Potential building addition projects under Alternative 2 would include construction activities on project sites that would likely necessitate the need to temporarily close existing onsite recreation areas due to safety considerations. It is also possible that onsite recreation areas could be removed (and later replaced) with construction activities depending on the site and project-specific building design location. Depending on the extent of construction activities for potential modernization and addition projects it could also result in temporary disturbance for onsite and adjacent recreation areas due to construction noise, air emissions and traffic/parking.

Building Reconfiguration Projects

Construction-related impacts to recreation uses from building reconfiguration projects would be similar to or less than the impacts identified with modernization projects discussed above since construction activities would be located almost entirely within the existing buildings. In the event that a reconfiguration project involves a school gymnasium, it would result in the temporary closure of that recreation space during the construction process.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Construction activities for potential athletic field and play area projects under Alternative 2 (e.g., synthetic turf replacement or conversion to synthetic turf) would result in temporary closure of those facilities during the construction process. Site improvement projects could also result in temporary closure of recreation uses on specific sites depending on the extent and location of construction activities for each specific project. To the extent that new lighting projects would be installed around the perimeter of existing athletic facilities, it is anticipated that those facilities could have more limited disruption. As practical, athletic field, play area, site improvement and lighting projects would be planned and scheduled to limit disruptions as feasible.

System Repair and Maintenance Projects

Construction-related recreation impacts for system repair and maintenance projects would be similar to or less than those impacts associated with modernization and building reconfiguration projects discussed above. To the extent that a system repair or maintenance project involves a school gymnasium it would result in the temporary closure of that recreation space during the construction process.

Operation Impacts

The following describes potential recreation impacts that could occur with the operation of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement School and New Buildings on New Site Projects

Potential replacement schools and new buildings on new site projects under Alternative 2 would generally include the demolition/removal of existing facilities on specific sites (including existing recreation areas/facilities) in order to accommodate the replacement school or new building. Development of replacement schools and new buildings could potentially result in more building area on site and less recreation areas, but it would also allow SPS to provide updated recreation equipment and to incorporate recreation areas into the potential project. As part of the design process, replacement schools or new buildings would typically include the provision of recreation space to the maximum extent feasible given site-specific conditions and also provide new equipment for student use and new gymnasiums. The potential for increased student capacity as part of the projects would also result in increased demand for recreation space and facilities on site. In the event that specific sites are located adjacent to SPR facilities (e.g., Sacajawea ES, Whitman MS, and World School at T.T. Minor), those facilities could also experience increased use by students during the day and after school. Increased use of SPR facilities would not necessarily be considered a negative impact but it could be noticeable for other community users of those specific parks.

Modernization and Addition Projects

Potential modernization projects would generally involve improvements to existing SPS buildings and would not be anticipated to displace any existing outdoor recreation amenities. If a modernization project were to involve potential upgrades to gymnasium space on a specific site it would be anticipated to provide an enhanced and more usable indoor recreation space for students.

Depending on specific site conditions and potential project-specific designs, building addition projects under Alternative 2 could result in some level of displacement of existing outdoor recreation space. Project-specific designs would attempt to minimize the loss of outdoor recreation space to the extent feasible and also look for opportunities to provide upgraded outdoor recreation space and/or equipment on the site. To the extent that potential building addition projects include new or upgraded gymnasium space at a school, it would also create an enhanced recreation space for students at that site.

Modernization and addition projects could also result in increased student capacity at specific sites which would result in increased demand for recreation space and facilities on site. In the event that specific sites are located adjacent to SPR facilities (e.g., Aki Kurose MS, Chief Sealth HS, West Seattle HS, Interagency HS and Van Asselt Interim Site), those facilities could also experience increased use by students during the day and immediately after school. Increased use of SPR facilities would not necessarily be considered a negative impact but it could be noticeable for community users of the parks.

Building Reconfiguration Projects

Building reconfiguration projects would be implemented in existing facilities to better accommodate SPS program elements or changes to student needs. These projects would not result in recreation impacts unless a potential reconfiguration project affects gymnasium space at a specific site. In such a case, a reconfiguration of gymnasium space would be anticipated to create a more usable and accessible recreation amenity for students.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Potential athletic field improvements, play area improvements and lighting projects with the BEX VI Capital Levy Program under Alternative 2 would provide enhanced recreation space and facilities for student and community use. The replacement or installation of new synthetic turf at athletic fields and play areas would create more usable and durable outdoor recreation space for users and provide opportunities for more extended use of those facilities (refer to **Section 3.11**, Environmental Health, for further details on synthetic turf surfaces).

The provision of athletic facility lighting would allow SPS to extend the use of its facilities for students and create additional opportunities for use by SPR and the community. Athletic facility lighting would allow facilities to be scheduled for extended use later into the evening, particularly during the late Fall through early Spring, and create more opportunities for student and community recreation activities. New and upgraded lighting would also provide increased safety for facility users (refer to Section 3.6, Aesthetics/Light and Glare, for further details on athletic facility lighting).

The provision of athletic field improvements, play area improvements and athletic facility lighting would help to meet the goals and objectives of the Joint Use Agreement and the Joint Athletic Facilities Development Program. SPS would continue to coordinate with SPR regarding the use and scheduling of its facilities with the potential improvements.

System Repair and Maintenance Projects

System repair and maintenance projects under Alternative 2 would generally occur within existing buildings and would not be anticipated to result in recreation impacts.

Cumulative Impacts

While potential projects assumed for Alternative 2 under the BEX VI Capital Levy Program could result in some level of displacement of recreation space and increased demand associated with additional students, it also includes opportunities to provide new and enhanced recreation space and facilities at SPS sites. Replacement schools, modernization and addition projects would include design opportunities to incorporate new outdoor recreation space and/or new and enhanced gymnasiums. Athletic field improvements, play area improvements and athletic facility lighting would provide upgraded outdoor recreation space and opportunities to allow for extended use of recreation facilities by SPS, SPR and the community. As a result, cumulative recreation impacts are not anticipated.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Construction Impacts

Under Alternative 3, no school replacement projects or new buildings on new site projects are identified and as such construction-related impacts associated to recreation facilities on those sites would not occur when compared to Alternative 2. Construction-related recreation impacts for modernization and addition projects would be anticipated to be similar to Alternative 2; however, Alternative 3 includes two additional modernization and addition projects at Bailey Gatzert ES and the Skills Center. These assumptions for Alternative 3 would result in additional construction-related impacts from modernization and addition projects when compared to Alternative 2, but such impacts at Bailey Gatzert ES and the Skills Center would be anticipated to be lower than what could occur with the replacement projects for those sites that are identified under Alternative 2.

Construction-related recreation impacts for building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects would be the same as Alternative 2.

Operation Impacts

The BEX VI Capital Levy Program under Alternative 3 would result in similar types of operational recreation impacts as those identified for Alternative 2; however, the level of impacts would be lower since there would be no school replacement projects and associated increases in student demand and use under Alternative 3.

Operational recreation impacts would be the same as Alternative 2 for building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects.

Cumulative Impacts

Cumulative impacts for Alternative 3 would be anticipated to be similar to those described above for Alternative 2.

3.7.3 Mitigation Measures

The following mitigation measures have been identified to further reduce the potential for recreation impacts associated with the potential BEX VI Capital Levy Program projects under the EIS Alternatives:

Construction

- Potential projects under the BEX VI Capital Levy Program would comply with applicable City of Seattle requirements to minimize construction impacts that could affect adjacent recreation uses. Mitigation measures for construction-related noise, air quality and transportation are discussed in detail in Section 3.1, Air Quality; Section 3.4, Noise; and Section 3.10, Transportation.
- To the extent feasible, the development of potential athletic field improvements and play area improvements (e.g., synthetic turf replacement or new synthetic turf) would be scheduled during the summer months to minimize potential conflicts and disruption of school uses.

Operation

- The BEX VI Capital Levy Program includes several potential projects that would provide opportunities for new and enhanced recreation space/facilities, as well as opportunities for improvements that would expand the use of existing facilities for SPS students and the community.
- As part of the project-specific design process, SPS would strive to minimize the
 displacement and disruption to existing onsite recreation uses while also looking for
 opportunities to provide new and enhanced recreation space and recreation
 equipment to the maximum extent feasible.
- Mitigation measures for operational impacts related to air quality, noise, light and glare, transportation and environmental health are discussed in Section 3.1 Air Quality, Section 3.4 Noise, Section 3.6 Aesthetics/Light and Glare, Section 3.10 Transportation, and Section 3.11 Environmental Health.

3.7.4 Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse recreation impacts are anticipated to result from implementation of the potential projects included in the BEX VI Capital Levy Program. Appropriate project-specific environmental review will be prepared for individual projects included in the BEX VI Capital Levy Program and additional site-specific information about potential recreation impacts would be further assessed at that time. With appropriate mitigation for each site, significant adverse recreation impacts are not anticipated.

3.8 CULTURAL RESOURCES

This section of the Final Programmatic EIS (FPEIS) describes existing cultural resource conditions for the potential sites identified in the BEX VI Capital Levy Program and evaluates potential impacts that could occur as a result of development of the BEX VI Capital Levy Program under the EIS Alternatives. SPS will conduct phased environmental review for projects under the BEX VI Capital Levy Program. Project-specific environmental review will be completed, as appropriate, for individual projects when the District begins project-specific planning, design and construction activities.

3.8.1 Affected Environment

This section describes known cultural resources, including archaeological sites in or near Seattle Public Schools properties that are being considered for the BEX VI Capital Levy Program. It also describes the existing, pertinent state and local regulations that govern the treatment of archaeological resources.

Archaeological Sites

Cultural resources assessments have been completed for previous SPS projects at seven of the facilities potentially included in the BEX VI Capital Levy Program (see **Table 3.8-1**). The majority of these did not identify any archaeological sites but several identified elevated potentials for archaeological sites to be present within the project area and recommended archaeological monitoring. Only one investigation resulted in the identification of a previously unknown cultural resource. Prior to construction of Genesee Hill Elementary, historical research indicated there was a high potential for buried cultural resources in a portion of the project area and subsequent excavation of trenches in this area identified concrete, fragments of window glass, brick, iron, copper pipe, and tar paper associated with two early 20th century residential structures that were on the property prior to 1950. These resources that were identified during previous investigations were recorded with the Washington State Department of Archaeology and Historic Preservation (DAHP) as 45KI1186 and 45KI1187.

Table 3.8-1
PREVIOUS CULTURAL RESOURCES INVESTIGATIONS OF POTENTIAL BEX VI
SITES

| Author | Date | Project | Results* |
|-------------------------|------|--|----------|
| Valentino and Wilson | 2017 | Whitman Middle School Athletic Field Lighting Project, Cultural Resources Assessment, Seattle, King County, WA | None |
| Lockwood and Hoyt | 2016 | Wilson Pacific Elementary and Middle Schools Project – Results of Archaeological Probing** | None |

| Author | Date | Project | Results* |
|---------------------------|------|--|-------------------------------------|
| Valentino et al. | 2017 | Ballard High School Athletic Field Lighting, Cultural Resource Assessment, Seattle, King County, WA | None |
| Schultze and Little | 2015 | Archaeological Monitoring for Seattle Public Utilities' Thornton Creek Confluence Improvement Project, City of Seattle, King County, Washington. | 45KI1226- not on SPS property |
| Valentino et al. | 2017 | Roosevelt High School Athletic Field Lighting, Cultural Resource Assessment, King County, WA | None |
| Wilson and Lockwood | 2014 | New elementary school at Genesee Hill, Seattle, Washington: Cultural Resource Assessment | 45KI1186 45KI1187 |
| Peterson and Shrikanth | 2023 | Cultural Resources Assessment for the Van Asselt Interim School Athletic Field Lighting Project | None |
| Johnson and Peterson | 2021 | Cultural Resources Assessment for Van Asselt School, Seattle, Washington | None |
| Johnson | 2022 | Results of Archaeological Monitoring at Van Asselt Elementary School, Seattle, King County, Washington | None |

^{*}Newly recorded cultural material identified within the project area.

Archaeological resources dating to the pre- or post-contact periods may be present below the modern surface within the proposed project sites. Native American histories indicate that ancestral peoples have lived in the Pacific Northwest since time immemorial and archaeological evidence supports the deep antiquity of Native peoples in the region by providing material evidence for the local presence of ancestral peoples before 12,000 years ago. Since humans have lived in and traveled throughout the City of Seattle and its environs for over 10,000 years, there are few, if any, locations in the city that have not seen human activity. However, a natural setting exerts a strong influence over whether an archaeological site is likely to have formed in any given location. Overall, the potential of a given project site to contain buried archaeological resources varies depending on geologic setting, depositional history, proximity to freshwater and other resources, and its history of development and ground disturbance.

Archaeological sites are most likely to be found in locations where surficial geology consists of Holocene-aged deposits because accumulation of sediment during the period of regional human occupation is more likely to lead to the preservation of the material traces of human activity. Cultural material deposited in areas lacking Holocene-aged deposits is less likely to have been preserved as an archaeological site. Where they do form, archaeological sites in areas with Pleistocene-aged surficial geology will be shallowly buried by fill sediment and

^{**}Now Robert Eagle Staff.

therefore, more likely to have been disturbed or removed by development activity in the historic and modern eras.

Table 3.8-2 summarizes the surficial geologic units mapped in project locations that are under consideration for the BEX VI Capital Levy Program and the mapped surficial geology for each potential site is listed in **Table 3.8-3**. The majority of the potential project locations are mapped as Pleistocene glacial deposits.

Table 3.8-2
SUMMARY OF GEOLOGIC UNITS MAPPED IN POTENTIAL BEX VI PROGRAM
PROJECT SITES

| Geologic Unit | Lithology | Geologic age | Archaeological potential |
|---------------|---|----------------------|--|
| OEn | Nearshore sedimentary rocks | Oligocene- Eocene | Low |
| Qgt | Fraser-age glacial till | Pleistocene | Moderate-near surface only |
| Qga | Fraser-age advance glacial outwash | Pleistocene | Low—near surface only |
| Qgo | Fraser-age glacial outwash | Pleistocene | Moderate-near surface only |
| Qgpc | Pre-Fraser glacial drift and non glacial deposits | Pleistocene | Low—near surface only |
| Qf | Artificial fill and modified land | Holocene | Moderate—post-contact sites |
| Qa | Quaternary Alluvium | Holocene | High—potential for deeply buried sites |

In general, the presence of recorded archaeological sites in close proximity to a given project indicates higher archaeological sensitivity since it demonstrates previous human activity in the area and shows that conditions favorable to the accumulation and preservation of archaeological sites exists nearby. Archaeological sites have been recorded within or in close proximity to several potential project sites and are indicated in **Table 3.8-3**. In addition, **Table 3.8-3** summarizes the surficial geology for each potential site, as well as the potential risk to encounter cultural resources based on DAHP's archaeological predictive model. This model is a statewide planning tool that uses statistical modeling of environmental factors such as soil, distance to water and slopes to provide a high-level estimate on the likelihood that a site may have potential cultural resources. For sites that are indicated as moderate risk or higher, DAHP recommends that a site-specific cultural resource study be completed for potential projects as part of project-specific planning and environmental review.

Table 3.8-3
POTENTIAL ARCHAEOLOGICAL SENSITIVITY OF POTENTIAL BEX VI SITES

| School | DAHP Predictive Model | Distance to Closest Recorded Site | Age of Closest Recorded Site | Surficial Geology |
|-------------------------------|-----------------------------|--|--|----------------------|
| Elementary Schools | | | | |
| Arbor Heights ES | High Risk | 0 miles | 20 th century | Qga |
| Bailey Gatzert ES | High Risk | 0.12 miles | 20 th century | Qgt |
| Bryant ES | High Risk | 0.65 miles | 20 th century | Qgt |
| Concord ES | Very High Risk | 0.5 miles | Precontact | Qgo |
| Dearborn Park ES | Moderate Risk | 0.84 miles | 19 th -20 th century | Qgt |
| Gatewood ES | Very High Risk | 0.27 miles | 20 th century | Qga |
| Genesee Hill ES | Moderate to High Risk | 0 miles | 20th century | Qga |
| Leschi ES | Moderate Risk | 0.47 miles | 20 th century | Qga |
| Lowell ES | Low to Moderate Risk | 0.32 miles | 19 th -20 th century | Qgt |
| Sacajawea ES | High Risk | 1 mile | 20 th century | Qgpc |
| Stevens ES | Moderate to High Risk | 0.7 miles | 20 th century | Qgt |
| Wedgwood ES | High Risk | 0.51 miles | Unknown | Qgt |
| K-8 Schools | | | | |
| Cascade Parent Partnership | Moderate to High Risk | 0.44 miles | 20 th century | Qga |
| Louisa Boren STEM K-8 | High Risk | 0.84 miles | Precontact | Qgo |
| Salmon Bay K-8 | High Risk | 0.7 miles | 20 th century | Qgt |

| School | DAHP Predictive Model | Distance to Closest Recorded Site | Age of Closest Recorded Site | Surficial Geology |
|---|-----------------------------|--|--|----------------------|
| Middle Schools | | | | |
| Aki Kurose MS | Low to High Risk | 1.05 miles | 19 th -20 th century | OEn |
| Eckstein MS | High Risk | 960 ft | Unknown | Qgpc |
| Jane Addams MS | Very High Risk | 940 ft | 20 th century | Qgo |
| Madison MS | High to Very High Risk | 0.5 miles | 20 th century | Qga |
| Robert Eagle Staff MS | High Risk | 0.55 miles | 20 th century | Qgt |
| Whitman MS | High to Very High Risk | 1.97 miles | 19 th -20 th century | Qgt |
| Denny MS/ Chief Sealth HS Athletic Fields | Very High to High Risk | 0.25 miles | Precontact | Qf |
| High Schools | | | | |
| Ballard HS | High Risk | 0.78 miles | 20 th century | Qgt |
| Chief Sealth International HS | High to Very High Risk | 0.3 miles | Precontact | Qf |
| Franklin HS | Very High | 275 ft | 20 th century | Qgt |
| Ingraham HS | Low Risk | 1.5 miles | 20 th century | Qgt |
| Interagency HS (Roxhill) | High Risk | 0.7 miles | 20 th century | Qgo |
| Interagency HS (Columbia) | Moderate to High Risk | 0.82 miles | 20 th century | OEn |
| Nathan Hale HS | Very High Risk | 270 ft | 20 th century | Qa |
| Roosevelt HS | High Risk | 0.71 miles | 20 th century | Qgt |
| Seattle World School HS (Gym) | Low to Moderate Risk | 0.41 miles | 19 th -20 th century | Qgt |
| West Seattle HS | High to Very High Risk | 0.6 miles | Precontact | Qga |

| School | DAHP Predictive Model | Distance to Closest Recorded Site | Age of Closest Recorded Site | Surficial Geology |
|-------------------------------|-----------------------------|--|--|----------------------|
| Interim Sites | | | | |
| John Marshall Interim Site | High Risk | 0.3 miles | 20 th century | Qgt |
| Van Asselt Interim Site | High Risk | 0.22 miles | 19 th -20 th century | Qgt |

Source: DAHP, 2024.

Applicable Regulations

Any project using federal funding or requiring a permit from a federal agency would be subject to Section 106 of the National Historic Preservation Act (Section 106). Section 106 requires federal agencies to identify and assess the impacts of federal actions on historic resources and requires consultation with affected tribes and other interested parties. Although responsibility for Section 106 compliance rests with the lead federal agency, consultation may be delegated in some circumstances. Federal permitting often requires the applicant to complete a cultural resources assessment for their proposed project. In the event that federal funding or permitting is required for a specific project, Section 106 requirements would be addressed as part of project-specific planning and project-specific environmental review once those specific funding sources are identified for a potential project. The BEX VI Capital Levy Program is not anticipated to involve any federal funding, permitting or licensing and as such, Section 106 would not apply.

Many potential projects under the BEX VI Capital Levy Program will be partially funded by State grants and therefore subject to Governor's Executive Order 21-02 (GEO 21-02). GEO 21-02 requires state agencies using state capital funds for new construction, demolition, ground disturbance, rehabilitation/renovation, and acquisition to consider potential project impacts on cultural resources, including built environment resources, archaeological sites, and traditional cultural places (TCPs). Compliance with GEO 21-02 requires consultation with the DAHP and affected tribes and State agencies like OSPI may delegate consultation to recipients of state funds like SPS. Compliance with GEO 21-02 will require consultation and project level review of impacts for many of the potential projects for the BEX VI Capital Levy Program. Once specific funding sources are identified for a potential project, compliance with GEO 21-02 would be reviewed, as necessary, as part of project-specific planning and project-specific environmental review.

Potential projects that are entirely Levy-funded may not be subject to GEO 21-02 but would be subject to review under the State Environmental Policy Act (RCW 43.21C, 197-11 WAC). Seattle School Board Policy 6890 establishes SPS compliance with SEPA. SPS projects requiring a Master Use Permit (MUP) are also subject to the Seattle SEPA rules (SMC 25.05.675H) and Landmarks Preservation Ordinance (SMC 21.12).

Multiple Washington State laws address archaeological sites and Native American burials. The Archaeological Sites and Resources Act (RCW 27.53) prohibits knowingly excavating or disturbing prehistoric and historic archaeological sites on public or private land without a permit from DAHP. The Indian Graves and Records Act (RCW 27.44) prohibits knowingly destroying American Indian graves. In the event of inadvertent disturbance through construction or other activities, human remains and artifacts from American Indian graves must be re-interred under supervision of the appropriate Indian Tribe. Additionally, RCW 42.56.300 exempts all records, maps, or other information identifying the location of archaeological sites, historic sites, artifacts, or sites of traditional, ceremonial, or social uses and activities of Indian Tribes from disclosure in order to prevent the looting or depredation of sites.

3.8.2 Impacts of the Alternatives

This section of the FPEIS identifies how the potential BEX VI Capital Levy Program under the EIS Alternatives would impact cultural resources during construction and long-term operations.

Alternative 1 - No Action Alternative

The No Action Alternative would avoid all potential impacts to cultural resources by eliminating construction activities associated with potential projects under the BEX VI Capital Levy Program, including demolition and ground disturbance with the potential to impact buried cultural resources. To the extent that increased enrollment may occur, since public schools are obligated by law to accommodate additional students, portable classroom buildings could be required at certain site locations. In the event that portable classroom buildings are necessary for a specific site, it would be anticipated that such buildings would be located in previously disturbed and paved areas and that the level of excavation would be minimal (e.g., potential shallow excavations for utility connections). As a result, it is anticipated that the No Action Alternative would not result in any significant, unavoidable adverse impacts to cultural resources.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Construction Impacts

Replacement Schools and New Buildings at New Site Projects

Alternative 2 proposes four school replacement projects and construction of one building on a new site. Overall, these project types present the greatest potential to adversely impact cultural resources due to larger footprints and likely greater depths of ground disturbance. Projects would be assessed individually, and a monitoring plan or inadvertent discovery plan would be prepared for projects with elevated potential to impact buried cultural resources. If individual assessment or construction monitoring resulted in the identification of an archaeological site, a permit from the DAHP would be required prior to excavation within the site boundary.

The cultural resource assessment for the Whitman Middle School Athletic Field Lighting Project demonstrated a generally low potential for buried cultural resources in the vicinity of the athletic fields but limited potential in some areas where weathered glacial till underlies fill (Valentino and Wilson 2017).

The remaining three school replacement project locations have not been assessed for cultural resources but include two sites classified as High Risk in the DAHP's statewide predictive model and one classified as Low to Moderate Risk. Mapped surface geology of most sites is Pleistocene-aged glacial units, indicating that deeply buried sites are unlikely unless thick artificial fill deposits are present. In these settings previous construction and grading may have already removed or disturbed archaeological sites. Since sites are likely to be shallowly buried if native deposits are present at the surface, greater depth of ground disturbance does not necessarily increase potential for adverse impacts to archaeological sites but greater horizontal extent of ground disturbance would increase the likelihood of impacts.

Modernization and Addition Projects

Alternative 2 proposes several modernization and addition projects. Construction impacts for modernization and addition projects may include ground disturbing activities such as excavation, trenching, grading, and tracking of heavy machinery with the potential to disturb archaeological sites, if present.

The cultural resources assessment for the Van Asselt Interim Site indicated a relatively low potential for buried precontact cultural resources due to evidence of extensive previous grading on the site but remnants of post contact structures could be buried in the vicinity of the 1950 building (Johnson and Peterson 2021).

Many of the proposed modernization and addition projects are in areas classified as High or Very High Risk in the DAHP's statewide model. Lowell Elementary, Aki Kurose Middle School and Interagency High School (Columbia) are classified as Low to Moderate Risk. Like the school replacement projects, most Modernization and Addition Projects are located on glacial landforms where mapped surface geology is of Pleistocene age.

Building Reconfiguration Projects

Alternative 2 includes building reconfiguration projects for Skill Center sites. Specific sites have not been identified for these projects, but it is expected that these types of projects would involve little ground disturbance and therefore have a low potential to impact buried cultural resources.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Athletic Field and Play Area Projects

Potential athletic field projects proposed for the BEX VI Capital Levy Program include synthetic turf replacement and equipment replacement at a number of sites. Several elementary school play areas will also be converted from grass or pavement to synthetic

turf. Construction impacts for these projects include demolition of asphalt surfaces or grass, or removal of existing turf and grading.

Demolition and grading activities have the potential to impact buried archaeological sites in project areas that lack fill deposits or extensive previous grading that would have removed shallowly buried archaeological sites on glacial landforms. Cultural resources assessments have been completed within the last 10 years for other projects at four of these facilities. Investigations at Van Asselt Interim Site and Whitman Middle School are described above.

The Cultural Resources Assessment for an athletic field lighting project at Roosevelt High School included archaeological monitoring of geotechnical borings and did not identify any buried cultural material. Additionally, fill deposits were observed to directly overlie unweathered glacial sediments in all borings. The absence of soil A or B horizons across the property suggests the area was previously graded removing the shallow portion of the Pleistocene glacial deposit with moderate potential to contain archaeological sites.

A Cultural Resources Assessment for the Wilson-Pacific Elementary and Middle School Project included the area that is now Robert Eagle Staff Middle School. Review of geotechnical borings indicated localized Holocene alluvium within the project area with the potential to contain archaeological sites. However, archaeological probing after demolition did not identify an archaeological site and documented evidence of previous disturbance including incorporation of modern plastic and other debris into the buried Holocene deposits. Holocene deposits are, however, in the athletic field area and minimizing the depth of ground disturbance in this area during project planning and implementation will reduce the likelihood of impacts to cultural resources.

Lighting Projects

Proposed lighting projects involve installation of poles and trenching and installation of electrical conduits. Since the footprint of ground disturbance is relatively small for these activities, lighting projects generally have lower potential to impact cultural resources but trenching and pole installation could potentially disturb archaeological sites.

Site Improvements

Proposed site improvements include sidewalk and stormwater improvements, field retaining wall repair, field renovation, and other site development. These projects are unlikely to impact historic buildings but trenching for stormwater work can be deep and has the potential to impact archaeological sites. Improvements adjacent to Thornton Creek at Nathan Hale High School represent the only potential project under the BEX VI Capital Levy Program that is in a location where Holocene alluvium is mapped. Additionally, this area is classified as Very High Risk in the DAHP's statewide predictive model; Creekside locations like this were foci of human activity in both the pre- and post-contact periods due to the important resources that could be accessed there. A cultural resources assessment at the project-specific environmental review level should include subsurface testing for this high-

risk site area in order to identify any cultural resources present prior to the commencement of construction related ground disturbance.

System Repair and Maintenance Projects

Typical system repair and maintenance projects would not adversely impact cultural resources. Repair projects requiring ground disturbance would normally be within the horizontal and vertical extent of previous ground disturbance and therefore would not impact intact archaeological sites.

Operation Impacts

There would not be any operation impacts to cultural resources after construction is complete. Archaeological sites, if identified in the course of project-level review and construction, may be recorded and reburied or removed under a DAHP-issued permit. In either case, regular operations would not cause continuing impacts.

Cumulative Impacts

Since impacts to cultural resources would only occur during construction, there would also not be any cumulative impacts. A great deal of the information potential of archaeological sites resides in the spatial association between objects and strata. Once disturbed, most archaeological sites no longer have sufficient integrity to convey their significance, eliminating potential for cumulative impacts.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Construction Impacts

Replacement Schools and New Buildings at New Site Project

Alternative 3 eliminates impacts associated with the potential school replacement projects and new school construction. Some impact remains as the sites would be altered by modernization and addition. The scale of ground disturbance at the Bailey Gatzert Elementary School site would be smaller than in Alternative 2, reducing the potential for impacts to buried archaeological sites.

Three additional school replacement projects would not be included in Alternative 3. Ground disturbance with the potential to impact archaeological sites would be eliminated in one location classified as High to Very High Risk in DAHP's statewide predictive model, one location classified as High Risk, and one location classified as Low to Moderate Risk.

Modernization and Addition Projects

Alternative 3 adds the two potential modernization and addition projects discussed above. Otherwise, construction impacts for this project type would be the same as under Alternative 2.

<u>Building Reconfiguration Projects, Athletic Field, Play Area, Site Improvements and</u> <u>Lighting Projects</u>

Construction impacts for these project types would be the same as under Alternative 2.

System Repair and Maintenance Projects

Generally, impacts from system repair and maintenance projects would be similar to Alternative 2, however, since more aging schools will be maintained under Alternative 3, it is likely that more system repair and maintenance projects will be necessary, slightly increasing the potential for impacts to cultural resources.

Operation Impacts

Similar to Alternative 2, there would not be any operation impacts to cultural resources after construction is complete. Archaeological sites, if identified in the course of project-level review and construction, may be recorded and reburied or removed under a DAHP-issued permit. In either case, regular operations would not cause continuing impacts.

Cumulative Impacts

As under Alternative 2, impacts to cultural resources would only occur during construction and cumulative impacts would not be anticipated. A great deal of the information potential of archaeological sites resides in the spatial association between objects and strata. Once disturbed, most archaeological sites no longer have sufficient integrity to convey their significance, eliminating potential for cumulative impacts.

3.8.3 Mitigation Measures

Cultural resources assessments would be completed for most individual projects under the potential BEX VI Capital Levy Program and would include more detailed analysis of the potential for impacts to cultural resources. When field conditions allow, assessments would include subsurface testing or monitoring of geotechnical investigations as well as background research on geologic setting and historical land-use of individual project areas, and recommendations for project-specific mitigation measures.

SPS would also conduct government-to-government consultation for the majority of projects. This is required for all projects utilizing state capital funding for construction or acquisition under Governor's Executive Order 21-02 and is recommended for all projects involving substantial ground disturbance regardless of project funding. Tribal consultation can assist in identifying potential impacts early because area tribes possess historical knowledge that

is not available from published sources. When potential impacts are identified, tribal consultation can also identify mitigation measures.

Cultural Resources Mitigation

- For projects assessed as having a very high potential to adversely impact other cultural resources due to their unique natural or cultural setting, SPS would prepare a Monitoring and Inadvertent Discovery Plan (MIDP) and an archaeologist would actively monitor high risk construction ground disturbance. SPS would notify tribal representatives of the project schedule at least one week in advance of commencement of ground disturbance. Tribal representatives may also conduct site visits to observe construction ground disturbance.
- For projects assessed as having a moderate to high potential to adversely impact cultural resources, SPS would prepare an Inadvertent Discovery Plan (IDP) to establish protocols to be followed if archaeological sites are encountered during construction ground disturbance. Construction personnel would be briefed on the IDP and SPS would notify tribal representatives of the project schedule at least one week in advance of commencement of ground disturbance. Tribal representatives may also conduct site visits to observe construction ground disturbance.
- Archaeological sites identified during construction would be delineated as
 appropriate, recorded, and evaluated for National Register of Historic Places (NRHP)
 eligibility. Archaeological sites are protected by state law and, if identified,
 disturbance or removal of archaeological deposits may require a DAHP-issued
 permit. Permit applications would require a curation agreement for recovered
 artifacts and are subject to review by tribal representatives as well as the DAHP.
 Controlled excavation of a portion of the site by professional archaeologists for data
 recovery may also be required for the permit.

3.8.4 Significant Unavoidable Adverse Impacts

At the programmatic level, no significant unavoidable adverse impacts to cultural resources are anticipated to result from implementation of the potential projects included in the BEX VI Capital Levy Program. Appropriate project-specific environmental review will be prepared for individual projects included in the BEX VI Capital Levy Program and additional site-specific information about potential cultural resource impacts would be further assessed at that time. With appropriate mitigation for each site, significant adverse cultural resource impacts are not anticipated.

3.9 HISTORIC RESOURCES

This section of the Final Programmatic EIS (FPEIS) describes existing historic resources for the potential sites identified in the BEX VI Capital Levy Program and evaluates potential impacts that could occur as a result of development of the BEX VI Capital Levy Program under the EIS Alternatives. SPS will conduct phased environmental review for projects under the BEX VI Capital Levy Program. Project-specific environmental review will be completed, as appropriate, for individual projects when the District begins project-specific planning, design and construction activities.

3.9.1 Regulatory Framework

Seattle School Board Policy No. 6890 indicates that SPS will comply with the Washington State Environmental Policy Act (SEPA), RCW 43.21C.120 and the SEPA Rules, Chapter 197-11 of the Washington Administrative Code, for all projects requiring environmental review. All potential project sites are within the City of Seattle, and the Seattle Municipal Code (SMC) specifically addresses historic resources with regard to SEPA requirements (SMC 25.05.675.H) as well as the Landmarks Preservation Ordinance (SMC 25.12).

The BEX VI Capital Levy Program does not involve any federal funding, permitting, or licensing and Section 106 does not apply.

Seattle's SEPA Policies

SMC 25.05.675.H identifies the preservation of "historic buildings, special historic districts, and sites of archaeological significance" as "important to the retention of a living sense and appreciation of the past." Therefore, the following policies are laid out to guide consideration of historic resources:

- A. It is the City's policy to maintain and preserve significant historic sites and structures and to provide the opportunity for analysis of archaeological sites.
- B. For projects involving structures or sites which have been designated as historic landmarks, compliance with Chapter 25.12 shall constitute compliance with the policy set forth in subsection 25.05.675.H.2.a above.
- C. For projects involving structures or sites which are not yet designated as historical landmarks but which appear to meet the criteria for designation, the decisionmaker or any interested person may refer the site or structure to the Landmarks Preservation Board (LPB) for consideration. If the Board approves the site or structure for nomination as an historic landmark, consideration of the site or structure for designation as an historic landmark and application of controls and incentives shall proceed as provided by Chapter 25.12. If the project is rejected for nomination, the project shall not be conditioned or denied for historical preservation purposes, except pursuant to subsections 25.05.675.H.2.d or 25.05.675.H.2.e.

3.9-1

- D. When a project is proposed adjacent to or across the street from a designated site or structure, the decisionmaker shall refer the proposal to the City's Historic Preservation Officer for an assessment of any adverse impacts on the designated landmark and for comments on possible mitigating measures. Mitigation may be required to ensure the compatibility of the proposed project with the color, material and architectural character of the designated landmark and to reduce impacts on the character of the landmark's site. Subject to the overview policy set forth in <u>Section 25.05.665</u>, mitigating measures may be required and are limited to the following:
 - 1) Sympathetic facade treatment;
 - 2) Sympathetic street treatment;
 - 3) Sympathetic design treatment; and
 - 4) Reconfiguration of the project and/or relocation of the project on the project site; provided, that mitigating measures shall not include reductions in a project's gross floor area.
- E. On sites with potential archaeological significance, the decisionmaker may require an assessment of the archaeological potential of the site. Subject to the criteria of the overview policy set forth in <u>Section 25.05.665</u>, mitigating measures that may be required to mitigate adverse impacts to an archaeological site include, but are not limited to:
 - 1) Relocation of the project on the site;
 - 2) Providing markers, plaques, or recognition of discovery;
 - 3) 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; and
 - 4) Excavation and recovery of artifacts.

Landmark Eligibility Review through SEPA

All projects that require SEPA review in the City of Seattle that include buildings over 45 years old are reviewed by the Seattle Department of Neighborhoods (DON) Historic Preservation staff. DON and Seattle Department of Construction and Inspections (SDCI) collaborate on this effort. The review allows Historic Preservation staff to determine whether a proposed project might impact potential Seattle Landmarks, and if so to refer the property to the Landmarks process. While most sites don't meet the Seattle Landmark criteria, City code requires this review to ensure that the City's heritage is considered in development.

Seattle Landmarks Preservation Ordinance

Seattle has designated more than 450 individual landmarks and eight landmark or special review districts of national and local significance. These properties are protected by design review of modification to the exteriors (and in some cases interiors), and a Certificate of Approval must be issued before changes can be made.

The Seattle Landmarks Preservation Ordinance (SMC 25.12) stipulates that an object, site, or improvement that is more than 25 years old may be designated for preservation as a landmark site or landmark if it has significant character, interest, or value as part of the development, heritage, or cultural characteristics of the City, state, or nation; if it has integrity or the ability to convey its significance; and if the Landmarks Board determines that it meets at least one of the six standards for designation (SMC 25.12.350):

- A. It is the location of, or is associated in a significant way with, a historic event with a significant effect upon the community, City, state, or nation; or
- B. It is associated in a significant way with the life of a person important in the history of the City, state, or nation; or
- C. It is associated in a significant way with a significant aspect of the cultural, political, or economic heritage of the community, City, state or nation; or
- D. It embodies the distinctive visible characteristics of an architectural style, or period, or of a method of construction; or
- E. It is an outstanding work of a designer or builder; or
- F. Because of its prominence of spatial location, contrasts of siting, age, or scale, it is an easily identifiable visual feature of its neighborhood or the City and contributes to the distinctive quality or identity of such neighborhood or the City.

Following the Board's vote to designate a landmark, a controls and incentives agreement is negotiated between the Board staff and the owner. Controls define the features of the landmark to be preserved and outline the Certificate of Approval process for changes to those features.

If the Board does <u>not</u> designate a nominated property, the proceedings terminate and the property cannot be considered again for designation for a period of ten years, except at the request of the owner.

SPS today owns more than 100 properties throughout the City of Seattle. 30 school buildings in use by the District are designated Seattle Landmarks (see **Table 3.9-1** for summary of the historic status of potential sites under the BEX VI Capital Levy Program)

National Register of Historic Places and Washington Heritage Register

The National Register of Historic Places (NRHP), administered by the National Park Service, is the official federal list of districts, sites, buildings, structures, and objects significant in American history, architecture, archeology, engineering, and culture. National Register properties have significance to the history of their community, state, or the nation. In Washington State, the Washington State Advisory Council on Historic Preservation, organized and staffed by the Washington State Department of Archaeology and Historic Preservation (DAHP), considers each property proposed for listing and makes a recommendation on its eligibility.

To be eligible for listing, normally a property must be at least 50 years of age and have significance in American history, architecture, archaeology, engineering, or culture, demonstrated by meeting one or more of four criteria:

- A. Association with events that have made a significant contribution to the broad patterns of our history; or
- B. Association with the lives of significant persons in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded or may be likely to yield, information important in history or prehistory.

In addition to this association with an important historic context, a property must also possess integrity of location, design, setting, materials, workmanship, feeling, and association to the extent that it can convey its significance.

Properties listed in the NRHP are automatically listed in the Washington Heritage Register (WHR). The WHR is an official listing of historically significant sites and properties throughout the state, with the list maintained by DAHP.

Chief Sealth International High School is listed in the NRHP and WHR.

Executive Order 21-02

Governor's Executive Order (GEO) 21-02 (which replaced GEO 05-05) requires agencies using state funds to consider how proposed projects may impact cultural resources, in order to avoid or minimize adverse impacts. This obliges consultation with DAHP and affected tribes, for state-funded projects involving new construction, demolition, ground disturbance, rehabilitation/renovation, and acquisition. GEO 21-02 applies to state-funded projects that are not already required to undergo Section 106 review due to federal funding, permitting, or licensing.

3.9.2 Affected Environment

Existing Conditions

Brief Overview – SPS Buildings

The history of Seattle School District Number 1 dates back to 1882, when its first Superintendent was named. The oldest school buildings still in use today include B.F. Day and Seward, both from the 1890s. In the 20th century, the district grew quickly into an urban school system and consistently experienced the need for additional space. Early school district architects James Stephen (1901–1909) and Edgar Blair (1909–1918) developed "model school plans" that could be used and adapted repeatedly for the design and construction of new buildings. While the first schools were wood-framed and wood-clad, soon "fireproof" materials of concrete, brick, and terra cotta gained favor; styles varied.

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In the 1920s and 1930s, population growth and a well-funded building campaign led to construction of many new schools. School district architect Floyd A. Naramore (1919–1932) guided this period, favoring the Georgian Revival style. Through the Depression and World War II, expansion of facilities was limited.

A rapid increase in enrollment following World War II, coupled with aging facilities, necessitated planning for expansion. SPS no longer retained a district architect, instead preferring to hire firms individually for projects. Between 1948 and 1965, 35 new school buildings were built. Designed by a variety of architects, all were Modern in style.

Enrollment plummeted in the 1970s, after having reached a peak of over 93,000 in 1965. School closures continued in the 1980s, and by that time many of the buildings were in need of upgrades or replacement. The first BEX Levy was approved by voters in 1995.

Designated Seattle Landmarks

SPS today owns more than 100 properties throughout Seattle. 30 school buildings in use by the District are designated Seattle Landmarks (see **Table 3.9-1** for summary of the historic status of potential sites under the BEX VI Capital Levy Program). Each landmark building has specific controlled features, based on its character-defining features. For the school properties, these typically include the exterior (including roof) of the historic building, as well as the site. Later, non-significant additions and/or portables may be specifically excluded from the controlled features. In some cases, particularly significant interior elements are included.

Table 3.9-1
SPS BEX VI CAPITAL LEVY PROGRAM – HISTORIC STATUS OF POTENTIAL
SITES

| School | Built Date | Address | Designer | City Listing Status | | |
|-------------------|----------------|------------------------------|----------------------------|--|--|--|
| Elementary/K-8 | Elementary/K-8 | | | | | |
| Arbor Heights ES | 2016 | 3701 SW 104 th St | | Not eligible (age) | | |
| Bailey Gatzert ES | 1988 | 1301 E. Yesler Way | | Not eligible (age) | | |
| Bryant ES | 1926 | 3311 NE 60 th St | Floyd A. Naramore | Seattle Landmark | | |
| Concord ES | 1913 | 723 S. Concord St | Edgar Blair | Seattle Landmark | | |
| Dearborn Park ES | 1971 | 2820 S. Orcas St | Fred Bassetti & Company | Nomination denied by LPB in 2003 | | |
| Gatewood ES | 1910 | 4320 SW Myrtle St | Edgar Blair | Seattle Landmark | | |
| Genesee Hill ES | 2016 | 5013 SW Dakota St | | Not eligible (age) | | |
| Graham Hill ES | 1961 | 5149 S. Graham St | Theo Damm | Nomination denied by LPB in 2002 | | |
| Leschi ES | 1988 | 135 32 nd Ave | | Not eligible (age) | | |

| School | Built Date | Address | Designer | City Listing Status |
|--|---------------|-------------------------------|-----------------------------|---|
| Lowell ES | 1919 | 1058 E. Mercer | Edgar Blair | Unevaluated |
| Sacajawea ES | 1959 | 9501 20 th Ave NE | Waldron & Dietz | Nominated and denied Seattle Landmark status |
| Stevens ES | 1906 | 1242 18 th Ave E. | James Stephen | Seattle Landmark |
| Wedgwood ES | 1955 | 2720 NE 85 th St | John Graham & Co. | Unevaluated |
| STEM K-8 at Louisa Boren | 1963 | 5950 Delridge Way SW | NBBJ | Unevaluated |
| Cascade Parent Partnership K-8 (North Queen Anne School) | 1914 | 2919 1 st Ave W. | Edgar Blair | Unevaluated (extensive renovation 2022) |
| Salmon Bay K-8 (James Monroe) | 1931 | 1810 NW 65 th St | Floyd A. Naramore | Unevaluated |
| Middle Schools | | | | |
| Aki Kurose MS | 1952 | 3928 S. Graham St | William Mallis | Nominated and denied Seattle Landmark status |
| Eckstein MS | 1950 | 3003 NE 75th St | William Mallis | Seattle Landmark |
| Jane Addams MS | 1949 | 11051 34 th Ave NE | Mallis, DeHart & Hopkins | Unevaluated |
| Madison MS | 1929 | 3429 45 th Ave SW | Floyd A. Naramore | Seattle Landmark |
| Robert Eagle Staff MS | 2017 | 1330 N. 90 th St | | Not eligible (age) |
| Whitman MS | 1959 | 9201 15 th Ave NW | Mallis & DeHart | Unevaluated |
| High Schools | | | | |
| Ballard HS | 1999 | 1418 NW 65 th St | | Not eligible (age) |
| Chief Sealth | 1957 | 2600 SW Thistle St | NBBJ | NR/WHR |
| International HS | | | | Nomination denied by LPB in 2008 |
| Franklin HS | 1912 | 3013 S. Mt. Baker Blvd | Edgar Blair | Seattle Landmark |
| Ingraham HS | 1959 | 1819 N. 135 th St | NBBJ | Seattle Landmark |
| Nathan Hale HS | 1963 | 10750 30 th Ave NE | Mallis & DeHart | Nomination denied by LPB in 2008 (extensive renovation 2010) |
| Roosevelt HS | 1922 | 1410 NE 66 th St | Floyd A. Naramore | Seattle Landmark |

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| School | Built Date | Address | Designer | City Listing Status |
|--|----------------|------------------------------|---|---|
| Seattle World School (T.T. Minor School) | 1941 | 1700 E. Union | Naramore & Brady | Nomination denied by LPB in 2014 (extensive renovation 2016) |
| West Seattle HS | 1917 | 3000 California Ave SW | Edgar Blair | Seattle Landmark |
| Interagency (Columbia School) | 1922 | 3528 S. Ferdinand | Floyd A. Naramore | Unevaluated |
| Interagency (Roxhill School) | 1958 | 9430 30 th Ave SW | John Graham & Co. | Unevaluated |
| Interim Sites | | | | |
| Van Asselt Interim Site | 1909 & 1950 | 7201 Beacon Ave S. | James Stephen w/ Edgar Blair (1909); Jones & Bindon (1950) | Seattle Landmark (1909 building only; 1950 building denied) |
| John Marshall Interim Site | 1927 | 520 NE Ravenna Blvd | Floyd A. Naramore | Unevaluated |

Source: SPS and City of Seattle, 2024.

3.9.3 Impacts of the Alternatives

This section of the FPEIS identifies how the potential BEX VI Capital Levy Program under the EIS Alternatives would relate to historic resources during construction and long-term operations of potential projects.

Alternative 1 - No Action Alternative

Under Alternative 1, the No Action Alternative, no potential projects would occur under the BEX VI Capital Levy Program. Existing SPS buildings would be retained as they are, without funds for repair and maintenance. While no significant impacts to historic resources would result from the No Action Alternative, eventually a slow deterioration of historic building fabric could take place due to deferred maintenance.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Under Alternative 2, SPS would potentially implement the BEX VI Capital Levy Program, which is anticipated to include school replacements, modernizations and additions, athletic field improvements and athletic facility lighting improvements, play area surface conversions, site improvement projects (stormwater improvements, site development, new fields, etc.), clean energy projects, and system repair and maintenance projects.

Construction Impacts

Replacement School Projects

Replacement school projects would result in demolition of an existing building and its replacement with a new building on the same site. While the list of projects is not yet finalized, none of the schools currently proposed to receive a replacement building is a designated landmark. (The possible replacement building at the Van Asselt site would involve demolition of the 1950 building only, and not of the designated 1909 building.) Any building over 45 years of age that has not previously been evaluated for eligibility as a Seattle Landmark, will require a historical analysis by DON Historic Preservation staff and/or referral to the Landmarks process as part of the Master Use Permit (MUP) process.

If any of the new school sites are adjacent to or across the street from a designated Seattle Landmark, SEPA affords the City Historic Preservation Officer a chance to review the proposed project for an assessment of any adverse impacts on the designated landmark and for comments on possible mitigating measures.

During demolition of any existing buildings and construction of new buildings, there is the potential for minor impacts to nearby historic buildings (if any are present) from excessive dust and/or construction vibration. With implementation of dust control measures and vibration monitoring, as well as temporary stabilization if needed, these impacts can be minimized.

Modernization and Addition Projects

Modernization and addition projects would involve alterations and/or additions to existing school buildings. While the list of projects is not yet finalized, two possible projects involve designated landmarks—a modernization of Franklin High School and an addition to West Seattle High School. As part of the permitting process, these projects would require review and approval by the Landmarks Preservation Board, with a Certificate of Approval from the DON prior to any work being undertaken.

Any building over 45 years of age that has not previously been evaluated for eligibility as a Seattle Landmark, will require a historical analysis by the DON Historic Preservation staff and/or referral to the Landmarks process as part of the MUP process.

During construction of building additions, there is the potential for minor impacts to nearby historic buildings (if any are present) from excessive dust and/or construction vibration. With implementation of dust control measures and vibration monitoring, as well as temporary stabilization if needed, these impacts can be minimized.

Building Reconfiguration Projects

Building reconfiguration projects refer to a reconfiguration of internal or District programming and not to significant building alterations. However, if a particular project were to involve controlled features of a designated landmark, SPS would be required to obtain a Certificate of Approval from the DON before proceeding with the project.

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Athletic Field, Play Area, Site Improvements and Lighting Projects

Athletic field and play area improvement projects are generally planned to consist of the replacement of natural turf with synthetic turf, and in some cases replacement of field equipment. Site improvement projects could include elements such as sidewalks and retaining walls, stormwater improvements, and field renovations. Upgraded or new athletic facility lighting is also proposed for some sites.

A number of possible locations for such projects are designated Seattle Landmarks. However, such changes would not be anticipated to change the character of the sites or result in adverse impacts to the historic properties. For the projects involving controlled features of a designated landmark, SPS would be required to obtain a Certificate of Approval from the DON before proceeding.

System Repair and Maintenance Projects

System repair and maintenance projects would typically involve in-kind maintenance or systems repair, not character-defining features or controlled features of a designated Seattle Landmark school building. Therefore, these types of projects would be unlikely to impact historic resources. If a particular project were to involve controlled features of a designated landmark, SPS would be required to obtain a Certificate of Approval from the DON before proceeding with the project.

Operation Impacts

No operational impacts to historic resources are anticipated.

Cumulative Impacts

No cumulative impacts to historic resources are anticipated.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Construction Impacts

Alternative 3 would result in implementation of a modified selection of potential projects identified for the BEX VI Capital Levy Program, with no school replacement projects or new buildings. Impacts from modernization and addition projects; building reconfiguration projects; athletic field, play area, site improvement and lighting projects; and system repair and maintenance projects would be anticipated to be the same as under Alternative 2 above.

Operation Impacts

Similar to Alternative 2, no operational impacts to historic resources are anticipated under Alternative 3.

Cumulative Impacts

Similar to Alternative 2, no cumulative impacts to historic resources are anticipated.

3.9.4 Mitigation Measures

The following mitigation measures have been identified to further reduce the potential for impacts to historic resources associated with the potential BEX VI Capital Levy Program projects under the EIS Alternatives:

- Potential projects involving designated Seattle Landmarks will require review and approval by the Landmarks Preservation Board and issuance of a Certificate of Approval by the DON.
- Any building over 45 years of age that has not previously been evaluated for eligibility as a Seattle Landmark, will require a historical analysis by the DON Historic Preservation staff and/or referral to the Landmarks process as part of the MUP process. If the property is subsequently designated a Seattle Landmark, potential changes will require a Certificate of Approval.
- When planning potential projects involving designated or eligible historic resources, SPS and its selected design team should consider character-defining features from the outset of the project and craft a sensitive approach to avoid or minimize potential adverse impacts.
- With adjacency review under SEPA, the City of Seattle Historic Preservation Officer
 will have the opportunity to review any potential project adjacent to or across the
 street from a designated Seattle Landmark, for an assessment of adverse impacts
 on the designated landmark and for comments on possible mitigating measures.

3.9.5 Significant Unavoidable Adverse Impacts

At the programmatic level, no significant unavoidable adverse impacts to historic resources are anticipated to result from implementation of the potential projects included in the BEX VI Capital Levy Program. Appropriate project-specific environmental review will be prepared for individual projects included in the BEX VI Capital Levy Program and additional site-specific information about potential historic resource impacts would be further assessed at that time. With appropriate mitigation for each site, significant adverse historic resource impacts are not anticipated.

3.10 TRANSPORTATION

This section of the FPEIS describes the transportation system in the vicinity of the potential BEX VI Capital Levy Program alternative sites, and how the alternatives could affect the transportation system. SPS will conduct phased environmental review for projects under the potential BEX VI Capital Levy Program. Project-specific environmental review will be completed, as appropriate, for individual projects when the District begins project-specific planning, design and construction activities.

3.10.1 Affected Environment

This section describes characteristics of the overall transportation system in Seattle and includes the roadways and other transportation facilities in the vicinity of the potential schools and facilities in the BEX VI Capital Levy Program.

Existing Conditions

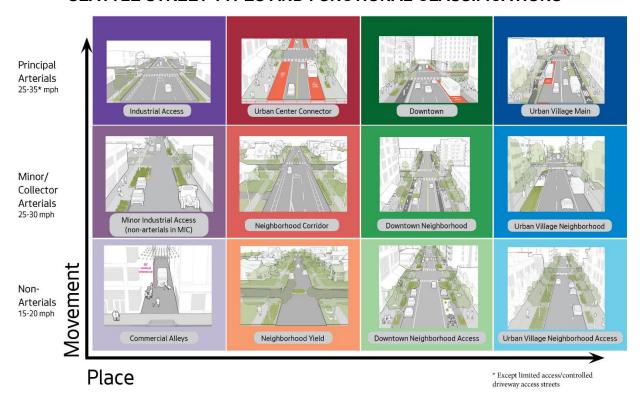
Roadways

The City's Right-of-Way Improvements Manual, *Streets Illustrated*,¹ is a comprehensive, web-based resource that sets forth the requirements, procedures, standards, and guidelines affecting physical changes in the Right of Way (ROW). To support these guidelines, the Seattle Department of Transportation (SDOT) developed Street Types that are based on the adjacent land uses and envisioned character of the street. These Street Types provide a vision for, and more specific definition of, the design elements that support Seattle's Complete Streets policies and respond to the diverse range of conditions throughout the City. They are intended to supplement the traditional functional classification system of streets, which defines how a street should function to support the movement of people, goods, and services and provide access to property.

The traditional functional classification system focuses on use and operation (arterial, non-arterial, etc.). Street Types provide evaluative design features necessary to produce a street network that is responsive to the needs and desires of individual communities. These new street types are compatible with the City's Comprehensive Plan, Seattle 2035 and Seattle's modal plans. For example, the street type that is appropriate for a main commercial thoroughfare in the heart of Downtown is unlikely to also be appropriate for a small neighborhood commercial center, even though the functional classifications of those two streets may be identical. *Streets Illustrated* has a diagram to show the relationship between functional classifications and street types, which is shown on **Figure 3.10-1** below.

https://streetsillustrated.seattle.gov/, accessed January 2024.

Figure 3.10-1
SEATTLE STREET TYPES AND FUNCTIONAL CLASSIFICATIONS



Source: Streets Illustrated, Street Type Standards.

The functional classifications represent varying levels of emphasis on mobility and access. Principal and Minor Arterials provide a higher degree of mobility and typically have more limited access to adjacent land uses. Local access streets provide a high degree of access to adjacent land and are not intended to serve through traffic, carrying lower traffic volumes at lower speeds. Collectors generally provide a more balanced emphasis on traffic mobility and access to land uses. Seattle's public schools are located on a variety of types of streets throughout the City and may be adjacent to or have access from streets that include arterials and/or local access streets.

In addition to functional classifications, the City has designated streets in Seattle's freight network. Streets in the freight network have been designated with one of four following classifications—Limited Access Facility, Major Truck Street, Minor Truck Street, and First/Last Mile Connector.² If a school is located on or near a street within a Major or Minor Freight Network, roadway characteristics and potential issues would be similar to those of any other arterial roadway, but there would likely be a higher proportion of truck traffic traveling past the school site, and design treatments, particularly at intersections, may be needed to accommodate truck turns.

SDOT City of Seattle Freight Master Plan, September 2016. (https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/FMP_Report_2016E.pdf)

The City also recognizes the role of public transportation in meeting its long-term growth, equity, and sustainability goals. In addition to supporting transit speed and reliability, identifying key transit corridors helps to inform development and improvement projects that will both enhance and integrate the City's modal master plans.

Table 3.10-1 in **Appendix B** summarizes the functional classifications of roadways nearest the potential BEX VI Capital Levy Program school sites, as noted on the City of Seattle's *Street Classification Map*. Design requirements for streets that front each site would be identified as part of project-level analysis and design.

Traffic Volumes

School-Generated Traffic

School-related traffic is typically highest during the morning arrival and afternoon dismissal periods. Depending on school start time, traffic generated during morning arrival can coincide with the traditional commuter AM peak period (typically between 7:00 and 9:00 A.M.). Most schools are dismissed in the early afternoon (before 4 P.M.) and the dismissal traffic generally does not overlap the commuter PM peak period (typically between 4:00 and 6:00 P.M.).

Traffic associated with schools is dependent on a number of factors including number and grade of students, school location, size of enrollment area, and availability of on-site or nearby on-street parking. These characteristics can affect student and staff travel modes (public transit, yellow school bus, student drivers, family-vehicle drop-off/pick-up, walk, bicycle, etc.), and the related vehicle trips.

Traffic generation for development projects, including schools, can be estimated from rates and equations published in the latest edition of the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*.³ This manual is widely used and reflects a standard practice for estimating traffic expected to result from planned development, especially when local site-specific data cannot be collected. However, it is important to note that ITE's trip generation rates were developed based on data collected from schools throughout the United States, and many of the studied sites were likely suburban schools with substantial on-site parking and little public transit use. As a result, they likely have higher vehicle trip rates than Seattle Schools.

For past analyses of modernizations, replacements, or redevelopments of Seattle schools, site-specific traffic generation rates have been developed based on traffic counts conducted at the existing school sites and compared to the published ITE rates. **Table 3.10-2** summarizes the trip rates that have been derived from field studies at Seattle schools, based on student enrollment. These rates reflect all traffic generated at the schools by staff, family-vehicles, student-vehicles, and school buses. The published ITE rates are also shown for comparison.

³ ITE, 11th Edition, September 2021.

Table 3.10-2
OBSERVED TRIP GENERATION RATES FOR SEATTLE SCHOOLS

| | Average Vehicle Trip Rates Per Student (Range) | | | |
|---|--|-----------------------------------|------------------------------|-----------------------------|
| School Type | Weekday | Morning Peak Hour ¹ | Afternoon PM Peak Hour | Commuter PM Peak Hour |
| Observed Rates for Seattle Schools ² | | | | |
| Elementary School (18 sites) | N/A ³ | 0.71 (0.52 – 0.92) | 0.49 (0.33 – 0.78) | N/A ³ |
| Junior High/Middle School (4 sites) | N/A ³ | 0.69 (0.51 – 0.78) | 0.36 (0.22 – 0.49) | N/A ³ |
| High School (4 sites) | N/A ³ | 0.37 (0.29 – 0.49) | 0.24 (0.11 – 0.38) | 0.11 |
| ITE Average Trip Rates ⁴ School Type (ITE Land Use Code) | | | | |
| Elementary School (LU 520) | 2.27 | 0.75 | 0.45 | 0.16 |
| Junior High/Middle School (LU 522) | 2.10 | 0.74 | 0.36 | 0.15 |
| High School (LU 525) | 1.94 | 0.52 | 0.32 | 0.14 |

^{1.} Depending on the start-time for the school, a school's morning peak hour may or may not directly align with the commute AM Peak Hour.

As shown, counts and analyses performed for 18 elementary schools from 2013 to 2023 for modernizations and/or replacement projects found trip rates that ranged from 0.52 to 0.92 morning peak hour trips per student and 0.34 to 0.78 afternoon peak hour trips per student.⁴ The observed rates for elementary, middle, and high schools are within the range of published ITE data. However, observed high school trip generation rates were lower than published ITE rates, likely due to the limited availability of parking and higher use of public transit, and walk/bike modes compared to suburban high schools. Trip generation for high schools during the afternoon is typically spread over several hours as students often stay at the site after the school day for extracurricular activities and staff have variable end-of-day schedules. As a result, the afternoon peak hour volume is usually less than the morning peak hourly volume.

^{2.} Source: Heffron Transportation, Inc., 2001 – 2023.

^{3.} N/A = Not Available, trip generation data not collected and rates not available; ITE rates, or adjusted ITE rates, would typically be applied.

^{4.} Source: Institute of Transportation Engineers, 2021. LU = ITE Land Use Code

⁴ Heffron Transportation, Inc., 2013-2023.

For existing school sites, traffic counts at driveways and/or at adjacent intersections can be used to develop site-specific trip generation rates. Those rates are typically applied for analyses of impacts to site access and nearby intersections. However, for some school sites (such as those that are located along higher volume arterials or near other schools or traffic generators), it may not be possible to isolate school-related traffic to determine site-specific trip generation rates. For these cases, trip generation estimates are developed from rates derived for similar schools where data are available or using the most current published rates available from ITE.

Athletic-Facility-Generated Traffic

SPS and Seattle Parks and Recreation (Parks) have historically maintained a Joint Use Agreement for shared use of athletic facilities. At school sites, SPS typically allows non-scholastic activities to be scheduled by Parks or other groups during times when they are not used for scholastic activities. Similarly, SPS is provided priority use of Parks' facilities. As a result, sites owned by either entity that contain athletic facilities may be used for practices or games associated with interscholastic athletics and for community uses such as youth and adult recreational sports and activities. At locations where field lights are present, the availability and frequency of use is typically higher, depending on the field surface. For example, lighted synthetic athletic fields often experience regular use year-round until 9:30 or 10:00 P.M. Fields that are not lighted are typically not used as frequently over winter months due to natural lighting conditions.

Athletic-field-related traffic generation depends on participation levels and attendance. It also fluctuates based on the sport, level of competition, and day of week. In Spring 2015, Heffron Transportation performed observations of participants and spectators for several high school games/matches held at lighted athletic fields.⁵ The study found most activities had between 30 and 60 participants (athletes, coaches, trainers, and support staff) with between 35 and 135 spectators. These results are consistent with findings from past studies of high school field improvement projects performed for Seattle Public Schools in 2000.⁶ Observations conducted for those studies at 11 high school baseball, softball, and soccer games found attendance ranges of 10 to 47 attendees with an average of 26 attendees. Observations after games indicated that the athletic events generated trips at rates ranging from about 0.30 to 0.58 trips per participant/spectator. For a typical soccer, lacrosse, or ultimate event, this relates to between 25 and 55 trips leaving the site during the hour after a game. Due to the start and finish times of some games or practices, some or all of this traffic could occur during the commuter PM peak hour.

It is noted that these trip generation estimates reflect rates derived from locations where little or no transit access is provided, and field users and spectators did not generally commute by transit. However, for sites located near extensive transit service—Including light rail and bus routes—students, family members, and school staff are more likely to use these transit options for trips to and from the school. Therefore, adjustments to reduce those estimates may be appropriate in locations that are well-served by transit.

3.10-5

⁵ Heffron Transportation, Inc., 2015.

⁶ Heffron Transportation, Inc., 2000.

School Events

Schools at all levels typically host activities and evening events during the school year. High schools tend to have higher numbers of events with the types, sizes, and frequency of events depending on the curriculum, programs, and facilities available at each of the schools. Elementary schools, middle schools, and K-8 schools typically host events less frequently than high schools, with larger events occurring once or twice per month. The events at all levels include those with a range of attendance levels—smaller events include monthly PTA meetings and clubs; larger events include concerts, talent shows, fundraising events, and high school athletics. The largest events, in terms of attendance and traffic generation for most schools, are typically the annual curriculum night events held in fall. Some schools separate this annual event into two sessions or into two nights based on grade levels. In most cases the traffic generated by the larger school events occurs after the commuter PM peak hour of the adjacent roadway network (which is defined as the period between 4:00 and 6:00 P.M.).

Traffic Operations

The following describes typical traffic operational conditions around the Seattle area for elementary, middle, and high schools.

- Elementary Schools. Students typically arrive by yellow school bus, family-vehicle drop-off, walking, or bicycling. Morning drop-off operations tend to be relatively efficient. Family vehicles and buses drop off students and leave the site area without substantial impacts to traffic operations. Afternoon pick-up often results in short-term busy and/or congested conditions for traffic in the school vicinity since family drivers typically park and wait for children to be dismissed. These conditions can be exacerbated where buses queue or mix with family-vehicles.
- Middle Schools. Middle schools draw from larger geographic areas than elementary schools and may accommodate a larger portion of the student population by public transit and/or school buses. Field counts and observations conducted at Seattle middle schools have found lower trip rates than at Seattle elementary schools. This may occur as the levels of family-vehicle pick-up and drop-off of students decline and older students are more likely to walk, bike, use a school bus, or take public transit. Vehicle queuing requirements may also be less (proportionally based on student population) than those for elementary schools. Separation of bus loading zones, vehicle pick-up/drop-off zones, and pedestrian routes from parking is important when it can be provided. Operations around middle schools are similar to those described for elementary schools. A larger volume of buses loading or queuing adjacent to school sites along neighborhood streets is more common.
- High Schools. High school traffic patterns differ from elementary and middle schools
 as student pick-up and drop-off levels are lower and some students may drive
 vehicles. In addition, King County Metro Transit (Metro) is the primary provider of
 student transportation for high schools. High schools host activities and evening
 events regularly throughout the school year. The types, sizes, and frequency of
 events will depend on the curriculum and programs of each school. However, based

on activity and event schedules at existing Seattle high schools, many of these events and activities consist of meetings, club activities, or sports practices. These activities serve to spread afternoon traffic out over several hours compared to schools that offer few or no afterschool activities. They may include monthly booster meetings, organization meetings and programs, student presentations, evening club activities and movies, and specialized activities (e.g., robotics). It is possible that there could be two or more activities in various locations on the site simultaneously. Seattle high schools also typically have three or four larger events each month that may draw higher levels of participation and/or spectators.

Operating conditions for roadways and intersections is measured by level of service (LOS), which is a qualitative measure used to characterize traffic operating conditions of roadways and intersection. Six letter designations, LOS "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. Roadway operations near school sites vary, depending on the types of roadways (arterials versus local access streets), levels of traffic, types of traffic control (signalized, traffic circle, stop-sign control, or uncontrolled), and local area land use and commuting patterns.

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. The City may tolerate delays in the LOS E or F range for minor movements at unsignalized intersections where traffic control measures (such as conversion to all-way-stop-control or signalization) are not applicable or desirable. The City may also tolerate LOS E or F conditions at signalized locations where physical improvements are not feasible or desirable (e.g., due to right-of-way constraints) or due to operational policy or roadway channelization decisions by the Seattle Department of Transportation (SDOT) (e.g., designation of bus-only lanes, bicycle lanes, and/or signal timings to favor transit or non-motorized travel). Level of service for each site's vicinity roadway network would be determined as part of project-specific analysis.

Transit

Public transit service in Seattle is primarily provided by Metro and Sound Transit. Snohomish County's Community Transit and Pierce County's Pierce Transit also provide limited bus service to and from Seattle, typically during the weekday commute periods. Every Metro bus is equipped to accommodate wheelchairs and is also equipped with bicycle racks.

Fixed bus routes are classified as local routes or commuter routes. Local routes typically provide two-way service between destinations within Seattle and surrounding areas, from morning through evening, five to seven days per week. Commuter bus service provides service to major employment destinations, and typically operates only during the weekday morning and evening peak commute periods, with the tendency to provide service to major employment centers in the morning and away from employment centers in the evening.

⁷ Transportation Research Board, 2016.

Stops on commuter routes are more limited than local routes. **Table 3.10-3** in **Appendix B** summarizes existing transit service at the potential BEX VI sites.

SPS provides yellow bus, door-to-door, and cab service to a variety of students attending Seattle public schools and Head Start programs. Eligibility for SPS-provided transportation depends on several factors including grade level and proximity to assigned schools. District arranged transportation is not provided for those students who by parent or student choice have enrolled in a school other than their assigned school.

The following describes the basic eligibility considerations outlined in SPS's *Transportation Service Standards 2023-2024*.8 Note that exceptions are defined for individuals based on health requirements, educational program needs, or based on certain geographical considerations.

Attendance Area Elementary and **K-8** students who live within the attendance area or linked attendance area boundaries and outside the designated walk boundaries are eligible for district arranged transportation.

Option Elementary and **K-8** students who live within the boundaries of their service area or linked service area and outside of the designated walk boundaries are eligible for transportation.

Middle School students who live within the boundaries of the Seattle School District and who live more than two miles from their assigned school are eligible for transportation. District arranged transportation is provided for those students attending a middle school in their attendance area or linked service area.

High School students are not eligible for regular transportation from Seattle Schools.

As of September 2022, all riders age 18 and younger can also ride for free on transit services provided by King County Metro, King County Water Taxi, Seattle Streetcar, Sound Transit, Community Transit, Pierce Transit, Kitsap Transit, Everett Transit, Seattle Monorail, Washington State Ferries, and Metro Flex. Riders age 13-18 are encouraged to carry an ORCA card or their school ID when riding transit but may still board without one. ¹⁰

Non-Motorized Facilities

All public schools in Seattle generate non-motorized trips, which include trips by walking, wheelchair, bike, scooter, and other micro-mobility modes. In addition to long-distance trips to and from home, pedestrian trips include those made between school and nearby transit stops, transit stations, off-site parking, or load/unload areas.

Many areas throughout Seattle have pedestrian facilities including completed sidewalk networks and/or paved pedestrian pathways, but some do not, particularly in areas that are beyond the original city limits. Signalized intersections typically include marked crosswalks

⁸ SPS, 2023 (https://www.seattleschools.org/tss-standards-23-24/), accessed December 2023

⁹ Note that Skills Center high school students are currently eligible for transportation via taxis for transportation to and from Skills Center sites.

¹⁰ City of Seattle, https://www.seattle.gov/transportation/projects-and-programs/programs/transportation-access-programs/youth, accessed December 2023).

with pedestrian signals. Marked crosswalks are provided at some stop-controlled intersections and mid-block locations. Unless explicitly prohibited by signage or barriers, crossing is legal at all intersections whether they have marked crosswalks or not.

In addition to sidewalks, non-motorized facilities in Seattle include pathways and trails that are separated from roadways, protected two-way bicycle lanes (typically separated from adjacent vehicle traffic by a barrier), in-street bicycle lanes with minor separation (typically painted lines), and roadway lanes that are marked with "sharrows" indicating that motorists should share the lane with cyclists. "Neighborhood greenways" are designated residential streets with low motorized traffic volumes and speeds that are designed to accommodate safe and pleasant travel for pedestrians and bicyclists.

Table 3.10-4 in **Appendix B** summarizes existing non-motorized characteristics near the potential BEX VI Capital Levy Program school sites.

Future Conditions

Future Transportation Improvements

Each year, the City of Seattle adopts a Capital Improvement Program (CIP) that defines planned City expenditures for infrastructure, programs, and services over the following six-year period. Transportation infrastructure includes roadways and non-motorized facilities, and expenditures include construction of new facilities as well as maintenance of existing facilities. The current version—the 2023-2028 Adopted Capital Improvement Program¹¹ includes planned spending of \$1.25 billion over the six-year period and lists large capital projects such as the Roosevelt RapidRide project, the Madison BRT RapidRide G-Line project, and several corridor improvement projects throughout Seattle. It also includes plans for transportation maintenance and rehabilitation, neighborhood programs, and systems improvements.

The City's CIP includes funding for *Move Seattle* projects. The nine-year levy was approved by voters in November 2015 and is nearing its expiration. In addition to 24 major corridor, transit, and trail projects, Move Seattle identifies implementation of localized non-motorized improvements to improve pedestrian safety, including improvements along school walking routes and within school zones. The decrease in revenue sources and subsequent economic impacts associated with the COVID-19 pandemic necessitated a pause of projects at the end of 2020, a review of impacts to individual projects, and an updated workplan was issued in late 2021. The 2023-2028 CIP reflects amended spending projections and revenue streams, including several Ordinances passed by the Seattle City Council that affected appropriations and funds authorized in the State's *Move Ahead Washington* transportation package at the end of 2022. In March 2022, the City launched a public engagement campaign soliciting input for its draft *Seattle Transportation Plan (STP)*. The STP will inform the package to be proposed as a replacement source of

¹¹ City of Seattle, 2023.

¹² City of Seattle, 2023 (https://seattletransportation/projects-and-programs/programs/seattle-transportation-plan).

funding when funds from the Move Seattle levy expire in 2024. The STP is projected to go to City Council for adoption in 2024.

Sound Transit 3 (ST3) is a regional transit funding package that was approved by voters in November 2017. It will extend existing and planned light rail lines to additional cities, and also includes a new West Seattle-to-Ballard line within Seattle. The package also includes expansion of regional bus rapid transit and express but service, as well as expansion of commuter rail service. Planning and design of ST3 projects is currently getting underway; construction of the full ST3 package is planned to occur over about a 25-year period.¹³

Relationship to Plans and Policies

The following sections describe the City of Seattle plans and policies that relate to transportation and school facilities.

Seattle Comprehensive Plan

The Seattle Comprehensive Plan¹⁴ identifies the City's land use strategy for accommodating future job and housing growth, and shows how transportation infrastructure, policies and programs will be developed to ensure that the transportation system can efficiently support that growth; this includes mode shift goals that promote a transition away from single occupant vehicles (SOV) toward walking, biking, transit and carpools. The City has developed a number of plans that focus on specific transportation modes, as described in the following sections. These more focused plans are all consistent with the Comprehensive Plan and build upon the policy framework it establishes.

In its discussion of the relationship to a vibrant economy, it states:

"In addition to goods movement, a well-designed transportation network supports a thriving economy by enhancing access to jobs, businesses, schools, and recreation."

The City has adopted many policies intended to encourage walking and bicycling as modes of transportation, including:

Policy T 3.1: Develop and maintain high-quality, affordable, and connected bicycle, pedestrian, and transit facilities.

Policy T 3.11: Develop and maintain bicycle and pedestrian facilities, including public stairways, that enhance the predictability and safety of all users of the street and that connect to a wide range of key destinations throughout the city.

Transportation safety is also a high priority, with policies that include:

Policy T 6.1: Reduce collisions for all modes of transportation and work toward a transportation system that produces zero fatalities and serious injuries by 2030 to attain the City's Vision Zero objectives.

¹³ Sound Transit, 2017.

¹⁴ City of Seattle, 2016.

Policy T 6.2: Enhance community safety and livability through measures such as reduced speed limits, lane re-channelization, and crossing improvements.

Seattle Transit Master Plan

The *Transit Master Plan*¹⁵ defines the critical role that transit plays in meeting the City's goals related to sustainability, equity, economic productivity, and livability. Developed with feedback from King County Metro and Sound Transit, the Transit Master Plan identifies the types of transit facilities, services, programs, and system features that will be required to meet Seattle's transit needs through 2030, based upon market analysis, review of future growth patterns, and evaluation of transit needs.

The TMP identifies Seattle's Frequent Transit Network (FTN), consisting of transit corridors that connect the city's urban centers and villages with frequent, reliable transit service within a short walk for most residents. The FTN corridors are identified in the City's *Transit Master Plan*, ¹⁶ and further described in the *Relationship to Plans and Policies* section of this chapter. The FTN can be served by either bus or rail. **Table 3.10-1** in **Appendix B** identifies streets near the potential BEX VI school sites that are currently or recommended to be included in the FTN.

The plan acknowledges that youth are particularly reliant on transit and established a goal for the City to work to expand access to Orca cards for students through partnerships with school and transit providers. As of September 2022, all riders age 18 and younger can ride for free on transit services provided by King County Metro, King County Water Taxi, Seattle Streetcar, Sound Transit, Community Transit, Pierce Transit, Kitsap Transit, Everett Transit, Seattle Monorail, Washington State Ferries, and Metro Flex.

Additionally, the Plan encourages route designs that serve student needs and passenger information systems that meet the expectations of tech-savvy youth. Two of the policies outlined in the TMP Summary Report specifically address schools.

Policy ToN1.2: Direct most development within urban villages, urban centers, and along the Frequent Transit Network – Use zoning and public investment to encourage development along FTN corridors. Strategies for directing development toward transit corridors may include: Building community centers, schools, courthouses, and other civic buildings along transit corridors.

Policy ToN3.3: Plan for density that responds to the character of existing development – Plan for buildings of a similar scale and character to existing structures to ensure successful integration of land use intensification. Prioritize increased density near existing activity centers, such as schools, shopping centers, job centers, or medical facilities.

¹⁵ SDOT, 2016.

¹⁶ SDOT, 2016.

City of Seattle Pedestrian Master Plan

The City's *Pedestrian Master Plan (PMP)*¹⁷ was published in June 2017 and defines the actions needed to improve walkability in Seattle. The Plan establishes objectives to complete and maintain the citywide pedestrian system, improve walkability and pedestrian safety on all streets, and to get more people walking for transportation, recreation, and health.

The PMP establishes priorities for pedestrian safety and access improvements by establishing a prioritization framework and policies, programs, and project opportunity areas to advance pedestrian safety and accessibility. It lays out the key strategies and actions that are intended to achieve the City's vision for pedestrian movement, and it establishes performance measures to gauge the success in implementing that vision. The PMP identifies a Priority Investments Network with a focus on safe access to schools and transit, where pedestrian improvements are prioritized. Components that relate to schools include: connecting gaps in the sidewalk system, improving buffers between pedestrians and vehicle traffic, improving pedestrian visibility and shortening the length of crossings, managing vehicle speeds, expanding automated speed enforcement in school zones, increasing participation in pedestrian safety, education, encouragement programs, and increasing the numbers of children walking or biking to or from school. Pedestrian improvements are planned and designed to accommodate people of all ages and abilities, especially children, seniors, and people with disabilities. The City issues periodic implementation plans and progress reports, with the most recent published in February 2023.

City of Seattle Bicycle Master Plan

The City's *Bicycle Master Plan (BMP)*¹⁸ sets forth a vision that riding a bicycle be a comfortable and integral part of daily life in Seattle for people of all ages and abilities and provides a blueprint to make it easier to decide to ride a bike. A stated goal of the BMP is to support bicycle mobility in safe routes to school to encourage bicycle travel by students, as a means to help improve their health and mental development. The BMP identifies existing and recommended future trails, bicycle lanes, shared use facilities, and neighborhood greenways. The following lists key BMP strategies and actions that specifically address schools.

Strategy 5.2 Develop a bicycle parking implementation program.

Action 5.2.2—Prioritize the installation of bicycle racks and on-street bicycle corrals in high-demand locations. High-demand locations include, but are not limited to, neighborhood business districts, community centers, libraries, universities and colleges, employment centers, parks, and schools. Determine when bicycle parking should be sheltered bicycle parking, such as at schools where students/staff will park their bicycles for extended periods of time.

https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/SeattlePedestrianMasterPlan.pdf
 SDOT, 2014.

Strategy 6.1 Develop a bicycle safety program.

Action 6.1.1 Provide bicycle education for primary school children. Work with schools to continue and expand the Safe Routes to School program to teach children to safely walk and ride a bicycle to school.

Action 6.1.2 Assess the feasibility and cost of including middle school and high school roadway safety education in Seattle schools.

Strategy 7.9 Build and expand upon public partnerships.

Action 7.9.5 – Engage with the Seattle Public Schools to continue to partner with Safe Routes to School, on traffic safety education, and encouragement of walking and biking to school.

Strategy 7.17 Establish a broad-based funding approach.

Action 7.17.8 Capitalize on the multiple benefits of bicycling to fund neighborhood initiatives out of a variety of fund sources, such as the Safe Routes to School program. The Neighborhood Street Fund, Family and Education Levy, and Neighborhood Park and Street Funds are potential funding opportunities for community-driven projects.

Each year, the City develops a *BMP Implementation Plan* that identifies the highest priority bicycle improvement projects for the following 5-year period. The current BMP implementation plan¹⁹ identifies projects planned through 2024, and including trail improvements, protected bike lanes, in-street bike lanes, shared-use facilities, and neighborhood greenways. Planned bicycle improvements in the vicinity of potential BEX VI Capital Levy Program project sites are listed in **Table 3.10-4** of **Appendix B**.

3.10.2 Impacts of the Alternatives

The following sections describe the potential range of transportation-related impacts that could be expected for the BEX VI Capital Levy Program alternatives and the types of projects included.

Alternative 1 - No Action Alternative

Alternative 1 is not expected to increase capacity at any of the school sites proposed in the BEX VI Capital Levy Program. However, school enrollment may increase since public schools are obligated by law to accommodate additional students. Some combination of portable-classroom placement, school boundary adjustments, and program relocation may be needed at schools to accommodate enrollment fluctuations. Measures to address overcrowding would be reactive instead of planned. Depending on the location, placement of portable classrooms could result in reductions of on-site parking supply. Increased enrollment would likely increase traffic volumes and congestion at locations around the District, but these impacts are unlikely to be mitigated by roadway improvements or other measures.

¹⁹ SDOT, 2021.

Because Alternative 1 would not include capital improvement projects, it would have no short-term construction impacts other than a small number of truck and employee trips needed to install portables at school sites. Sites that could be identified for portable additions to address capacity needs would not be located within close proximity of one another and are not expected to result in cumulative impacts to overlapping transportation service areas.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Alternative 2 includes a package of different project types that could be implemented at 34 sites around the District as identified in Chapter 2; **Figure 2-1** shows the locations of the potential project sites throughout the City. These project types include: major construction projects at up to 15 sites; athletic, playfield, and/or lighting improvements at 16 sites; and site improvements at up to 8 sites. The major construction projects could consist of school building replacements, new buildings at new sites, modernization and additions, and systems repair and replacement projects. The athletic facility and playfield improvements primarily would involve turf replacements, conversions to synthetic turf, and/or facility lighting installations and upgrades. This chapter analyzes the range of potential impacts that can result from each project type being considered for this alternative. The analysis is presented at a planning level of detail consistent with a programmatic analysis of potential effects. SPS will conduct appropriate project-level transportation analysis for each project when sufficient proposal details are available.

Construction Impacts

The following sections describe the range of potential transportation impacts that could occur during short-term construction of the various BEX VI Capital Levey Program Alternative 2 project elements.

Replacement Schools and New Buildings at New Sites

For school replacement projects and new buildings at new sites, existing site features (structures, parking lots, and athletic facilities) would be demolished and materials removed from the sites. There may also be excavation and grading activities (cut and fill) at the sites. Projects may require excavation and export of soil or import of soil. These activities would generate truck trips to and from the sites, often on neighborhood streets accessing the school site. Typically, trucks can carry between 15 and 20 cubic yards of soil each; trucks hauling demolition debris can often carry more (40 to 100 cubic yards) depending on the type, weight, and volume of the materials. The number and frequency of truck trips would depend on the amount of earthwork or demolition required and duration of the efforts.

Construction employees would also generate temporary traffic at the sites. For projects that would replace existing buildings with new ones, SPS typically relocates students to an existing interim site during construction, so there would be no conflict between traffic generated by construction and school activities.

For many construction efforts, site access changes, and site frontage improvements could require temporary closures of sidewalks, bike paths, on-street parking, and/or traffic lanes. In some instances, construction activities may require temporary or permanent relocations of Metro bus stops. In each case, SPS would work closely with SDOT and Metro to ensure that temporary closures are paired with alternative routes and that any permanent changes are acceptable to both agencies.

Modernization and Addition Projects

Construction of school additions and modernizations would have similar types of impacts as school replacement projects, but the level of transportation impact—including trucks generated by excavation and grading, trucks generated for hauling of materials and equipment, construction employee trips—would likely be lower for these types of projects. However, unlike school replacement projects, it is possible that construction activities could occur while the existing schools are occupied and in session. In these cases, site access and site frontage use may require temporary closures of sidewalks, bike paths, on-street parking, and/or traffic lanes. Circulation within and around the site may be affected and may require access management measures. Portable classrooms could be required to temporarily house students during construction. SPS works with SDOT to develop and implement construction transportation management plans to minimize or prevent construction-generated traffic from mixing with school-generated traffic.

Athletic Field, Play Area, Site Improvements, and Lighting Projects

Construction activities for the athletic field, play area, and site improvement projects may result in limited construction-related transportation impacts. The replacement or installation of synthetic or natural turf, installation of field or facility lighting, and resurfacing of tracks and tennis courts can usually be completed within one to three months. The traffic generation related to construction is typically minimal.

Materials would be transported to the site, and some excavation is typically needed to prepare surfaces and/or accommodate light pole foundations. Construction employees would also generate temporary traffic at the sites. Temporary closures of adjacent walkways, bikeways, traffic lanes, and parking lanes could be needed adjacent to construction activities or to accommodate utility connections, but the construction site and impacts would be more localized and limited in duration compared to that for new building construction or a major building renovation. Installation of athletic field lighting typically occurs during summer months when students are not at the site.

System Repair and Maintenance Projects

Construction-related transportation impacts of system repair and maintenance projects would be similar to the impacts of modernizations as described above.

Operation Impacts

The following sections describe the range of potential transportation impacts that could occur during long-term operations of the various BEX VI Capital Levy Program Alternative 2 project elements. It is noted that some projects that require departures from the Seattle

Land Use Code may also require project-level parking analysis as part of the codedepartures process, but that analysis is no longer required for purposes of SEPA.

Replacement Schools and New Buildings at New Sites

Many of the potential replacement projects included in the BEX VI Capital Levy Program could result in increased student enrollment capacity. As a result, these projects could be expected to increase traffic generated by each school.

Roadways

The school replacement projects are not generally expected to result in changes to the overall roadway network or intersections. However, some of the projects could include frontage improvements that would result in landscape and other enhancements, revisions to site access points on the adjacent streets, or installation of sidewalks or pedestrian walkways, and upgrades to accessible curb ramps, where required by SDOT. These projects would be subject to individual project-level review of impacts to the transportation system at the time of design and permitting.

Traffic Volumes

Table 3.10-5 presents estimates of the potential traffic increases for each 100 students of capacity added to each school site based on the range of observed rates from other Seattle Schools as well as published ITE rates presented previously in **Table 3.10-2**. As shown, each 100 students of added capacity could result daily traffic generation increases ranging from 190 to 230 trips. Student capacity increases of 100 students could increase morning traffic generation by between 30 and 90 trips and afternoon traffic generation by between 10 and 80 trips depending on the type of school. Note, these potential increases reflect the totals of both inbound and outbound school-generated trips. Since replacement projects would occur at existing school sites, the additional trips would reflect increases to traffic already being generated by the schools.

Table 3.10-5
Range of Potential Traffic Increases for Each 100 Students of Added Capacity

| School Facility (ITE Land Use Code) | Weekday | Morning | Afternoon | Commute PM Peak |
|-------------------------------------|-----------|---------|-----------|--------------------|
| Elementary School (520) | 230 | 50 – 90 | 35 – 80 | 10 – 20 |
| Middle School / Junior High (522) | 210 – 225 | 50 – 80 | 20 – 50 | 10 – 20 |
| High School (525) | 190 – 200 | 30 – 50 | 10 – 40 | 10 – 15 |

Source: Heffron Transportation, Inc. using observed rates from counts at more than 25 SPS school sites and ITE's, Trip Generation Manual, 11th Edition, 2021.

Based on the ranges of possible capacity increases envisioned and the average rates described, the highest trip generation associated with a school replacement project on an existing site is estimated at an increase of up to 270 morning peak hour trips and up to 230 afternoon peak hour trips. Schools that are proposed to accommodate increased student

capacity may also experience increased attendance and traffic generation by some of the occasional events that already occur at those sites.

For projects that would result in increases in student enrollment capacity, project-level review of site access and local area transportation impacts would be performed and based on rates derived specifically for those schools, rates derived for similar schools, or the published ITE rates presented previously.

Traffic Operations

For school replacement projects that would result in increases in student enrollment capacity, project-level review of site access and local area traffic operations would be conducted. Changes to on-site parking, nearby on-street parking, or site access conditions can also influence traffic circulation, operations of site driveways and nearby intersections, and would also be included in project-level analysis when specific projects are selected.

Transit

The school replacement projects are not expected to adversely impact transit service or facilities. Changes in school capacity or enrollment could cause increases in some bus ridership, which can typically be accommodated by existing transit capacity. However, the projects planned for elementary schools would be expected to rely more heavily on yellow school bus transportation. Therefore, changes to public transit ridership for these projects are expected to be very small and no adverse impacts to transit are expected to occur. In locations where existing transit stops are located adjacent to a project site, a minor relocation of bus stops may be required to accommodate operational needs along site frontages. If necessary, SPS would coordinate such changes with Metro and the City of Seattle.

SMC Chapter 23.79 includes a process by which SPS may depart from the zoning requirements for on-site school bus load/unload at sites located in residentially zoned areas. This departure process is described further in **Section 3.5**, Land Use of this FPEIS document. If on-street bus loading is proposed or proposed to be retained, SPS may be required to apply for a departure and would comply with the results of the departure process as determined by the Seattle Department of Constructions and Inspections (SDCI).

Non-Motorized Facilities

Changes in school capacity or enrollment could cause increases in pedestrian access trips at and around the school sites. In areas where complete walkways exist, these changes can typically be easily accommodated by existing facilities. However, in areas where the pedestrian network is incomplete, additional project-level review may identify physical or operational improvements needed to accommodate the added pedestrian trips. Prior to school re-opening, SPS, in coordination with SDOT and other representatives on the Seattle Schools Traffic Safety Committee, would review access, walk routes, and crossing locations to determine if changes or improvements are needed, and then would work with partners to implement those changes.

Maintenance, construction, and/or replacement of sidewalks or walkways could be included as part of some of the school replacement projects. These may be required by SDOT when

the improvement would include substantial renovation or new construction. Improvements to sidewalks or walkways would be considered a project benefit, and therefore no adverse impacts to non-motorized facilities are expected to occur.

Modernization and Addition Projects

The potential BEX VI Capital Levy Program modernization and addition projects could result in increased student enrollment capacity. This would be expected to increase traffic generated by each school. However, it is expected that the increases in capacity and resulting traffic generation would generally be the same or less than what may occur with the replacement school projects.

Roadways

The modernization and addition projects are not generally expected to result in changes to the overall roadway network or intersections. However, similar to school replacement projects, some of the projects could include frontage improvements that would result in landscape and other enhancements, revisions to site access points on the adjacent streets, or installation of sidewalks or pedestrian walkways, where required by SDOT. These projects would be subject to individual project-level review of impacts to the transportation system at the time of design and permitting.

Traffic Volumes

The student enrollment capacity increases that would result from additions and modernizations would be expected to result in increased traffic volumes similar to those described for the replacement projects.

Traffic Operations

For addition and modernization projects that would result in increases in student enrollment capacity, project-level review of site access and local area traffic operations would be conducted. Changes to on-site parking, nearby on-street parking, or site access conditions can also influence traffic circulation, operations of site driveways and nearby intersections, and would also be included in project-level analysis when specific projects are selected.

Transit

The addition and modernization projects are not expected to adversely impact transit service or facilities. Changes in school capacity or enrollment could cause increases in some bus ridership, which can typically be accommodated by existing transit capacity. Similar to the replacement school projects, the addition and modernization projects planned for elementary schools would be expected to rely more heavily on yellow school bus transportation. For addition and modernization projects at middle and high schools, increases in public transit demand is likely to result from student enrollment increases because they may rely more heavily on public transit for general education transportation. The capacity of public transit to accommodate increases in demand would be evaluated at the project-level as appropriate. SPS would work with King County Metro (Metro) to identify routes, periods, and facilities (e.g., bus stops) that could potentially be affected. Metro periodically monitors shifts in transit demand and makes adjustments to service and

schedule to accommodate shifts, as resources allow. Updates to transit schedules and service are typically implemented twice per year—in March and September—and are subject to public outreach and King County Council approval.

In locations where existing transit stops are located adjacent to a project site, a minor relocation of bus stops may be required to accommodate operational needs along site frontages. If necessary, SPS would coordinate such changes with Metro and the City of Seattle.

Non-Motorized Facilities

Similar to the replacement school projects, changes in school capacity or enrollment could cause increases in pedestrian access trips at and around the school sites.

Athletic Field, Play Area, Site Improvements, and Lighting Projects

Athletic field, play area improvements, and lighting projects can result in increased frequency and times of field use. A project-level review of site access and local area traffic operations would be conducted prior to making these types of improvements. Changes to on-site and nearby on-street parking demand, site access conditions, and nearby intersections may be included in the project-level analysis, when specific project elements are selected, and the improvements are defined.

Project-level review of site access and local area transportation impacts would be based on more detailed project information as well as data and studies of the site, and other athletic field and play area projects in the Seattle area. Changes in athletic-field- and play-area generated traffic can influence site access conditions. Transportation analyses of previous similar projects²⁰ evaluated proposed improvements to existing athletic fields on school sites. These analyses found that fields are generally expected to be used for scholastic baseball, softball, soccer, football, lacrosse, ultimate, and track events. The fields are also expected to continue to be used for organized non-scholastic athletic activities such as little-league baseball, softball, soccer, football, ultimate, and lacrosse. At the BEX VI school sites, additional athletic field and/or play area related traffic generation could occur along the surrounding adjacent roadways where spectators or participants may park.

Athletic field and play area projects can result in increased PM peak hour traffic generation at times when existing facilities and conditions would otherwise not allow use of fields. Although they extend the seasons and periods throughout which athletic-field-related traffic impacts may occur, they would not generate new impacts during these hours that do not already occur at other times. The range of trip generation for athletic fields was described in the *Affected Environment* section of this document.

System Repair and Maintenance Projects

System repair and maintenance projects would have no operational impacts on transportation.

²⁰ Heffron Transportation, Inc., 2000-2020.

Cumulative Impacts

Construction associated with the BEX VI Capital Levy Program could result in cumulative construction impacts in the City. This would be especially true in areas where other major construction projects are occurring. Construction associated with the BEX VI Capital Levy Program projects could add to the transportation impacts associated with other major construction projects. Because the BEX VI Capital Levy Program projects would be phased over several years and would be distributed across the City, cumulative construction transportation impacts are expected to be limited.

Some projects in the BEX VI Capital Levy Program could result in increased traffic in some neighborhoods. However, the sites identified for capacity increases are not located within close proximity of one another and are not expected to result in cumulative impacts to overlapping transportation service areas. Site specific project-level traffic studies would evaluate potential cumulative impacts of these projects along with other planned or permitted developments near each site. If necessary, mitigation plans would be developed to reduce the potential cumulative transportation impacts.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Construction Impacts

The level of construction-related traffic impacts would be determined as part of project-level analysis. Alternative 3 construction traffic impacts are expected to be similar to Alternative 2 for the addition and modernization projects. Construction impacts associated with the Alternative 3 projects would occur at two fewer sites.

Operation Impacts

Transportation impacts resulting from Alternative 3 could include traffic volume increases and operational impacts at 32 sites throughout the city (two fewer than with Alterative 2). Of these, 14 projects could increase student capacity. All but one would consist of addition and modernization projects at existing sites; the Skills Center project could involve a new building at a new site. All of these projects could provide capacity increases, which in turn would be expected to result in traffic and generation increases. Traffic increases resulting from these projects would be likely to occur in patterns already occurring at each site. Overall, Alternative 3 would be expected to result in similar levels of traffic impacts as those identified for Alternative 2; however, they would occur at fewer sites since two of the sites identified for Alternative 2 would have no projects with Alternative 3. Impacts associated with athletic field and play area projects would be the same as Alternative 2.

Cumulative Impacts

The potential for cumulative construction impacts with Alterative 3 would be similar to those described for Alternative 2. As described for Alterative 2, the Alternative 3 projects in the BEX VI Capital Levy Program could result in increased traffic in some neighborhoods. However, the sites identified for capacity increases are not located within close proximity of one another and are not expected to result in cumulative impacts to overlapping

transportation service areas. Site specific project-level traffic studies would evaluate potential cumulative impacts of these projects along with other planned or permitted developments near each site. If necessary, mitigation plans would be developed to reduce the potential cumulative transportation impacts.

3.10.3 Mitigation Measures

The following mitigation measures have been identified to further reduce the potential for transportation impacts associated with the potential BEX VI Capital Levy Program projects under the EIS Alternatives:

Construction

- As mitigation for potential construction impacts, a Construction Transportation
 Management Plan (CTMP) would be developed for each project as required by SPS
 and City of Seattle. CTMPs are expected to identify site access measures, truck haul
 routes, construction and hauling schedules that minimize impacts to the surrounding
 neighborhood. They typically identify temporary lane closures, sidewalk closures,
 temporary restrictions on on-street parking, and bus-stop relocations, if any are
 required, and identify any needed detour routes for pedestrians, bicyclists, and/or
 vehicles.
- Smaller projects would involve fewer transportation impacts and would not likely require a CTMP. However, similar mitigation measures would be implemented to maintain access to school drop off/pick up areas and to minimize impacts to neighboring streets.
- SPS would identify site-specific mitigation measures necessary to minimize construction impacts during design and project-level environmental and permitting review for specific projects.

Operation

- As described previously, if an individual project is anticipated to result in increases in vehicle trips, it is expected that site-specific, project-level transportation analysis would be conducted prior to its implementation. If potential operational or safety impacts are identified through project-level analysis, mitigation measures would be identified to minimize or avoid those impacts. Types of transportation-related mitigation measures that could be considered for the potential BEX VI Capital Levy Program projects would depend on the exact type, size, and nature of the proposed project and the associated impacts, but could include the following:
 - 1. Access and parking management measures to minimize traffic impacts;
 - 2. Event calendar coordination and public notification;
 - 3. Use, scheduling, and capacity agreements for assembly spaces such as gymnasiums, athletic fields, and performing arts facilities;

- 4. Coordination with Seattle Schools Traffic Safety Committee related to walk routes, crosswalk locations, signage, pavement markings, and school zone speed limits:
- 5. Enhanced School Zone speed limit signage (e.g., flashing beacons)
- 6. Speed enforcement, including use of speed cameras;
- 7. Monitoring of school-related impacts;
- 8. Frontage improvements such as curb, gutter, sidewalk, or walkway improvements;
- 9. Intersection channelization and/or traffic control changes and improvements;
- 10. Coordination with Metro regarding locations and operational requirements for bus stops along the site frontage;
- 11. Establishment and/or relocation of school-bus and/or passenger vehicle loading areas; and,
- 12. Development and implementation of Transportation Management Plans (TMPs) to minimize traffic-related impacts.
- Typically, measures identified as mitigation during project-specific review are incorporated into the proposal. In some cases, additional measures could be imposed by the City of Seattle as conditions of approval of a project and any associated code departures. The types of measures that have been considered for SPS projects as part of the code-departure process include: establishment of parking duration restrictions for on-street parking near schools, modifications to existing parking restrictions, operational requirements (such as staggering concurrent events, or preparation and distribution of event schedules for events held in assembly spaces on school sites), relocations of Metro bus stops, measures to minimize traffic conflicts at locations with narrow travel ways, and occasional use of hard-surface play areas for evening event parking.
- Use of the Van Asselt site for student populations other than elementary and middle school students or that are higher than previously reviewed and permitted could require extensive mitigation given the limited on-site parking and student load/unload capacity. Such measures may need to include remote (off-site) parking, extended loading zones, and substantial programs to reduce vehicle trips.

3.10.4 Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse transportation impacts are anticipated to result from implementation of the projects included in the action alternatives being contemplated for the BEX VI Capital Levy Program. Appropriate project level environmental review will be prepared for individual projects included in the BEX VI Capital Levy Program, and site-specific information about the significance of potential impacts will be further assessed at that time. With appropriate mitigation for each site, no significant adverse impacts are anticipated.

3.11 ENVIRONMENTAL HEALTH

This section of the Final Programmatic EIS (FPEIS) describes existing environmental health conditions for the potential sites under the BEX VI Capital Levy Program and evaluates potential impacts that could occur as a result of development of potential projects in the BEX VI Capital Levy Program under the EIS Alternatives. SPS will conduct phased environmental review for projects under the BEX VI Capital Levy Program. Project-specific environmental review will be completed, as appropriate, for individual projects when the SPS begins project-specific planning, design and construction activities.

3.11.1 Affected Environment

Existing Conditions

Environmental Health Conditions

Existing buildings at potential sites identified in the BEX VI Capital Levy Program range in age and building condition. Certain existing SPS buildings can contain hazardous materials such as asbestos-containing materials (ACM), lead-containing paint (LCP), and polychlorinated biphenyl (PCB)-containing light ballasts that were utilized as part of the construction process at the time for those buildings. The likelihood that a building contains these types of hazardous materials is generally higher for older buildings since construction methods at those times were more likely to utilize those types of materials. As part of the planning process for SPS projects, a hazardous building materials survey is typically conducted for any project that involves some level of building demolition to detect the extent of any potential hazardous building materials and identify methods for removal and disposal of such materials.

All SPS school and facility locations, including potential BEX VI Capital Levy Program project site locations, are located within urban areas of the City of Seattle. While hazardous materials cleanup actions can occur anywhere, these types of actions are generally more likely to occur in urban commercial and industrial use areas where hazardous materials are more likely to be utilized and stored. The majority of the SPS school sites are located within single family residential or multi-family residential areas; however, some sites are located in areas of the City that would be proximate to uses that have increased potential for the use or storage of hazardous materials.

Table 3.11-1 provides a summary of hazardous materials cleanup actions on and adjacent¹ to potential BEX VI Capital Levy Program project sites as identified by the Washington State Department of Ecology (Ecology). The presence of hazardous materials and status of associated cleanup actions are broken down into several categories:

- Awaiting Cleanup: The site has been discovered. There may have been an initial
 investigation, Phase I or Phase II site assessment. A remedial investigation has not
 been started. No independent, voluntary cleanup program or Ecology supervised
 work has occurred.
- <u>Cleanup Started</u>: Site remedial investigation or cleanup work has begun. Includes Ecology or EPA supervised sites, voluntary cleanup program sites, and independent sites where emergency action, remedial investigation or interim action has begun.
- <u>Construction Complete Performance Monitoring</u>: Cleanup construction and source control are complete. Performance monitoring is underway to confirm cleanup action has attained standards.
- <u>Cleanup Complete Active O&M/Monitoring</u>: All construction and cleanup work has been done and cleanup standards have been met but some active operation, maintenance and/or monitoring is required.
- <u>No Further Action</u>: Site has received a No Further Action determination after review of remedial actions.

Ecology also identifies and documents areas that may potentially be affected by the Tacoma Smelter Plume. Ecology's website provides a mapping system that identifies the overall area of the Tacoma Smelter Plume and indicates the results of prior soil sampling activities or provides a predication on the potential levels of arsenic and/or lead that would be anticipated to be related to the Tacoma Smelter Plume. The status of potential BEX VI Capital Levy Program sites within the Tacoma Smelter Plume Area is also identified in **Table 3.11-1** (Washington State Department of Ecology, 2024).

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¹ For the purposes of this discussion, adjacent properties refer to those properties that are next to or across a street from a potential project site.

Table 3.11-1
SUMMARY OF ECOLOGY CLEANUP ACTIONS: POTENTIAL BEX VI PROGRAM
PROJECT SITES

| SPS Site Location | Dept. of Ecology | Tacoma Smelter Plume |
|--|---|--|
| | Cleanup Actions | Area Status |
| Replacement School or I | New Building at New Site Projects | |
| Bailey Gatzert ES | Onsite: None Offsite ¹ : 3 cleanup actions to the North (1 started, 2 awaiting cleanup), 1 cleanup action to the east (cleanup started), 1 action to the west (cleanup started). | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm²). |
| Sacajawea ES | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Whitman MS | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Seattle World School (T.T Minor School) | Onsite: Cleanup action completed Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Modernization or Addition | on Projects | |
| Lowell ES | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| STEM K-8 at Louisa Boren | Onsite: None Offsite: 1 cleanup action to the north (awaiting cleanup). | Within the Tacoma Smelter Plume but sampling that was completed indicates site is below cleanup levels for arsenic and lead. |
| Aki Kurose MS | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Franklin HS | Onsite: None Offsite: 3 cleanup actions west of the athletic field (1 awaiting cleanup, 2 cleanup started) | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Chief Sealth International HS | Onsite: Cleanup action completed Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| West Seattle HS | Onsite: Cleanup action completed Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume with predicted |

| SPS Site Location | Dept. of Ecology Cleanup Actions | Tacoma Smelter Plume Area Status |
|---|--|--|
| | | cleanup levels between 20 ppm and 40 ppm. |
| Interagency HS (Columbia School) | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Interagency HS (Roxhill Site) | Onsite: None Offsite: 4 cleanup actions to the south (2 cleanup actions completed, 1 awaiting cleanup, 1 cleanup started). | Within the Tacoma Smelter Plume but sampling that was completed indicates site is below cleanup levels for arsenic and lead. |
| Van Asselt Interim Site | Onsite: None Offsite: 1 cleanup action to the east (cleanup started). | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| John Marshall Interim Site | Onsite: None Offsite: 1 cleanup action to the northwest (cleanup started). | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Athletic Fields Projects | | |
| Salmon Bay K-8 | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Eckstein MS | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Whitman MS | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Robert Eagle Staff MS | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Denny MS/Chief Sealth HS Athletic Fields | Onsite: None Offsite: 1 cleanup action to the south (cleanup started). | Within the Tacoma Smelter Plume but sampling that was completed indicates site is below cleanup levels for arsenic and lead. |
| Franklin HS | Onsite: None Offsite: 3 cleanup actions west of the athletic field (1 awaiting cleanup, 2 cleanup started) | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Roosevelt HS | Onsite: None Offsite: 1 cleanup action to the south (awaiting cleanup). | Within the Tacoma Smelter Plume but predicted to be |

| SPS Site Location | Dept. of Ecology Cleanup Actions | Tacoma Smelter Plume Area Status |
|------------------------------------|--|--|
| | | below cleanup levels (under 20 ppm). |
| Van Asselt Interim Site | Onsite: None Offsite: 1 cleanup action to the east (cleanup started). | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Lighting Projects | | |
| Eckstein MS | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Jane Addams MS | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Ingraham HS | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Chief Sealth HS Athletic Fields | Onsite: None Offsite: 1 cleanup action to the south (cleanup started). | Within the Tacoma Smelter Plume but sampling that was completed indicates site is below cleanup levels for arsenic and lead. |
| Ballard HS | Onsite: Cleanup action completed Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Play Area Surface Conve | ersion Projects | |
| Leschi ES | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Genesee Hill ES | Onsite: Cleanup action completed Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume with predicted cleanup levels between 20 ppm and 40 ppm. |
| Bryant ES | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Gatewood ES | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but sampling that was completed indicates site is below cleanup levels for arsenic and lead. |

| SPS Site Location | Dept. of Ecology Cleanup Actions | Tacoma Smelter Plume Area Status |
|---|---|--|
| Concord ES | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Site Improvement Project | ets | |
| Arbor Heights ES | Onsite: Cleanup action completed Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume with predicted cleanup levels between 20 ppm and 40 ppm. |
| Wedgewood ES | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Stevens ES | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Dearborn Park ES | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| STEM K-8 at Louisa Boren | Onsite: None Offsite: 1 cleanup action to the north (awaiting cleanup). | Within the Tacoma Smelter Plume but sampling that was completed indicates site is below cleanup levels for arsenic and lead. |
| Madison MS | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but sampling that was completed indicates site is below cleanup levels for arsenic and lead. |
| Cascade Parent Partnership (at North Queen Anne School) | Onsite: None Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |
| Nathan Hale HS | Onsite: Cleanup action completed. Offsite: No adjacent cleanup actions. | Within the Tacoma Smelter Plume but predicted to be below cleanup levels (under 20 ppm). |

Source: Washington State Department of Ecology, 2024.

Offsite cleanup actions refer to actions that are identified adjacent to the site (those properties that are next to or across a street from a potential project site).

ppm is a unit of measurement that indicates parts per million.

As noted in **Table 3.11-1**, none of the potential sites under the BEX VI Capital Levy Program are identified as awaiting cleanup actions or have active cleanup actions that are currently ongoing. Seven of the potential sites under the BEX VI Capital Levy Program have had cleanup actions that have previously occurred and been completed on their respective sites as documented by Ecology, including Arbor Heights ES, Genesee Hill ES, Ballard HS, Chief Sealth HS, Nathan Hale HS, Seattle World School HS, and West Seattle HS.

As also indicated in **Table 3.11-1**, while all potential sites are located within the area of the Tacoma Smelter Plume, the majority of the potential sites under the BEX VI Capital Levy Program are predicted to have levels of arsenic or lead that are less than 20 ppm which would be below Ecology's recommended cleanup levels or have had recent sampling that was completed to confirm that the area is below recommended cleanup levels. Three potential sites (Arbor Heights ES, Genesee Hill ES, and West Seattle HS) have been predicted by Ecology to have arsenic and/or lead levels related to the Tacoma Smelter Plume that would be between 20 ppm and 40 ppm. On previous SPS projects (e.g., Alki Elementary School), Ecology has recommended that sites with predicted levels of arsenic and/or lead between 20 ppm and 40 ppm undergo site specific testing during project-specific planning and environmental review to confirm soil conditions. When soil testing is recommended by Ecology, SPS would conduct the testing as part of project-specific planning and review. The testing results are then sent to Ecology for concurrence.

Synthetic Turf Conditions

Many SPS school sites, including several of the potential sites identified in the BEX VI Capital Levy Program, contain athletic fields and/or play areas that utilize synthetic turf. The use of synthetic turf for athletic field and play area surfaces has its benefits as the synthetic turf is a more durable surface that is able stand up to high levels of usage and can be utilized more frequently in wet weather conditions. Synthetic turf fields also require less maintenance than natural grass playing surfaces which generally require regular watering and fertilizer treatments which can all have effects on the environment in their own right.

However, there are also certain environmental health considerations that are associated with the use of synthetic turf products. Athletic fields and recreation areas that utilize older synthetic turf products can contain a tire rubber crumb (TRC) infill that helps to support the synthetic turf surface. TRC has been associated with the emission of volatile organic compounds, leaching of heavy metals and other contaminants to water, and generates a large GHG footprint in its production. However, in its more recent use of synthetic turf surfaces, SPS has utilized alternatives to TRC as infill for its athletic field and recreation area projects. Namely, SPS has used cork infill which is a natural, non-toxic product that is developed from the bark of cork trees, or Envirofill which is an eco-friendly infill material for synthetic turf surfaces.

Another consideration in the use of synthetic turf surfaces is the presence of Per- and Polyfluoroalkyl Substances (PFAS). PFAS are manufactured chemicals that have been used in industry and consumer products since the 1940s due to their unique properties such as resistance to heat, water, and oil. PFAS are persistent, long-lasting chemicals that break down very slowly over time and due to their wide-spread use are found in the blood of people and animals, as well as water, air, and soil around the globe. They are also found in

many different consumer, commercial, and industrial products, as well as at low levels in a variety of food products and the environments. Scientific studies have shown that high exposure to some types of PFAS can be linked to some harmful health effects in humans and animals. Research is currently ongoing to determine how exposure to different types of PFAS can lead to a variety of health effects and the US Environmental Protection Agency (EPA) is leading several research initiatives to better understand the risks of PFAS and develop new and more effective methods to identify and measure PFAS (EPA, 2024).

Some synthetic turf materials have been known to contain PFAS and the potential that synthetic turf fields may contain PFAS is an area of current active research since PFAS has been previously used in many of the components to manufacture synthetic turf. Therefore, additional investigation is required to determine if PFAS are present in synthetic turf fields and if present, if PFAS are released from athletic fields in sufficient quantities to pose a risk to public health or the environment. Currently, peer reviewed research on the topic of PFAS and synthetic turf fields is limited to a single study conducted by researchers from public health departments and universities in Sweden and Canada (Lauria, et. al, 2022). The study indicated that the fluorinated substances measured in synthetic turf fields appear to be bound to the components of the turf and do not leach into the environment. Further, they are not the type of fluorinated chemicals that transform in the environment into harmful PFAS. As a result, the peer-reviewed study indicated that the presence of fluorinated substances in synthetic turf does not appear to pose an exposure concern to users of the field (Connecticut Dept of Public Health, 2024).

In addition, a technical memorandum from the New Jersey Department of Environmental Protection provided a review of current literature and reports on PFAS and synthetic turf. One of the primary conclusions from that memo was that it is not appropriate to generalize about PFAS in all synthetic turf as variability in manufacturing processes and materials would likely impact the PFAS content and potential leachability (New Jersey Department of Environmental Protection, 2023).

Nevertheless, SPS has received documentation and confirmation from many of its suppliers for recent projects with synthetic turf (including test results for manufacturer's respective products) that their products either do not use PFAS chemicals in their manufacturing process (Shaw Sports Turf, 2023; Sprinturf, 2023; Benyon, 2024; and Hellas, 2024), or their products contain very low levels of PFAS that do not represent a human health risk (FieldTurf, 2024). In addition, for more recent SPS projects involving the use of synthetic turf, such as the ones occurring at Maple Elementary and John Muir Elementary, the bid documents for each project are being prepared to provide clarity and transparency on the presence of PFAS substances in any synthetic turf materials. Bid documents will be required to address certification regarding the presence or absence of PFAS substances, performance data, and testing protocols. Bidders will be required to submit appropriate and verifiable certification disclosing the presence of any PFAS chemicals in their turf products, the testing methods used, and the thresholds applied to provide such certification. Bidders will also be asked to certify that their synthetic turf system does not involve any PFAS chemicals to manufacture the components of their synthetic turf products.

3.11.2 Impacts of the Alternatives

This section of the FPEIS identifies how the potential projects in the BEX VI Capital Levy Program under the EIS Alternatives would relate to environmental health conditions during construction and long-term operations.

Alternative 1 - No Action Alternative

Under Alternative 1 – No Action Alternative, the BEX VI Capital Levy Program would not move forward, and no construction activities or demolition activities would occur that could disturb potential hazardous buildings materials in existing buildings. No new or replacement synthetic turf projects would be provided for athletic fields or recreation areas at potential sites.

To the extent that increased enrollment may occur, since public schools are obligated by law to accommodate additional students, portable classroom buildings could be required at certain site locations. In the event that portable classroom buildings are necessary for a specific site, it would be anticipated that such buildings would be located in previously disturbed and paved areas and that the level of excavation would be minimal (e.g., potential shallow excavations for utility connections). In addition, as part of project specific design and planning, SPS would conduct site specific research to ensure potential portable classroom building site locations contain no additional hazardous materials issues or proximity to existing cleanup actions. As a result, it is anticipated that the No Action Alternative would not result in any significant, unavoidable adverse impacts.

Alternative 2 – Improved Conditions with Replacement Schools, Additions, Modernizations, Play Area, or Field Improvements

Alternative 2 includes a package of potential project types under the BEX VI Capital Levy Program that would be implemented at up to 42 sites around the District. These project types would include: major construction projects at up to 15 sites; athletic, playfield, and/or lighting improvements at up to 18 sites; and site improvements at up to 8 sites. The major construction projects could consist of school building replacements, new buildings at new sites, modernization and additions, building reconfigurations, and systems repair and replacement projects. The athletic facility and playfield improvements primarily would involve turf replacements, conversions to synthetic turf, and/or facility lighting installations and upgrades. This section analyzes the range of potential impacts that can result from each project type under Alternative 2. The analysis is presented at a planning level of detail consistent with a programmatic analysis. SPS will conduct appropriate project-level environmental analysis (including environmental health conditions) for each project when sufficient project-level details are available.

Construction Impacts

The following describes potential environmental health impacts that could occur during short-term construction activities of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement School and New Buildings at New Site Projects

Construction activities associated with replacement schools and new buildings at new site projects would require the demolition of existing onsite structures and removal and disposal of building materials. It is possible that some existing buildings may contain hazardous materials such as asbestos-containing materials (ACM) and lead-containing paint (LCP). As part of the project planning process for specific potential projects under the BEX VI Capital Levy Program, a hazardous building materials survey would be conducted for any project that involves some level of building demolition to detect any potential hazardous building materials and identify methods for removal and disposal of such materials in accordance with applicable requirements. Any potential environmental health hazards within specific buildings would be identified as part of project-specific environmental review and project-specific design process.

Development of potential replacement schools and new buildings at new site projects would require excavation and grading activities as part of project development such as building foundations, utility connections and other necessary project elements. As indicated in **Table 3.11-1**, potential replacement schools and new buildings at new sites projects do not contain any active cleanup actions that would be affected by excavation or grading activities. The Seattle World School HS (T.T. Minor School site) does contain a previous cleanup action; however, that action has since been completed as documented by Ecology. Each of the potential sites are also located in areas that have been sampled or have predicted levels of arsenic/lead associated with the Tacoma Smelter Plume that would be below 20 ppm and as a result it is anticipated that supplemental soil sampling for issues regarding the Tacoma Smelter Plume would not be required.

In the event that potential replacement schools and new buildings at new site projects include the use of synthetic turf for athletic fields or play areas, it would be anticipated that SPS would continue to require contractors to provide certification regarding the presence or absence of PFAS substances, performance data, and testing protocols as part of the project-specific design and development process. Contract bidders would be required to submit appropriate and verifiable certification disclosing the presence of any PFAS chemicals in their turf products, the testing methods used, and the thresholds applied to provide such certification. Bidders would also be required to certify that their synthetic turf system does not involve any PFAS chemicals to manufacture the components of their synthetic turf products.

Modernization and Addition Projects

Construction of potential modernization and addition projects under Alternative 2 would result in similar types of environmental health impacts as school replacement projects;

however, these impacts would likely be lower due to the lower amount of construction-related activity that would be necessary for modernization and addition projects.

Modernization projects under Alternative 2 could require selective portions of interior building demolition activities which could expose potential hazardous materials such as ACM and LCP. As part of the project planning process for specific potential projects under the BEX VI Capital Levy Program, a hazardous building materials survey would be conducted for any project that involves some level of building demolition to detect any potential hazardous building materials and identify methods for removal and disposal of such materials in accordance with applicable State requirements. Any potential environmental health hazards within specific buildings would be identified as part of project-specific environmental review and project-specific design process. Potential modernization projects would not be anticipated to require excavations or other site grading activities and as such, any completed cleanup actions or adjacent offsite cleanup actions would not be affected.

Under Alternative 2, potential building addition projects would require some level of building demolition activities that could expose potential hazardous building materials within existing buildings. Any potential environmental health hazards within specific buildings would be identified as part of a hazardous building materials survey that would be completed as part of the project-specific environmental review and project-specific design process and appropriate methods for removal and disposal would be provided for each potential project.

It would be anticipated that potential building addition projects would include some level of excavation and grading activities during construction as part of building foundations, utility connections and other necessary project elements. As noted in Table 3.11-1, potential building addition project sites do not contain any active cleanup actions that could be affected by project-specific excavation or grading activities. The Chief Sealth HS site and West Seattle HS site have undergone previous cleanup actions; however, those actions have been completed as documented by Ecology. The majority of the potential addition project sites are also located in areas that have been sampled or have predicted levels of arsenic/lead associated with the Tacoma Smelter Plume that would be below 20 ppm and as a result it is anticipated that supplemental soil sampling for issues regarding the Tacoma Smelter Plume would not be required. Ecology has identified West Seattle HS as within an area that is predicted to have concentrations of arsenic and/or lead associated with the Tacoma Smelter Plume between 20 ppm and 40 ppm. As with previous SPS projects, it would be anticipated that site specific testing would be necessary during the project-specific environmental review and design process to confirm soil conditions for the West Seattle HS site with submittal of those testing results to Ecology for concurrence.

Building Reconfiguration Projects

Construction-related environmental health impacts for building reconfiguration projects would be similar to or less than the impacts identified with replacement building, modernization and addition projects discussed above.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Constructions activities for potential athletic fields, play areas, site improvements and lighting projects would likely require some level of excavation and grading activities that would expose onsite soils during the construction process. As noted in **Table 3.11-1**, these potential project sites do not contain any active cleanup actions that could be affected by project-specific excavation or grading activities. Four potential sites (Arbor Heights ES, Genesee Hill ES, Ballard HS, and Nathan Hale HS) have undergone previous cleanup actions; however, Ecology indicates that those actions have been completed. Ecology has also identified the Arbor Heights ES and Genesee Hill ES sites as being located in an area that is predicted to have concentrations of arsenic and/or lead associated with the Tacoma Smelter Plume between 20 ppm and 40 ppm. As with previous SPS projects, since soil disturbance and excavation would be required as part of site improvement and play area surface conversions on those sites, it would be anticipated that site specific testing would be necessary during the project-specific environmental review and design process to confirm soil conditions for Arbor Heights ES and Genesee Hill ES with submittal of those testing results to Ecology for concurrence.

Under Alternative 2, potential projects in the BEX VI Capital Levy Program include projects that would replace existing synthetic turf at athletic fields with new synthetic turf and projects that would replace grass surface athletic fields and play areas with new synthetic turf. As noted above in **Section 3.11-1**, there are some environmental health considerations that are associated with the use of synthetic turf products, including the usage of TRC infill and potential presence of PFAS within synthetic turf materials. For potential projects involving new or replacement synthetic turf, it would be anticipated that SPS would continue to follow procedures and requirements that have been utilized on recent projects involving the use of synthetic turf. Specifically, it would be anticipated that SPS would utilize alternatives to TRC as infill for its potential athletic field and recreation area projects such as cork infill, Envirofill, or a similar eco-friendly material. For potential projects involving the replacement of existing synthetic turf surfaces, this could result in a beneficial impact as it could include the removal of any TRC infill that may be on specific project sites. Any TRC infill that is encountered on specific sites would be disposed of in accordance with applicable regulations.

In addition, new and replacement synthetic turf projects would continue to follow procedures and requirements from recent SPS projects, including the development of bid documents at the project-specific level to provide clarity and transparency on the presence of PFAS substances in any synthetic turf materials. Bid documents would be required to address certification regarding the presence or absence of PFAS substances, performance data, and testing protocols. Bidders would also be required to submit certification disclosing the presence of any PFAS chemicals in their turf products and certify that synthetic turf systems do not involve any PFAS chemicals during the manufacture process. For potential projects involving the replacement of existing synthetic turf surfaces, this could result in a beneficial impact as it would provide clarity on the status of PFAS within replacement synthetic turf materials when compared with the unknown status of existing turf materials. Existing turf that would be removed as part of replacement projects would be disposed of in accordance with applicable regulations.

System Repair and Maintenance Projects

Construction-related environmental health impacts for building reconfiguration projects would be similar to or less than the impacts identified with replacement buildings, modernization and addition projects discussed above.

Operation Impacts

The following describes potential environmental health impacts that could occur with the operation of potential BEX VI Capital Levy Program projects under Alternative 2.

Replacement School and New Buildings and New Site Projects

Operation of replacement schools and new buildings on new site projects would include compliance with applicable local, state, and federal standards and requirements. No operational environmental health-related impacts would be anticipated.

Modernization and Addition Projects

Operation of modernization and addition projects would include continued compliance with applicable local, state, and federal standards and requirements. No operational environmental health-related impacts would be anticipated.

Building Reconfiguration Projects

Building reconfiguration projects under Alternative 2 would occur within existing facilities to better accommodate SPS program elements or changes to student needs. These projects would not be anticipated to result in operational environmental health impacts.

Athletic Field, Play Area, Site Improvements and Lighting Projects

Operation of athletic field, play area, site improvement and lighting projects would include continued compliance with applicable local, state, and federal standards and requirements. No operational environmental health-related impacts would be anticipated.

System Repair and Maintenance Projects

System repair and maintenance projects under Alternative 2 would occur within the existing footprint of SPS facilities and would not be anticipated to result in operational environmental health impacts.

Cumulative Impacts

Construction associated with potential projects under the BEX VI Capital Levy Program could result in cumulative construction-related impacts in the City of Seattle, particularly in areas where there are other nearby major construction projects. This could result in the potential for cumulative impacts from demolition, excavation and grading activities during the construction process. However, given the urban nature of the City of Seattle and that

potential projects under the BEX VI Capital Levy Program would comply with applicable local, state and federal environmental health standards and regulations, significant impacts from cumulative development would not be anticipated.

Alternative 3 – Improved Conditions with Additions, Modernizations, Play Area, or Field Improvements

Under Alternative 3, SPS would implement a modified selection of potential projects identified for the BEX VI Capital Levy Program. Most notably when compared to Alternative 2, Alternative 3 does not include any replacement school projects or new buildings at new site projects but does include two additional modernization and addition projects (Bailey Gatzert ES and the Skills Center). See **Table 2-1** for a summary of projects assumed for Alternative 3 and a comparison to those identified for Alternative 2.

Construction Impacts

Under Alternative 3, no school replacement projects or new buildings on new site projects are identified. Therefore, construction-related environmental health impacts that could be associated with those types of projects would not occur when compared to Alternative 2. Construction-related environmental health impacts from potential modernization and addition projects would be anticipated to be similar to Alternative 2; however, Alternative 3 assumes that two potential additional modernization/addition projects at Bailey Gatzert ES and the Skills Center would occur. These assumptions for Alternative 3 would result in additional impacts from modernization and addition projects when compared to Alternative 2, but such impacts at Bailey Gatzert ES and the Skills Center would be anticipated to be lower than what could occur with the replacement projects for those sites that are identified under Alternative 2.

Construction-related environmental health impacts from building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects would be the same as described for Alternative 2.

Operation Impacts

The potential BEX VI Capital Levy Program under Alternative 3 would result in similar types of operational environmental health impacts as those identified for Alternative 2; however, the level of operation-related impacts would be lower since there would be no school replacement projects under Alternative 3.

Operational impacts would also be the same as Alternative 2 for building reconfiguration projects; athletic field, play area, site improvements, and lighting projects; and, system repair and maintenance projects.

Cumulative Impacts

Similar to Alternative 2, construction associated with potential projects under Alternative 3 could result in cumulative construction-related impacts in the City of Seattle, particularly in areas where there are other major construction projects. It would be anticipated that the types of potential cumulative impacts would be similar, but the level of impacts would be lower under Alternative 3 since lower levels of development are identified when compared with Alternative 2. Given the urban nature of the City of Seattle and that potential projects would comply with applicable local, state and federal environmental health standards and regulations, significant impacts from cumulative development would not be anticipated.

3.11.3 Mitigation Measures

The following mitigation measures have been identified to further reduce the potential for environmental health impacts associated with potential projects in the BEX VI Capital Levy Program under the EIS Alternatives:

Construction

- A hazardous building materials survey would be conducted during project-specific environmental review and design for potential projects that involve building demolition to detect any potential hazardous building materials and identify appropriate methods for removal and disposal of such materials in accordance with applicable local, state and federal requirements.
- Potential sites have been identified by Ecology within the Tacoma Smelter Plume
 Area and are predicted to have arsenic and/or lead levels between 20 ppm and 40
 ppm (see Table 3.11-1). If excavation and soil disturbance are anticipated as part of
 a specific project on these sites (e.g., Arbor Heights ES, Genesee Hill ES, and West
 Seattle HS), site specific testing would be conducted during the project-specific
 environmental review and design process to confirm soil conditions. Testing results
 would be submitted to Ecology for concurrence.
- As part of the project-specific design process, potential projects on sites with completed cleanup actions (e.g., Arbor Heights ES, Genesee Hill ES, Ballard HS, Chief Sealth International HS, Nathan Hale HS, Seattle World School HS, and West Seattle HS) would ensure that project-related activities would not disturb the completed cleanup conditions as documented by Ecology.
- For potential projects that include new or replacement synthetic turf, SPS would continue to utilize alternatives to TRC infill such as cork infill, Envirofill or a similar eco-friendly infill material. Any TRC infill that is encountered as part of projectspecific development would be disposed of in accordance with applicable regulations.

• Potential projects that include new and replacement synthetic turf would continue to follow procedures and requirements from recent SPS projects, including the development of bid documents at the project-specific level to provide clarity and transparency on the presence of PFAS substances in any synthetic turf materials. Bid documents would be required to address certification regarding the presence or absence of PFAS substances, performance data, and testing protocols. Bidders would also be required to submit certification disclosing the presence of any PFAS chemicals in their turf products and certify that synthetic turf systems do not involve any PFAS chemicals during the manufacturing process.

3.11.4 Significant Unavoidable Adverse Impacts

No known significant unavoidable adverse environmental health impacts are anticipated to result from implementation of the BEX VI Capital Levy Program under the EIS Alternatives. Appropriate project level environmental review would be prepared for individual projects included in the BEX VI Capital Levy Program, and site-specific information about the significance of potential impacts would be further assessed at that time. With appropriate mitigation for each site, no significant adverse environmental health impacts are anticipated.

Comment Letters and Responses

CHAPTER 4 COMMENT LETTERS AND RESPONSES

This chapter of the SPS BEX VI Capital Levy Program Final Programmatic Environmental Impact Statement (FPEIS) contains comments received on the Draft Programmatic Environmental Impact Statement (DEPIS) and provides responses to those comments. The DPEIS was issued by SPS on April 8, 2024. A public meeting was held on April 24, 2024 to solicit comments from the public. The public comment period ended on May 8, 2024 at 5:00 PM. Three letters with comments regarding the DPEIS, and the analysis of environmental impacts were received during the public comment period; one verbal public comment and a written summary of those comments was also provided during the public meeting on April 24th.

Each comment letter that was received during the DPEIS public comment period is included in this section of the FPEIS. Comment letters/numbers appear in the margins of the letters commentary and are cross-referenced to the corresponding responses. Responses to comments are provided directly after each comment letter.

4-1

DPEIS Comment Letters

Letter 1 – Hubbard, Shawn

Letter 2 – Jackins, Chris

Letter 3 – Jackins, Chris (public meeting comment summary)

Letter 4 – Leonard, Michele

1

2

3

May 7, 2024

Mr. Fred Podesta Seattle Public Schools P.O. Box 34165, Mail Stop 22-332 Seattle, WA 98124-1165

Submitted by email to: SEPAcomments@seattleschools.org

Dear Mr. Podesta,

Thank you for the opportunity to submit comments on the Draft Programmatic EIS for the BEX VI Levy. Some of these comments were submitted on February 14, 2024 regarding the Determination of Significance (DS) and scope for the Building Excellence (BEX) VI Programmatic Environmental Impact Statement (EIS). I have added new comments and those that I repeat bear repeating.

Since the Northgate School is my alma mater, I was involved in its demolition and renaming project, so I am familiar with the negative impacts from the BEX V Levy. I ask that improvements be made for the BEX VI Levy.

Sadly, what I learned from that process is that my friends, family and I will not be duped into voting yes on a school building levy again. The school district acts like a greedy machine with its own agenda, often at the expense of good learning. The public is not given due consideration at any step of the way. Democracy is messy, but it must be protected. The public should be given ample ways to participate -- notification of meetings, ease in participating at meetings, and transparent follow-up as to what had transpired at the meetings.

The SEPA reviews process need to be widened and more inclusive of the public.

There is little to no chance for the public to meet with school district representatives to hear what changes are proposed for a school. By the time the public gets to weigh in, it is too late: the plans have been set and the comment periods become a mere formality, basically a sham.

I know this from experience, appealing the rebuilding of Northgate Elementary School.

I naively thought that the SEPA hearings were my chance to give input that would be seriously considered. What I found out is that it was a pretend hearing. Because the school district already had their money and already had their architect/contractor contracts, their minds were made up, public be damned. What was the result? A historically significant building was demolished, a gigantic school has replaced the community green space -- a

too-big school that cannot even be filled because of dropping enrollment – and the name is changed for the aspired political gain of board members who are no longer on the board and of a principal who is no longer that school's principal. Plus, the selected name was used in direct opposition to the request by the family of the supposed honored one – James Baldwin's family be damned.

3 Cont.

The review of historic and cultural resources needs to be given more attention and value.

Regarding lack of public inclusion: The public needs to have prior and ample notice as to which Landmarks Board meetings are discussing which particular school. The Northgate School Landmarks meeting was packed with people whom the school principal had personally invited, but everyone else was left in the dark.

4

Another example of exclusion: The Duwamish Tribe was not originally consulted by the school district as part of the review process for Northgate School. The hearing examiner (eventually) admonished the school district for this disregard. The Duwamish Tribe should always be included, per School Board Resolution 2016-17-1.

5

Cumulative district-wide impacts need to be included in environmental reviews.

Most, if not all, of the school construction projects have adverse impacts on the environment. The combined effects of all school projects need to be considered and the weight of their cumulative and total impacts needs to be part of the equation. Making changes in phases may be a way for the school district to avoid a full environmental review, but bit-by-bit these accumulative changes degrade the environment of the city as a whole. Considering each project as its own island is also a way for the school district to divide and conquer the public by taking away their standing as an affected citizen of the city.

6

Thank you for your consideration of my comments.

Ms. Shaun Hubbard 626 38th Avenue Seattle WA 98122 shaunalice@gmail.com

RESPONSE TO LETTER 1

Hubbard, Shawn

 Comments regarding previous SPS projects, including James Baldwin Elementary School (former known as Northgate Elementary School), are noted. James Baldwin Elementary School is not included as part of the BEX VI Capital Levy Program.

As noted in **Chapter 2** of this FPEIS, public notification and participation opportunities were provided as part of the PEIS process. Issuance of a Determination of Significance and initiation of the public scoping process for the PEIS was provided on January 16, 2024. The public scoping period was open for 30-days (until February 15, 2024) during which time, agencies, tribes and the public were invited to provide comments on the scope of the PEIS. Notice of the scoping period was posted on the SPS website and published in the *Daily Journal of Commerce* on four separate occasions from January 16, 2024 through January 25, 2024.

Upon issuance of DPEIS, a public comment period was provided from April 8, 2024 through May 8, 2024 to solicit public comments on the DPEIS. A public comment meeting was also held on April 24, 2024 which included a virtual participation option to allow community members to participate remotely via computer. All comments that were received during the DPEIS public comment period are included in this chapter.

In addition, public engagement opportunities will continue to be provided for the community to provide comments and feedback on the proposed BEX VI Capital Levy Program and project lists as the program and project list continues to develop in 2024.

2. SPS's notification and public comment process meets the requirements of the State of Washington SEPA Rules (WAC 197-11) and SPS SEPA Policies (Board Policy 6890), including public notification and public comment period timeframes. As noted in the response to Comment 1, the public scoping period for the DPEIS was open for 30-days (January 16 through February 15, 2024) and a notice of the scoping period was posted on the SPS website and published in the *Daily Journal of Commerce* on four separate occasions from January 16, 2024 through January 25, 2024. Upon issuance of the DPEIS, a public comment period was provided from April 8, 2024 through May 8, 2024 to solicit public comments on the DPEIS. A public comment meeting was also held on April 24, 2024 which included a virtual participation option to allow community members to participate remotely via computer.

As noted in Chapter 2, the purpose of a Programmatic EIS is to evaluate potential impacts associated with implementing the BEX VI Capital Levy Program. Since specific details of potential projects under the BEX VI Capital Levy Program are not known at this time, SPS has prepared a programmatic or non-project level EIS in accordance with SEPA (WAC 197-11). SPS will conduct supplemental project-specific environmental review, as appropriate, when projects are ultimately selected for development under BEX VI. Supplemental environmental review could include SEPA Checklists, EISs, or an addendum to this programmatic EIS, depending on the type of project. During that supplemental

- environmental review, there would be additional public comment periods for the community to provide feedback on more specific details of potential individual projects.
- 3. The comment regarding the SEPA process for previous SPS projects is noted. As indicated above, a public meeting was held for the DPEIS; however, no SEPA hearings have taken place for the BEX VI Capital Levy Program at this time. An analysis of historic resources and potential impacts from the BEX VI Capital Levy Program is provided in **Section 3.9**, including a summary of historic status for potential sites and identification of measures to minimize impacts to historic resources.
- 4. An analysis of historic and cultural resources is provided in Section 3.8 and Section 3.9 of this FPEIS, respectively. Section 3.9, Historic Resources, provides an overview of the City of Seattle's Landmark Preservation Ordinance, the Washington Heritage Register, and the National Register of Historic Places. The Landmarks process is separate from SEPA and is managed by the City of Seattle. Table 3.9-1 identifies the historic status potential of each of the potential sites under the BEX VI Capital Levy Program, including Seattle Landmark listing status. Section 3.9.3 discusses potential impacts that could occur under the alternatives and Section 3.9.4 identifies measures to minimize impacts to historic resources, including evaluation of any buildings over 45 years of age for eligibility as a Seattle Landmark. Potential projects involving Seattle Landmarks will require review and approval by the City's Landmarks Preservation Board and issuance of a Certificate of Approval by the City's Department of Neighborhoods.
- 5. The comment regarding notification for the Duwamish Tribe as part of the James Baldwin Elementary Project is noted. It is customary practice that SPS notifies the Duwamish Tribe (and other local tribes) as part of the SEPA process. The Duwamish Tribe, Muckleshoot Tribe, Snoqualmie Tribe, Suquamish Tribe, and Tulalip Tribe were all notified of the publication and distribution of the DPEIS and the associated comment period (see **Appendix A**, Distribution List for further details).
- 6. As discussed in Chapter 2, Project Description, the FPEIS evaluates the potential direct, indirect and cumulative impacts that could occur with the proposed alternatives and is intended to serve as a tool to provide the public, agencies and decision-makers with information regarding the potential ranges of environmental impacts that would be associated with implementation of the BEX VI Capital Levy Program. Potential impacts are evaluated in this document at a non-project or programmatic level since specific project details are not available at this time. A non-project or programmatic action is defined as an action that is broader than a single site-specific project, and involves decisions on policies, plans, or programs. An EIS for a non-project proposal does not require site-specific analysis; instead, the EIS addresses conditions at a more general level.

As appropriate, supplemental environmental review of specific projects under the BEX VI Capital Levy Program would be conducted when potential projects are ultimately selected for development under BEX VI and sufficient details are available for each project. Future project-specific environmental review would depend on the details of each individual project and could include either a SEPA Environmental Checklist, a supplemental EIS, or an addendum to this FPEIS.

To: Fred Podesta, District SEPA Official Fred Podesta, Chief Operating Officer Seattle Public Schools MS 22-183 PO Box 34165, Seattle, WA 98124

Phone: 206-252-0102; FAX 206-252-0626

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

REGARDING: Comments on Draft Programmatic EIS (DPEIS) for the Building Excellence 6 (BEX VI) Program.

Comments due by: Wednesday May 8, 2024 (SEPA – State Environmental Policy Act)

Dear Fred Podesta,

Attached are some comments on the Draft Programmatic EIS (DPEIS) Building Excellence 6 (BEX VI) Program.

Sincerely, Chris Jackins

- The DPEIS concludes that there are "no significant unavoidable adverse impacts" from BEX VI. We disagree.
 - A. The DPEIS uses the same language for each environmental element to state that "With appropriate mitigation for each site, no significant adverse....impacts are anticipated."
 - B. The presumption of "appropriate mitigation" seems to be a magic phrase applied by the DPEIS to pretend to "solve" all probable significant adverse environmental impacts.
 - a. This covers air quality (page 1-14), trees and environmentally critical areas (page 1-16), energy (page 1-17), noise (page 1-18), land use (page 1-19), aesthetics/light and glare (page 1-20), recreation (page 1-21), cultural resources (page 1-22, 1-23), historic resources (page 1-23, 1-24), transportation (page 1-25, 1-26), environmental health (page 1-27).
 - C. The presumption of "appropriate mitigation" is an error in the BEX VI DPEIS, as it improperly ignores the context of failings and deliberate policies of the Seattle Public Schools that undercut SEPA review. The Wilson-Pacific school project is a relevant example. For the BEX VI DPEIS to ignore the example of the Wilson-Pacific school project is to ignore reality.
 - a. On the Wilson-Pacific school project, the City of Seattle Landmarks Preservation Board formally approved designation of the existing school and site as a landmark due its importance to the Native American community. The highly regarded prior principal (Robert Eagle Staff) at the Indian Heritage school served at the Wilson-Pacific site, and Licton Springs which runs through the site with centuries of connections to the Native community.
 - b. The City landmark approval occurred prior to a District SEPA DNS administrative appeal hearing.
 - c. The School District regularly pledges at SEPA-related venues related to its projects that City Landmarks Board review will provide adequate mitigation for any impacts to historic and cultural resources.
 - d. The District made such a pledge at the SEPA appeal hearing it held on its DNS decision on the Wilson Pacific project. But at this same hearing, the District failed to reveal to the Hearing Examiner and to appellants that just days before the

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hearing, the District had filed a lawsuit against the City Landmarks Board challenging the Landmarks Board's authority on the Wilson Pacific project.

- 2 Cont.
- e. The failure to divulge this information at the hearing was not because the District representative at the hearing was unaware of the lawsuit; the same District representative had filed the lawsuit.
- f. On August 4, 2014, the Seattle School District filed a lawsuit against the Landmarks Board (King County Superior Court Case #14-2-21496-1 SEA). In its lawsuit, the District states its long-held view that the Landmarks Board has NO authority over School District buildings; specifically the lawsuit asks a court to declare the City Landmarks Ordinance SMC 25.12 "unconstitutional" and "invalid as applied to the District" [page 2; page 8, section 4.4; page 11, section 9.1]
- g. The lawsuit ended up being part of the pressure that the District applied to secure a decision by the Landmarks Board to impose "no controls" on the Wilson Pacific landmark (October 15, 2014), allowing the District to demolish the landmarked building at the site.
- h. To have a valid PEIS, the PEIS must explicitly reject the District's view that the City of Seattle Landmarks Preservation Board has NO authority over School District buildings.
- 2. We appreciated the DPEIS giving a summary of Scoping comments on BEX VI from three letters received including ours [page 2-6, 2-7].
 - A. We had noted that "Programmatic review should include cumulative impacts".
 - a. The DPEIS states that the DPEIS "includes cumulative impacts" thank you (section 2.4, page 2-7)
 - B. We had noted that programmatic review should include "forever chemicals"/PFAS in the plastic grass of artificial turf.
 - a. The DPEIS states that "in response to comments received during the scoping period, SPS has also identified and added Environmental Health as an element for analysis in this DPEIS" – thank you [section 2.4, page 2-7]
 - C. The DPEIS states that "Several other comments were provided that were not related to the BEX VI Capital Levy Program or the scope of this DPEIS, including: concerns regarding prior SPS projects; issues with remote learning; issues with the use of electronic devices at schools; and the makeup of student enrollment". [section 2.4, page 2-7]
 - a. We continue to believe that these issues are relevant to the environmental review:
 - "Prior SPS Projects". This topic relates to SEPA review as described in the
 example of the Wilson Pacific project, but also to cumulative impacts.
 For a proper consideration of cumulative impacts, the PEIS needs to look more
 broadly at what has been happening over a longer period of time.

The Final PEIS should provide a detailed context with respect to BEX programs since 1995 through inventories and changes for:

- Historic and cultural resources;
- Playground space;
- Trees;
- Onsite ADA parking;
- Field lighting; and,
- Artificial turf, including which fields have crumb rubber filler.

What are the trends, and how would BEX VI affect these trends?

Have certain impacts reached a point that call for alteration to certain BEX VI projects?

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• "Issues with remote learning" and "issues with the use of electronic devices at schools". Building designs that emphasize teaching by machines and screens rather than by humans will have health impacts on students, staff and parents.

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- "The makeup of student enrollment". The School District regularly applies for state matching funds for its construction projects. In order to receive funds, the District is required to build its projects in a way that avoids creating or aggravating racial imbalance with respect to school enrollment and the requirements of WAC 392-342-025 as overseen by the Office of Superintendent of Public Instruction (OSPI). OSPI should be included in the list of state agencies listed under "permits and approvals" on page iv of the DPEIS.
- D. The DPEIS did not reference our scoping comments that "The process of SEPA review needs to be improved in order to be adequate."
 - a. We continue to believe that these comments are relevant to the DPEIS environmental review.
 - b. In its analysis, the DPEIS programmatic review references and sets the context for analysis as one where subsequent project specific review will mitigate impacts.
 - If this subsequent review is flawed, as it has been, it will lead to greater probable adverse impacts.
 - c. We expect these concerns again here:
 - The process of SEPA review needs to be improved in order to be adequate.
 - The SEPA administrative appeal process excludes members of the public who do not have email access. This is prejudicial and limits adequate review.
 - The SEPA administrative appeal process previously included multiple Hearing Examiners to allow for a greater variety of viewpoints, but the District now only provides a single Examiner.
 - SEPA public meetings need to be restored. For decades, the District held public meetings to discuss Draft Environmental Checklists and Draft EISs. The District dropped these meetings starting in late 2019; this was before, and had nothing to do with the coronavirus pandemic.
 - SEPA review should include much greater detail, to make up for the likelihood that decision-makers such as the School Board now rarely examine SEPA information, or project and environmental details at all, with most project plans and budgets put into the Board's Consent Agenda and adopted without Board public discussion.
- 3. We appreciate that the DPEIS includes a Distribution List. [Appendix A]
 - A. The second to last entry in the list is "Chris Jackins Committee to Save Seattle Schools".
 - B. A more accurate entry would be "Chris Jackins Seattle Committee to Save Schools".
 - C. Although the DPEIS was issued on April 8, 2024, as of April 22, 2024 we had not received a copy of the DPEIS.
 - D. Prior to April 8, 2024, we had also separately left a phone message (at 206-252-0641) to request that we be sent a copy of the DPEIS, as the hearing notice had instructed.
- 4. The project summaries incorrectly omit the Rainier Beach High School site [Table 2-2, page 2-14].
 - A. The \$10 million cost overrun on the current Rainier Beach High School project was specifically expected to be covered within the BEX VI levy [June 21, 2023, School Board action].
 - B. The \$10 million section of work for the Rainier Beach High School project is connected to and dependent on the BEX VI levy and should be reviewed in the DPEIS. It should not be hidden from the public.

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- A. The Seattle Landmarks Preservation Board and Governor's Executive Order (GEO) 21-2 should also be included in the list of state agencies listed under "permits and approvals" on page iv and v of the DPEIS.
- Pre-construction subsurface explorations on projects need to be the norm when looking at subsurface cultural resources related to Indian Tribes, and especially those related to the Duwamish Tribe.

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- A. Appeals by the public should not be necessary to receive such review.
- B. Pre-construction subsurface explorations were required by the District's Hearing Examiner after appeals by our Committee of DNS decisions at both Northgate Elementary (now James Baldwin) and Rainier Beach High School. These appeals included representatives of the Duwamish Tribe.
- C. The City of Seattle and Seattle Public Schools are named after a Duwamish Chief: Chief Seattle.
- D. On October 12, 2016 the Seattle School Board approved School Board Resolution 2016/17-1 supporting Treaty rights and benefits for the Duwamish Tribe.
- 7. The DPEIS reached an incorrect conclusion that "no significant adverse environmental health impacts are anticipated" with regard to forever chemicals/PFAS in the plastic grass of artificial turf [page 3.11-17, section 3.11.4]. The proposed projects to install synthetic turf have probable significant adverse impacts, which are avoidable by not using synthetic turf. It is embarrassing that the Seattle Public Schools environmental review is bending over backwards to try to allow these wrong things to keep happening.

- A. The DPEIS cites to several studies on PFAS to conclude that "the presence of fluorinated substances in synthetic turf does not appear to pose an exposure concern to users of the field". [page 3.11-8]
- B. The DPEIS cites to test results provided by manufacturers to conclude that "their products contain very low levels of PFAS that do not represent a human health risk". [pages 3.11-8 and 3.11-9]
- C. The DPEIS further notes that "In addition, for more recent SPS projects involving the use of synthetic turf, such as the ones occurring at Maple Elementary and John Muir Elementary, the bid documents for each project are being prepared to provide clarity and transparency on the presence of PFAS substances in any synthetic turf materials. Bid documents will be required to address certification regarding the presence or absence of PFAS substances, performance data, and testing protocols. Bidders will be required to submit appropriate and verifiable certification disclosing the presence of any PFAS chemicals in their turf products, the testing methods used, and the thresholds applied to provide such certification. Bidders will also be asked to certify that their synthetic turf system does not involve any PFAS chemicals to manufacture the components of their synthetic turf products". [page 3.11-9]
- D. These cited conditions were imposed by the Hearing Examiner after appeals filed by our Committee of the DNS decisions on Maple and John Muir.
- E. The DPEIS states that these conditions will be applied to all BEX VI synthetic turf projects. [page 3.11-17]

- F. The DPEIS neglects to cite to some references cited by appellants that contributed to the Examiner's imposing these conditions, such as:
 - a. A Position Paper by the Children's Environmental Health Center of the Icahn School of Medicine at Mount Sinai flatly states that the Center, quote, "recommends against the installation of artificial turf playing surfaces and fields due to the uncertainties surrounding the safety of these products and the potential for dangerous heat and chemical exposures", unquote. [page 1, Position Paper, "The Children's Environmental Health Center Recommendations....against the installation of artificial turf playing surfaces", Icahn School of Medicine at Mount Sinai, Institute for Climate Change, Environmental Health, and Exposomics, November 2023]
 - The same paper notes that "Undisclosed chemicals of concern are present in plastic grass blades and turf pads and matting".
 - It states that "A recent study identified per- and poly-fluoroalkyl substances (PFAS, aka Teflon chemicals), a class of more than 5,000 chemicals linked to numerous health problems including cancer, nervous system toxicity, immunity dysfunction, thyroid, and cardiovascular disease in the plastic grass blades and backing used on artificial turf fields and in adjacent bodies of water." [page 2]
 - It states that "To allow the installation of PFAS-containing surfaces would be extremely short-sighted as further restrictions and regulations on these chemicals are likely to come". [page 3]
 - This should not be an "iffy" issue to the authors of the DPEIS.
 - The American Academy of Pediatrics has noted that "researchers found that concussion risk may be higher for athletes playing on synthetic turf fields compared with natural grass". [News Release, "Synthetic Fields for Sports May Pose Increased Risk of Concussion in Youth", American Academy of Pediatrics, October 7, 2022]
 - c. A recent Seattle Times article on PFAS quoted US Senator Patty Murray as saying that "We know that long-term exposure to PFAS is harmful and dangerous" and that quote, "We need a whole-of-government approach to tackling PFAS contamination and as a Chair of the Appropriations Committee, I am working hard to make sure we jump at every possible opportunity to address PFAS" unquote. [Military testing reveals hundreds of PFAS-tainted drinking water wells, Seattle Times, December 12, 2023]
 - d. The DPEIS was issued on April 8, 2024. Days later, the Environmental Protection Agency/EPA issued limits on "forever chemicals" in drinking water. The Seattle Times article on this issue stated "The EPA's legally enforceable limits for two of the most persistent of these chemicals, PFOA and PFOS, are set at 4 parts per trillion, which is less than half the advisory levels that were put in place by Washington state in 2021. The EPA is also setting a nonenforceable goal of zero, which the agency says reflects the latest science that shows there is no level of exposure to these contaminants without risk of health effects, including certain cancers." [EPA unveils limits on forever chemicals in drinking water, Seattle Times, April 11, 2024]

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RESPONSE TO LETTER 2

Jackins, Chris

1. The comment regarding impacts and mitigation measures is noted. The FPEIS includes a programmatic analysis of potential impacts that could occur under the EIS Alternatives with the BEX VI Capital Levy Program and identifies measures to minimize potential impacts. Potential impacts are evaluated in this document at a non-project or programmatic level since specific project details are not available at this time. A non-project or programmatic action is defined as an action that is broader than a single site-specific project, and involves decisions on policies, plans, or programs. An EIS for a non-project proposal does not require site-specific analysis; instead, the EIS addresses conditions at a more general level.

As appropriate, supplemental environmental review of specific projects under the BEX VI Capital Levy Program would be conducted when sufficient details are available for each project and would include an analysis of potential project-specific impacts and applicable project-specific mitigation measures. Future project-specific environmental review would depend on the details of each individual project and could include either a SEPA Environmental Checklist, a supplemental EIS, or an addendum to this FPEIS.

2. The Landmark decision and lawsuit regarding the Wilson-Pacific School are not related to the SEPA process for the BEX VI Capital Levy Program. This FPEIS provides a programmatic environmental review of the potential projects under the BEX VI Capital Levy Program, including an analysis of cultural resources (**Section 3.8**) and historic resources (**Section 3.9**) and associated mitigation measures.

An analysis of historic resource regulations, conditions and potential impacts is provided in **Section 3.9**, Historic Resources. **Table 3.9-1** summarizes the historic listing status for each of the potential sites under the BEX VI Capital Levy Program. Mitigation measures to minimize potential impacts to historic resources are identified in **Section 3.9.4**, including:

- Potential projects involving designated Seattle Landmarks will require review and approval by the Landmarks Preservation Board and issuance of a Certificate of Approval by the Seattle Department of Neighborhoods (DON).
- Any building over 45 years of age that has not previously been evaluated for eligibility as a Seattle Landmark, will require a historical analysis by the DON Historic Preservation staff and/or referral to the Landmarks process as part of the MUP process. If the property is subsequently designated a Seattle Landmark, potential changes will require a Certificate of Approval.
- When planning potential projects involving designated or eligible historic resources, SPS and its selected design team should consider character-defining features from the outset of the project and craft a sensitive approach to avoid or minimize potential adverse impacts.

- 3. The comment regarding including cumulative impacts in the DPEIS is noted.
- 4. The comment regarding the addition of an environmental health section in the DPEIS is noted.
- 5. A programmatic discussion of cumulative impacts is provided in the FPEIS for each of the environmental elements as it relates to potential future development that could occur.

Programmatic SEPA review was completed as part of the environmental review process for each of the previous BEX capital levies, including the BEX V capital levy in 2019 and the BEX IV capital levy in 2012. In addition, projects that were selected under the previous BEX capital levies also underwent project-specific environmental review, as appropriate, to provide subsequent environmental analysis on the specifics of those particular projects and identify specific mitigation measures related to each of those individual projects.

- 6. The comment regarding remote learning is noted. Remote learning is not related to the SEPA process for the BEX VI Capital Levy Program.
- 7. The comment regarding the Office of Superintendent of Public Instruction (OSPI) is noted. OSPI provides assistance with the funding of school construction projects, but that funding process is not a project permit or approval, which is what that particular section of the FPEIS is addressing.
- 8. SPS's SEPA process and SEPA policies (SPS Policy No. 6890) follow and are consistent with the Washington State Environmental Policy Act (RCW 43.21C.120) and the SEPA Rules identified in the Washington Administrative Code (WAC 197-11).
- 9. The comments regarding the Distribution List are noted. The Distribution List is included as Appendix A to this FPEIS. SPS provided a hard copy of the BEX VI Capital Levy Program DPEIS to Mr. Jackins on April 24, 2024.
- 10. Funds from the BEX VI Capital Levy Program could be utilized for the continuing construction of the Rainier Beach High School Project. Programmatic environmental review was already conducted for the Rainer Beach High School Project as part of the BEX V and BTA V Capital Levy Programs and project-specific SEPA review was conducted and completed for the project in 2021. The BEX V PEIS, BTA V PEIS and project-specific SEPA review documents are incorporated by reference in this FPEIS and are available upon request from SPS. The Rainier Beach High School Project has not changed since those analyses and further SEPA review of that project is not necessary.
- 11. The comment regarding Governor's Executive Order 21-02 (GEO 21-02) and the Seattle Landmarks Preservation Board is noted. **Section 3.8**, Cultural Resources, provides a discussion on GEO 21-02 which is applicable for potential projects that utilize State capital funds. Compliance with GEO 21-02 for those potential projects that utilize State funding will require consultation with DAHP and affected tribes as part of the project-level review of potential impacts. Once specific funding sources are identified for a potential project, compliance with GEO 21-02 would be reviewed, as necessary, as part of project-specific planning and project-specific environmental review. **Section 3.9**,

Historic Resources, provides a discussion on the Seattle Landmarks Preservation Board process and how it would be applicable to potential projects under the BEX VI Capital Levy Program. The Fact Sheet has also been updated to reflect the potential review and approval by the Landmarks Preservation Board and under GEO 21-02, depending on the specific details of individual potential projects.

12. The comment regarding cultural resource subsurface explorations is noted. As indicated in **Section 3.8**, Cultural Resources, a cultural resource assessment would be completed for most individual projects under the BEX VI Capital Levy Program as part of project-specific planning and project-specific environmental review. When field conditions allow (e.g., project areas that are not covered with impervious surface or underground utilities that would prohibit explorations) and a subsurface investigation is determined to be warranted, assessments would include subsurface testing or monitoring of geotechnical investigations.

Section 3.8 also identifies mitigation measures for cultural resources including that for projects assessed as having a very high potential to adversely impact other cultural resources due to their unique natural or cultural setting, SPS would prepare a Monitoring and Inadvertent Discovery Plan (MIDP) and an archaeologist would actively monitor high risk construction ground disturbance. SPS would notify tribal representatives of the project schedule at least one week in advance of commencement of ground disturbance. Tribal representatives may also attend site visits to observe construction ground disturbance.

Preparation of cultural resource assessments for specific potential projects under the BEX VI Capital Levy Program would also include notification to affected tribes, including the Duwamish Tribe. In addition, specific projects that require compliance with GEO 21-02 would require consultation with affected tribes (including the Duwamish Tribe) as well as DAHP.

13. The comments regarding synthetic turf are noted. As discussed in Section 3.11, Environmental Health, PFAS are manufactured chemicals that have been used in industry and consumer products since the 1940s and are found in many different consumer, commercial, and industrial products, as well as at low levels in a variety of food products. The FPEIS notes that scientific studies have shown that high exposure to some types of PFAS can be linked to some harmful health effects in humans and animals. Research is currently ongoing to determine how exposure to different types of PFAS can lead to a variety of health effects and the US Environmental Protection Agency (EPA) is leading several research initiatives to better understand the risks of PFAS and develop new and more effective methods to identify and measure PFAS (EPA, 2024).

Some synthetic turf materials have been known to contain PFAS (many of which also related to tire rubber crumb [TRC] infill); however, it should be noted that not all turf manufacturers utilize the same products and methods for manufacturing. As documented by a New Jersey Department of Environmental Protection technical memorandum, it is not appropriate to generalize about PFAS in all synthetic turf since variabilities in manufacturing processes and materials can impact the PFAS content and potential leachability (New Jersey Depart of Environmental Protection, 2023). As

¹ Very high potential as identified by the DAHP predictive model and summarized in Table 3.8-3.

indicated in the FPEIS, most of the suppliers that SPS currently utilizes have documented and confirmed to SPS that their products do not utilize PFAS chemicals in their manufacturing process.

As noted in **Section 3.11**, mitigation measures have been identified to reduce the potential for environmental health impacts associated with potential synthetic turf projects under the BEX VI Capital Levy Program, including:

- For potential projects that include new or replacement synthetic turf, SPS would
 continue to utilize alternatives to TRC infill such as cork infill, Envirofill or a similar
 eco-friendly infill material. Any TRC infill that is encountered as part of projectspecific development would be disposed of in accordance with applicable
 regulations.
- Potential projects that include new and replacement synthetic turf would continue
 to follow procedures and requirements from recent SPS projects, including the
 development of bid documents at the project-specific level to provide clarity and
 transparency on the presence of PFAS substances in any synthetic turf
 materials. Bid documents would be required to address certification regarding the
 presence or absence of PFAS substances, performance data, and testing
 protocols. Bidders would also be required to submit certification disclosing the
 presence of any PFAS chemicals in their turf products and certify that synthetic
 turf systems do not involve any PFAS chemicals during the manufacturing
 process.
- 14. The comment regarding the Mount Sinai paper on artificial turf playing surfaces and fields is noted. SPS continues to review current research and guidance regarding PFAS and synthetic turf surfaces. Research and guidance regarding PFAS itself is a continually evolving science. Information from the Washington State Department of Health indicates that since PFAS is water soluble, it can contaminate drinking water and that the primary human exposure pathway is ingesting contaminated drinking water (see the responses to Comment 16 and 17 for further discussion on drinking water). Exposure from skin contact or use of consumer products is typically at a lower level. The primary focus of PFAS research to date has been on two specific compounds: perfluoro octane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) which have been voluntarily eliminated from most production in the US and while research continues to occur and evolve there are data gaps in current research and potential replacement compounds (Washington State Department of Health, 2024).

To date, very few studies have looked at the health risks associated with synthetic turf use and most studies that have been conducted to date have been limited in scope and only assessed the effects of tire rubber crumb infill. Additional studies are needed to further assess the potential level of exposure to hazardous chemicals from all artificial turf components (Warner, 2022).

With that in mind, SPS has also reached out to several local organizations for information on additional guidance or planned research regarding synthetic turf fields. Seattle Children's Hospital indicated that they have not conducted any studies on PFAS exposure or associated synthetic turf use and indicated that there are very few studies that actually look at health impacts from synthetic turf. The Northwest Pediatric Environmental Health Specialty Unit also indicated that they are not aware of any

research that has been or is currently being conducted on PFAS exposure from synthetic turf fields. The Washington State Department of Health – Office of Environmental Public Health Services responded by stating that "While it cannot be ruled out the possibility that there are health effects from artificial turf that have not been detected yet, there is overwhelming research that physical activity is good and beneficial to people's physical and mental health. It is recommended that people continue to play as the benefits to a variety of health outcomes across the life span are clear." Additionally, the Department of Health is planning for further study of synthetic turf fields in the future but there is no current timeline or funding for such work (SPS, 2024).

In light of the evolving science, the FPEIS notes, as outlined in the response to Comment 13, that mitigation measures have been identified to reduce the potential for environmental health impacts associated with potential synthetic turf projects under the BEX VI Capital Levy Program, including utilizing alternatives to TRC infill such as cork infill, Envirofill or a similar eco-friendly infill material and requiring bidders to submit certification disclosing the presence of any PFAS chemicals in their turf products and certifying that synthetic turf systems do not involve any PFAS chemicals during the manufacturing process.

- 15. The comment regarding concussion risk is noted. As indicated in the response to Comment 14, the Washington State Department of Health has stated that "While it cannot be ruled out the possibility that there are health effects from artificial turf that have not been detected yet, there is overwhelming research that physical activity is good and beneficial to people's physical and mental health. It is recommended that people continue to play as the benefits to a variety of health outcomes across the life span are clear."
- 16. The comment regarding PFAS in drinking water wells is noted. As indicated in the response to Comment 14, primary human exposure pathway for PFAS is ingesting contaminated drinking water. Very few studies have looked at the health risks associated with synthetic turf use and most studies that have been conducted to date have been limited in scope and only assessed the effects of TRC infill. It should be noted that drinking water quality is regulated by the federal government including the US Environmental Protection Agency (EPA) under the Clean Water Act and Safe Drinking Water Act. Also, the City of Seattle does not utilize groundwater or water wells for its drinking water supply.
- 17. The comment regarding EPA issued limits on PFAS in drinking water is noted. As indicated in the FPEIS and the response to Comment 13, mitigation measures have been identified to reduce the potential for environmental health impacts associated with potential synthetic turf projects under the BEX VI Capital Levy Program, including requiring bidders to submit certification disclosing the presence of any PFAS chemicals in their turf products and certifying that synthetic turf systems do not involve any PFAS chemicals during the manufacturing process. As noted in the response to Comment 16, drinking water quality is regulated by the federal government, including the US EPA, and the City of Seattle does not utilize groundwater or water wells for drinking water.

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File bex vi hearing statement on draft eis

TO: Fred Podesta, District SEPA Official Fred Podesta, Chief Operating Officer Seattle Public Schools, MS 22-183 P.O. Box 34165, Seattle WA 98124

Phone: 206-252-0102; FAX 206-252-0626 Email: SEPAComments@seattleschools.org FROM: Chris Jackins, Coordinator
Seattle Committee to Save Schools
P.O. Box 84063, Seattle WA 98124
206-521-3288

REGARDING: Comments on Draft Programmatic EIS (DPEIS) for the Building Excellence 6 (BEX VI) Program

Comments due by: Wednesday May 8, 2024

Draft DPEIS for BEX VI available at https://www.seattleschools.org/departments/sepa

(SEPA - State Environmental Policy Act)

My name is Chris Jackins. I am the Coordinator of the Seattle Committee to Save Schools.

I have some comments on the Draft Programmatic EIS (DPEIS) for the Building Excellence 6 (BEX VI) Program. I am also submitting a more detailed comment letter. Thirteen points:

- 1. The presumption of "appropriate mitigation" is an error in the DPEIS, as it ignores the context of policies of the Seattle Public Schools that undercut SEPA review.
- 2. On August 4, 2014, the Seattle School District filed a lawsuit against the City of Seattle Landmarks Preservation Board. [King County Superior Court Case # 14-2-21496-1 SEA] In its lawsuit, the District states its long-held view that the Landmarks Board has NO authority over School District buildings. To have a valid PEIS, the PEIS must explicitly reject this view.
- 3. The DPEIS "includes cumulative impacts" thank you. [section 2.4, page 2-7]
- 4. The DPEIS includes 'forever chemicals' / PFAS in the plastic grass of artificial turf thank you. [section 2.4, page 2-7]
- 5. For a proper consideration of cumulative impacts, the PEIS needs to look more broadly at what has been happening over a longer time period.
- 6. The Final PEIS should provide a detailed context with respect to BEX programs since 1995 through inventories and changes for:
 - historic and cultural resources;
 - playground space;
 - trees;
 - onsite ADA parking;
 - field lighting; and,
 - artificial turf, including which current fields have crumb rubber filler.
 - What are the trends, and how would BEX VI affect these trends?
 - Have certain impacts reached a point that call for alteration of certain BEX VI projects?
- 7. The process of SEPA review needs to be improved in order to be adequate.
- 8. Prior to April 8, 2024, I had requested a copy of the DPEIS. As of April 22, 2024 I had not received a copy of the DPEIS.

- 9. The project summaries incorrectly omit the Rainier Beach High School site. [Table 2-2, page 2-14] The \$10 9 million cost overrun on the current Rainier Beach High School project was specifically expected to be covered within the BEX VI levy. [June 21, 2023, School Board action]
 - 10
- 10. Pre-construction subsurface explorations on projects need to be the norm when looking at subsurface cultural resources related to Indian Tribes, and especially for those related to the Duwamish Tribe.
- 11
- 11. The DPEIS reached an incorrect conclusion that "no significant adverse environmental health impacts are anticipated" with regard to 'forever chemicals' / PFAS in the plastic grass of artificial turf. [page 3.11-17. section 3.11.4]
- 12. A Position Paper by the Children's Environmental Health Center of the Icahn School of Medicine at Mount Sinai flatly states that the Center, quote, "recommends against the installation of artificial turf playing surfaces and fields due to the uncertainties surrounding the safety of these products and the potential for dangerous heat 12 and chemical exposures", unquote. [page 1, Position Paper, "The Children's Environmental Health Center Recommendations ... against the installation of artificial turf playing surfaces", Icahn School of Medicine at Mount Sinai, Institute for Climate Change, Environmental Health, and Exposomics, November 2023]
- 13. The DPEIS was issued on April 8, 2024. Days later, the Environmental Protection Agency / EPA issued limits on "forever chemicals" in drinking water.

Thank you.

RESPONSE TO LETTER 3

Jackins, Chris (public meeting)

- 1. See the response to Letter 2, Comment 1 and Comment 2.
- 2. See the response to Letter 2, Comment 2.
- 3. See the response to Letter 2, Comment 3.
- 4. See the response to Letter 2, Comment 4.
- 5. See the response to Letter 2, Comment 5.
- 6. See the response to Letter 2, Comment 5.
- 7. See the response to Letter 2, Comment 8.
- 8. See the response to Letter 2, Comment 9.
- 9. See the response to Letter 2, Comment 10.
- 10. See the response to Letter 2, Comment 12.
- 11. See the response to Letter 2, Comment 13.
- 12. See the response to Letter 2, Comment 14.
- 13. See the response to Letter 2, Comment 17.

Subject: SEPA comments

SEPA, PEIS EIS comments.

Please extend the comment time period for this document.

The **One Seattle Plan** has not been finalized. That document, One Seattle Plan, is for the entire City of Seattle and includes plans for housing, zoning for housing, environment, infrastructure and transportation issues. It is important for the School District and the Seattle City plans to be in agreement, for Seattle's future, complimenting each other in their endeavor to take care of the students and families in Seattle. What is the use of a plan if it spends most of the time in court for not following the cities, county, or state plans, especially in regards to environmental issues like trees, urban forest, wildlife habitat, neighborhood parking, neighborhood green space, street usage, sidewalks, walkability, bikeable areas, busing, and other areas (public and private) of concern for a growing city. Another reason to extend the comment time is that very few people even know this plan exists. People in the neighborhoods that the BEX VI Capitol Levy will influence, have no

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warning about what is to happen or why. Every neighborhood needs to be aware when or where construction will occur. Information needs to be in a written form, delivered to each resident and commercial business mailbox within a 2-mile radius of where each construction project will occur. Sending information home with students may seem like enough notice, but the reality is: not every home within a 2-mile radius of the construction sites will have children. People near schools, are extremely vested in their neighborhoods, as can be proven by the cost of homes. They need a clear description and reasonable time period to comment. Businesses also need to be informed. Where and when students will be using their services will need to be taken into account when it comes to staff.

2 Cont.

The State Environmental Policy Act covers a wide general range of policies. It is careful not to be too specific. The specifics are to be individualized by projects.

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A concern I have is the actual frequency of the plan. With Climate Change being so predominant in our society, the time span for SEPA, PEIS, and the final EIS, should be shortened. What happens, in a decade or two cannot be considered a norm. 5 years ago our neighborhood had elderly, 3 bedroom homes on single large lots. Today there is a younger generation, tiny lots, and homes that at most have 2 bedrooms. In the last year another 11 new homes have been added on the radius of a 1 mile walk. If the District is going to do anything at Ingraham, should the neighborhood be analyzed from a plan 20 years old? 10 years old? 5 years old? My answer is that each individual project, to protect the environment must be given a complete, thoroughly investigated Impact statement...not a general. Not a West Seattle School is just like a North Seattle School scheme...

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Each District has specific environmental needs. The impacts that the School District and City will have with each plan will be extensive. The School District must do more for ALL the residents of the City, not just the minimum. The SEPA's, used as the Districts answer for their "environmental awareness" are not enough. There is more to be considered. The projects themselves are individualized, to specific areas and environments. Each specific project, must be analyzed for the environmental changes in that small area. The SEPA, PEIS, EIS and their drafts are a general assessment. Each project is, an addition too, corrections for, and acknowledgment of new circumstances that occur since the last SEPA, PEIS and EIS. That is not what the District does, all the District project managers, architects and contractors do is write a document, of many pages, that refers back to the SEPA and previous PEIS, and EIS, not acknowledging the new circumstances in each project or eve the Directors District. I know that the PEIS and EIS have value, they are a starting point...not the ending point. The District, in good conscience, with an eye on climate change, and an eye on education, needs to realize that a document like the PEIS and final EIS are the beginning not an end to the future, and as the future changes so should those documents. The SEPA's are not enough, they do not carry the weight of the PEIS OR EIS. The SEPA's are a STATE Environmental Policy Act. The PEIS and EIS are a bit more specific...but, in truth they are a Suggested Environmental Plan that the District has no binding agreement to follow (waivers). Even worse, when the District does agree upon mitigations with the neighborhoods, they use those agreements as suggestions, not mitigation. I know, I have been on that merry-go-round more than once.

Let me describe that last ride. That last ride is burned deeply into my memory, and I walk by it every day, frequently feeling the anger and disappointments that the District has caused. It was one tree, yet it was a special tree, it towered above all the others, it was designated a significant tree by the City, and the mitigation was: Try to keep it, or at least turn it into a snag. What happened? The first thing I saw, as I opened my back door to view tree and new construction was the clearing of the grass for the project, and a BULLDOZER slamming into that tree, which was wrapped with the yellow caution tape, that days before had been carefully placed around the tree to protect the tree. The contractor didn't even have the courtesy to use a chain saw... he bulldozed it. Now, that was bad, and angered me.... But you know what was worse? In its place a red dumpster, to hold water in case of a fire, was sat. It never had water. In fact, the contractor connected a fire hydrant system to the school so he would not need the dumpster. That dumpster sat there during the entire project, empty... a red dumpster, no water, in place of a tree that was the tallest, beautiful piece of nature... where birds nested, rested and flew over during migration. A tree that can never be replaced was killed so a temporary dumpster could sit empty for a year and a half during construction. A tree that connected all the smaller, previous mitigated trees to an urban forest that the neighbors fought to save, was killed for a temporary dumpster. By the way, all those previously mitigated trees on the North Side of Ingraham were removed... also bulldozed under. The District wasted money, from previous bonds and levies, to buy and plant trees, grass, habitat, plants so a contractor on the next

6 Cont.

project could ignore the mitigation and bulldoze trees, grass, plants to easily build a new addition. The SEPA, (new and previous years) and its mitigation meant nothing to the architect, project manager and contractor. That tree meant something to me and the environment, and it could have been saved, if smaller equipment had been used, and someone cared about following a SEPA mitigation. That tree, is now a science project, that lies on its side, in the small grove. If truly that tree is a Science project, fine, at least it is used for more than fire wood. But if the tree roots and lean to on the roots are an excuse to say that homeless are in that small forest so the forest must be removed for Ingraham's next project... that is a neglectful, purposeful act of sabotage to make a 28acre campus have less than half an acre of trees, to put in yet another "addition". I have pointed out repeatedly other mitigated measures that have not been followed, (tree planting and watering) plus I have included those limbs that have fallen from the different trees in the small forest, and are leaned against the root structure of the huge BULLDOZED tree. There are other subtle ways the District is trying to prove the Urban Forest must be removed... I am watching, and I know what is happening. If a tree truly, is a hazard, the District can ask an arborist to check on it, and make it into a snag. The tree must be labeled by the city as hazardous, and a city arborist must check it out before anything happens to it. I know of one such tree, let me repeat that: **ONE tree**, that should be checked. All it needs is to be made into a snag, not removed. I fear that the District will take a tiny bit of acceptable maintenance, provided for in mitigation and make that into a reason to attack more trees... There is no reason to attack more trees, their value for the environment and biology classes is high. But the District cannot be trusted, so I don't point out where a small bit of maintenance is needed... Mitigations for SEPA, PEIS, and EIS are not followed...past experience is a great teacher.

That is my experience with the SEPA, PEIS, EIS,, their supplements and, mitigation process...just one experience... I have been on that ride more than once. Ingraham alone has violated mitigated environmental protections for the field, parking, forest, lights, signs, entries, and more. The District has lied, repeatedly, knowingly lied about projects, when they were planned and who had input. That is only Ingraham, I am sure there are other schools that had mitigations that were not followed... and that continual "innocent lie", sounds like "oh, the contractor didn't know, or Oh, it was a mistake, or an accident" ... such lies that are dependent on one thing: Once done they cannot be fixed, or returned to a previous state.

So here is my suggestion; hire architects that know how to read, understand, and **respect the environment and neighborhood**, instead of the easiest, quickest design, just, maybe, include retention of large trees, and habitat already in existence. Read the SEPA, PEIS and EIS...Understand their importance to the actual current environment, and respect the boundaries of the environment remembering that a building can be replaced in 20 years, but a 100 -year-old or older Douglas Fir will never be replaced, a100-year-old or older Madrona tree will never be replaced the pollutants from their removal will never be recaptured. Even the 5—100-year-old trees cannot be replaced... those years of past growth will not be "caught up" to. The professionals must understand the difference between Seattle and its environment, and trees vs another city, county, or other places in the State. They must also understand that mitigated trees and habitat, should be kept, there was money, time of the neighbors and promises made by the District to keep them... The District needs to respect mitigations, and why the neighbors worked so hard to have them.

Include in the SEPA, PEIS and the EIS process: All environmental changes to a neighborhood next to a school must be explained, publicly advertised through meetings IN THE NEIGHBORHOOD, US mail service, websites, the neighborhood blogs, and LOCAL NEWSPAPERS, like the SEATTLE TIMES and smaller neighborhood papers. Signs, as large as the "you paid for this project" signs, must be placed in public view (drive or walking by) that indicate a new project is intended and the District is seeking neighborhood comments and participation. The sign must include a list of meetings, where and when they will happen. The sign must have contacts, email comment address, and written comment address. The date ending the comment period must be included on the sign, within a reasonable readable distance from a car in the street. Any comments for a SEPA, PEIS, or EIS must be read, must be answered, and mitigations must be followed... not removed with the next project or two. The meetings should happen more than once (2 week days, and a weekend day) in **each District**. Those meetings may not have many attendees, but the few who do show up do represent a larger group in the neighborhood. The teacher, student, architect and other staff of the District represent the school district, but not the neighborhood. It would also be nice to SEE more than one mock up architectural plan, not just the one the District decided to use because it was the "professionals" recommendation. The neighborhood needs to have a true chance to be vested in the project beyond taxes, before the

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project is decided. That entire paragraph is necessary for inclusion for there to be true transparency concerning what the School District is up to.

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Every year there are new School Board Directors, or the return of previous Directors, which is fine. What is not fine is that the new Directors never really know what has been previously mitigated. previously done on a property or what the neighbors think, or even the lawsuits. They might know what the Project Manager, Architect and Contractor say, but is that the truth, or even the entire story? The School Board Directors are responsible to the public. Schools get tax money from the Public, lots of money, the public has the right to know where the money goes, the Directors represent the Public. The public would want answers to questions regarding protecting previous mitigations, what are previous mitigations, what will future mitigations be, what is the property used for in and off school hours. The SEPA, PEIS, EIS indicate how the short-term projects and the final projects fit into the neighborhood. But, they actually are a guess, not a specific, a general Are there artifacts from tribes in the area? How will that be checked? What is the importance to each of those artifacts? Will tribes be consulted before plans are made? Is there a migration route? How long will that be observed, (migrations occur year-round)? Who and what organizations will be included in that observation (local Audubon, bird watchers and area biologist or a "habitat specialist" who doesn't even know what a "critter" is). The SEPA, PEIS, EIS indicate how the shortterm projects and the final projects fit into the neighborhood. But, they actually are a guess, not a specific for each project, just a general repeated information from other observations on other projects around the District. The School Board Directors must ask the questions, get the information from the past, now, and future, **FOR EACH PROJECT**. Take time to "digest" it before any vote on a project. Ask real guestions, as if the project will be in YOUR BACK YARD, NONE of the "well, I didn't have enough time to get all the facts, so I will vote for trusting the Professionals". That attitude is akin to crossing the street without looking because the law says cars must stop for pedestrians, a disaster awaits those who do not look. A Director must spend a week or more, parked in the neighborhood where the project will happen. They must see, view, hear what that neighborhood is really like. Ideally upon winning an election, each Director should spend an unannounced week observing the neighborhood schools in their District. It might surprise them what is really happening.

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A State Environmental Policy Act is always able to have waivers. School Districts are allowed "weighted" preferences for their respective needs... or at least what they think they need. The State is working on their Comprehensive plans for the next 20 plus years, so is the City...perhaps the School District needs to see what those new, completed plans are, before jumping into the row boat to go through the hurricane of public opinion. Sinking at the first wave is poor planning.

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The PEIS and the EIS are to assist the environment, to keep, protect and grow the environment for the future of Seattle, its people and the students who inhabit inside the city limits. Allowing the destruction of the Environment in the name of "progress" is not an idea, it is a predetermined act of selfish, monetary gain.

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Not accounting for the changes in what housing is in Seattle (types of units: 1, 2, 3 bedroom---houses, apartments, condos---where they are) is ignoring the obvious of what the future population will look like. That population should dictate what type schools are needed, how big and what they should include. If the housing is primarily 1 or 2 bedrooms, how many families will be in that area? If the neighborhood is on the border of another School District like Shoreline or Kent or Renton will that make a difference of where a student might go to school? (remember rules aren't always followed as the District itself proves). How many families are Home Schooling or send students to Private Schools?

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Have educational needs changed? Are apprenticeships more important or at least equally as important as STEM? Or AP courses? Is it as important to be a mechanic, carpenter, plumber, electrician as it is to be a scientist, engineer, mathematician? Apprenticeships frequently will have off campus instructions. Are effective communication skills a need in society? Political activist? Music? Theater? History? Civics? Social Studies? Government and Economics? What type class rooms are mostly needed? For the last 3 remodel, renovation, additions at Ingraham the public was

| told they are for AP courses in the STEM program with emphasis on Math and Science. Science, and technology, music and theater may take specialized classrooms and space, but do classes like history, politics, civics, psychology, social studies, government, economics, and languages? Can classrooms be used by different teachers for different classes or must each teacher have their own room? And then there are Sports, did you know that Ingraham at one point in time, had a total of 27 sports? Is that more than STEM, AP and Math classes combined? How many sports are promoted across the District schools? | 16 Cont. |
|---|----------|
| Yes, the School District can play with the rules, and waivers of the State Environmental Policy Act. The real questions: Should it? Why? Is the real objectives "for the kids" or is it for the contractor, architect, politician, project managers or future monetary gain? Where is the money really going and why? Is the money going for Athletics? Teacher's lounges? Lunch rooms? Commons area? Empty space? High ceilings? Sunrooms? Classrooms? Books? Computers? Tablets? Internet for students? Is the money going for the mistakes, the improperly designed contracts that favor the contractor? | 17 |
| Are important issues like ADA compliance and safety needs being met? Or are those important issues, for a minor population of students, placed in the class of "oops, forgot to do that, will fix it next time"? How hard is it to include hearing and blind assistance devices on streets, sidewalks, entries, classrooms, restrooms? | 18 |
| How about clean water and healthy schools, who is responsible for those things in new projects? | 19 |
| Do projects, for appeal purposes need to be kept general? Is the District scared of the truth? Are the Hearing Examiners coached as to what to use as an excuse for not hearing an appeal? | 20 |
| Should projects, for the purpose of transparency, be specific for the area they will be occurring in? Even if being specific means there may be an appeal or two? Or even a change to the project. Which is more important safety, health, truth or the projects time table and already completed plan? Was public input ignored to achieve speed? | 21 |
| Are there cultural, historical impacts? What are they? BE SPECIFIC as to why or why not they are important. By itself, that should be important enough to be questioned through an appeal, is it? Even if the importance is for the Duwamish tribe, but is at Ingraham, it still is important, and should be appealable. | 22 |
| Are there impacts that will literally "float" across the City? Does removal of trees and habitat meet the Cities plans for 30% canopy coverage, if so, how? Does removing vegetation, including trees, release many years of captured pollutants, into the air, to float across the city? Chemical release is an air pollutant. Is it important to factor in what will happens when the chemicals from repeated Astro Turf replacement, or the asphalt and cement used in playgrounds are trucked throughout the City? What if all that trucking coincides with city and state projects, will that cause even higher, dangerous levels of pollution? Are there previously captured and sealed pollutants that will be released into the air when disturbed or removed? Will those pollutants become air borne? If a forest fire, burning in the Cascades causes air pollution warnings from the smoke in Seattle, how hard is it to realize that what is done at one School can spread in the air to the entire City? | 23 |
| Is traffic and parking a factor to be considered as a general or specific impact? I say both. Parents drive their kids to school and pick them up after school. Those parents come from different areas of the city and add to the overall traffic congestion and pollution in the entire city. The congestion in a neighborhood at beginning and ending times of school can be tremendous. They line up around the block, even side streets to pick up kids in my area. The city had to add a light to a major intersection to protect students and local residents. Does that impact local or entire City? Who paid for the light? Are there other factors, including, but not limited to increase in local speeding, parking, and general noise to be considered as an impact? | 24 |

The under the sheets truth will never be in a SEPA, PEIS, or EIS or their drafts and supplements, but it will always be in the conscience of the deciders.

Michele Leonard, 13502 Ashworth Avenue North, Seattle WA 98133

RESPONSE TO LETTER 4

Leonard. Michele

- 1. The comment regarding the City of Seattle's Comprehensive Plan is noted. SPS regularly tracks and analyzes the changes in housing and demographics in the City of Seattle (including Comprehensive Plan and zoning changes) as part of their typical planning processes for enrollment projections and capital planning. See Section 2.2 and Section 2.5 for further details on SPS's planning process and its relationship to the development of the BEX VI Capital Levy Program, and Section 3.5.1, Land Use, for discussion on the City of Seattle Comprehensive Plan.
- 2. As described in Chapter 2 of this FPEIS, public notification and participation opportunities were provided as part of the PEIS process and SPS's notification and public comment process meets the requirements of the State SEPA Rules (WAC 197-11) and SPS SEPA Policies (Board Policy 6890), including public notification and public comment period timeframes. Issuance of a Determination of Significance and initiation of the public scoping process for the PEIS was provided on January 16, 2024. The public scoping period was open for 30-days (until February 15, 2024) during which time, agencies, tribes and the public were invited to provide comments on the scope of the PEIS. Notice of the scoping period was posted on the SPS website and published in the Daily Journal of Commerce on four separate occasions from January 16, 2024 through January 25, 2024. Upon issuance of DPEIS, a public comment period was provided from April 8, 2024 through May 8, 2024 to solicit public comments on the DPEIS. A public comment meeting was also held on April 24, 2024 which included a virtual participation option to allow community members to participate remotely via computer.

Public engagement opportunities will continue to be provided for the community to provide comments and feedback on the proposed BEX VI Capital Levy Program and project lists as the program and project list continues to develop in 2024.

In addition, as noted in **Chapter 2**, SPS will conduct supplemental project-specific environmental review, as appropriate, when projects are ultimately selected for development under BEX VI. Supplemental environmental review could include SEPA Checklists, EISs, or an addendum to this programmatic EIS, depending on the type of project. During that supplemental environmental review, there would be additional public comment periods for the community to provide feedback on more specific details of individual projects.

3. The comment regarding the SEPA process is noted. As indicated in Chapter 2, the purpose of a Programmatic EIS is to evaluate potential impacts associated with a programmatic (non-project) action which is defined as an action that is broader than a single site-specific project, and involves decisions on policies, plans, or programs. Since details of potential specific projects under the BEX VI Capital Levy Program are not known at this time, SPS has prepared a programmatic level EIS in accordance with SEPA (WAC 197-11). SPS will conduct supplemental project-specific environmental review, as appropriate, when projects are ultimately selected for development under BEX VI. Supplemental environmental review could include SEPA Checklists, EISs, or an addendum to this programmatic EIS, depending on the type of project.

4. As noted in **Chapter 2**, the FPEIS evaluates potential impacts associated with a programmatic (non-project) action which is defined as an action that is broader than a single site-specific project, and involves decisions on policies, plans, or programs. Since details of potential specific projects under the BEX VI Capital Levy Program are not known at this time, SPS has prepared a programmatic level EIS in accordance with SEPA (WAC 197-11). A programmatic analysis of air quality with potential projects under the BEX VI Capital Levy Program is provided in **Section 3.1** of this FPEIS, including greenhouse gas emissions.

SPS will conduct supplemental project-specific environmental review, as appropriate, when projects are ultimately selected for development under the BEX VI Capital Levy Program. Supplemental environmental review could include SEPA Checklists, EISs, or an addendum to this programmatic EIS and can include a project-specific analysis of air quality and greenhouse gas conditions, depending on the type of project.

- 5. As described in **Chapter 2**, and consistent with previous BEX capital levies, this FPEIS provides a programmatic (non-project) environmental analysis of the BEX VI Capital Levy Program. As potential projects are ultimately selected in the future under the BEX VI Capital Levy Program, SPS would conduct supplemental project-specific environmental review, as appropriate. Supplemental environmental review would include a more specific review of environmental conditions and potential impacts for a potential project as specific details and design of those projects would be available.
- 6. The comments regarding previous SPS projects, the associated construction process, and effects on trees is noted. Section 3.2, Trees and Environmentally Critical Areas, provides a discussion of existing trees and environmentally critical areas (ECAs) for the potential BEX VI Capital Levy Program sites and evaluates the potential impacts that could occur as result of development under the BEX VI Program. Mitigation measures were identified to reduce potential impacts to trees and ECAs, including the following:
 - A tree survey and inventory report would be completed by a licensed arborist as part of the project-specific design for potential projects under the BEX VI Capital Levy Program. The report would identify and classify trees on a potential project site and identify trees to be retained and trees to be removed. All tree removal and replacement associated with project-specific construction would comply with the City of Seattle's Tree Ordinance (SMC 25.11.090).

Supplemental environmental review would be provided as appropriate and include a more specific review of environmental conditions and potential impacts, including trees, as specific details and design of those projects would be available. Mitigation measures would be identified as appropriate and necessary, based on the specific design details for each project, respectively.

7. The comment regarding mitigation measures for previous projects at Ingraham High School is noted. Mitigation measures are identified as part of the programmatic analysis for each of the environmental elements that are analyzed in this FPEIS. Additional mitigation measures could be identified as part of supplemental environmental review as potential projects are selected under the BEX VI Capital Levy Program.

- 8. The comment regarding project-specific design and retention of trees is noted. As appropriate, the project-specific design process for potential projects under the BEX VI Capital Levy Program would include the preparation of a tree survey and inventory report that would be completed by a licensed arborist as part of the project-specific design for potential projects under the BEX VI Capital Levy Program. The report would identify and classify trees on a potential project site and identify trees to be retained and trees to be removed. All tree removal and replacement associated with project-specific construction would comply with the City of Seattle's Tree Ordinance (SMC 25.11.090). See **Section 3.2**, Trees and Environmentally Critical Areas for further details on trees.
- 9. The comment regarding public notification and participation is noted. As indicated in Chapter 2, public notification and participation opportunities have been provided as part of this PEIS process and SPS's notification and public comment process meets the requirements of the State SEPA Rules (WAC 197-11) and SPS SEPA Policies (Board Policy 6890). Issuance of a Determination of Significance and initiation of the public scoping process for the PEIS was provided on January 16, 2024. The public scoping period was open for 30-days (until February 15, 2024) during which time, agencies, tribes and the public were invited to provide comments on the scope of the PEIS. Notice of the scoping period was posted on the SPS website and published in the *Daily Journal of Commerce* on four separate occasions from January 16, 2024 through January 25, 2024. Upon issuance of DPEIS, a public comment period was provided from April 8, 2024 through May 8, 2024 to solicit public comments on the DPEIS. A public comment meeting was also held on April 24, 2024 which included a virtual participation option to allow community members to participate remotely via computer.

Public engagement opportunities will continue to be provided for the community to provide comments and feedback on the proposed BEX VI Capital Levy Program and project lists as the program and project list continues to develop in 2024.

In addition, as noted in **Chapter 2**, SPS will conduct supplemental project-specific environmental review, as appropriate, when projects are ultimately selected for development under BEX VI in the future. During that supplemental environmental review, there would be additional public comment periods for the community to provide feedback on more specific details of individual projects.

- 10. The comment regarding School Board members is noted. The role of School Board members is outside of the scope of the SEPA analysis for the BEX VI Capital Levy Program.
- 11. As indicated in in **Chapter 2**, and consistent with previous BEX capital levies, this FPEIS provides a programmatic (non-project) environmental analysis of the BEX VI Capital Levy Program. As potential projects are ultimately selected in the future under the BEX VI Capital Levy Program, SPS would conduct supplemental project-specific environmental review, as appropriate. Supplemental environmental review would include a specific review of environmental conditions and potential impacts for a potential project based on the specific details and design for each project. Supplemental review could include SEPA Checklists, EISs, or an addendum to this programmatic EIS, depending on the type of project.

Table 3.8-3 provides a summary of the potential risk to encounter cultural resources at each of the potential BEX VI sites based on DAHP's archaeological predictive model. Mitigation measures are also identified in **Section 3.8**, Cultural Resources, for potential sites that are identified as having a very high or high potential to encounter cultural resources, including:

- For projects assessed as having a very high potential to adversely impact other
 cultural resources due to their unique natural or cultural setting, SPS would
 prepare a Monitoring and Inadvertent Discovery Plan (MIDP) and an
 archaeologist would actively monitor high risk construction ground disturbance.
 SPS would notify tribal representatives of the project schedule at least one week
 in advance of commencement of ground disturbance. Tribal representatives may
 also conduct site visits to observe construction ground disturbance.
- For projects assessed as having a moderate to high potential to adversely impact cultural resources, SPS would prepare an Inadvertent Discovery Plan (IDP) to establish protocols to be followed if archaeological sites are encountered during construction ground disturbance. Construction personnel would be briefed on the IDP and SPS would notify tribal representatives of the project schedule at least one week in advance of commencement of ground disturbance. Tribal representatives may also conduct site visits to observe construction ground disturbance.

Section 3.2, Trees and Environmentally Critical Areas, provides a discussion of existing critical areas that are on or adjacent to potential BEX VI sites, including Fish and Wildlife Conservation Areas and Riparian Corridors. **Table 3.2-1** summarizes environmentally critical areas (ECAs) that are on and adjacent to each potential site. Site specific analysis would be required at the time of project-specific design and environmental review to identify the existence and extent of any potential ECAs on a given site. Any development activities that could occur within ECAs or their buffers would comply with the requirements of the City of Seattle's Critical Areas Ordinance (SMC 25.09).

- 12. The comment regarding School Board members is noted. The role of School Board members is outside of the scope of the SEPA analysis for the BEX VI Capital Levy Program.
 - As noted in the response to Comment 3, the purpose of a Programmatic EIS is to evaluate potential impacts associated with a programmatic (non-project) action which is defined as an action that is broader than a single site-specific project, and involves decisions on policies, plans, or programs. SPS will conduct supplemental project-specific environmental review, as appropriate, when projects are ultimately selected for development under BEX VI.
- 13. The comment regarding State and City comprehensive planning is noted. As discussed in the response to Comment 1 of this letter, SPS regularly reviews and analyzes the changes in housing and population in the City of Seattle (including Comprehensive Plans) as part of their typical planning processes for enrollment projections and capital planning. See **Section 2.2** and **Section 2.5** for further details on SPS's planning process and its relationship to the development of the BEX VI Capital Levy Program

- 14. The comment regarding the intent of SEPA is noted.
- 15. The comment regarding population and demographic changes in the City of Seattle is noted. SPS regularly tracks and analyzes the changes in housing and zoning in the City of Seattle as part of their typical planning processes for enrollment projections and capital planning. See **Section 2.2** and **Section 2.5** for further details on SPS's planning process and its relationship to the development of the BEX VI Capital Levy Program, and **Section 3.5.1**, Land Use, for discussion on the City of Seattle Comprehensive Plan.
- 16. The comment regarding educational needs is noted but is outside of the scope of the SEPA analysis for the BEX VI Capital Levy Program. **Section 2.2**, BEX VI Purpose and Objectives, and **Section 2.5**, Proposed Action, provide details on SPS's planning process and its relationship to the development of the BEX VI Capital Levy Program.
- 17. SPS's SEPA policies (Board Policy No. 6890) and procedures are consistent with the Washington State SEPA Rules as established by WAC 197-11 (see Section 2.3, Environmental Review and Purpose and Section 2.4, EIS Scoping, for further discussion on SPS SEPA procedures as it relates to the BEX VI Capital Levy Program).

The BEX VI Capital Levy Program identifies potential projects that are anticipated to occur under the BEX VI Capital Levy Program and this FPEIS provides a programmatic analysis of the potential environmental impacts that could occur with implementation of BEX VI. **Section 2.2**, BEX VI Purpose and Objectives, and **Section 2.5**, Proposed Action, provide details on SPS's planning process and its relationship to the development of the BEX VI Capital Levy Program.

Financial details and expenditures for SPS operations are outside of the scope of the analysis of this FPEIS. Further details on the BEX VI Capital Levy Program and planning process are available at: https://www.seattleschools.org/about/levy/bex-vi-capital-levy-planning/

- 18. ADA compliance and safety needs are evaluated through the scoring and ranking of potential projects. Building modifications, building additions and new buildings are designed to be compliant with the current ADA code and requirements. Design details for ADA compliance and safety would be reviewed as part of the project-specific design and planning process for specific potential projects under the BEX VI Capital Levy Program.
- 19. The specific provision of water service for individual school facilities and other health and safety measures would be reviewed as part of the project-specific planning and design process for specific potential projects that are selected under the BEX VI Capital Levy Program.
- 20. As noted in Chapter 2, in **Chapter 2**, the purpose of a Programmatic EIS (PEIS) is to analyze potential impacts associated with a programmatic (non-project) action which is defined as an action that is broader than a single site-specific project, and involves decisions on policies, plans, or programs. Since details of potential specific projects under the BEX VI Capital Levy Program are not known at this time, SPS has prepared a programmatic level EIS in accordance with SEPA (WAC 197-11).

- 21. As described in **Chapter 2**, project-specific planning and design would occur for individual projects as they are selected for development under the BEX VI Capital Levy Program. SPS will conduct supplemental project-specific environmental review, as appropriate, when projects are ultimately selected for development under BEX VI. Supplemental environmental review could include SEPA Checklists, EISs, or an addendum to this programmatic EIS, depending on the type of project.
 - Public input opportunities were provided through several stages of the PEIS process. A public scoping period was open for 30-days (January 16 through February 15, 2024) during which time, agencies, tribes and the public were invited to provide comments on the scope of the PEIS. Subsequent to the issuance of the DPEIS, a public comment period was provided from April 8, 2024 through May 8, 2024 to solicit public comments on the DPEIS. A public comment meeting was also held on April 24, 2024, which included a virtual participation option to allow community members to participate remotely via computer. Public comment opportunities could also be provided as part of the project-specific supplemental environmental review process.
- 22. An analysis of cultural resource regulations, existing conditions, and potential impacts is provided as part of **Section 3.8**, Cultural Resources. Potential impacts from projects under the BEX VI Capital Levy Program are identified in **Section 3.8** and **Table 3.8-3** provides a summary of the potential risk to encounter cultural resources at each of the potential BEX VI sites based on DAHP's archaeological predictive model. Mitigation measures are also identified in **Section 3.8**, Cultural Resources, for potential sites that are identified as having a very high or high potential to encounter cultural resources, including:
 - For projects assessed as having a very high potential to adversely impact other
 cultural resources due to their unique natural or cultural setting, SPS would
 prepare a Monitoring and Inadvertent Discovery Plan (MIDP) and an
 archaeologist would actively monitor high risk construction ground disturbance.
 SPS would notify tribal representatives of the project schedule at least one week
 in advance of commencement of ground disturbance. Tribal representatives may
 also conduct site visits to observe construction ground disturbance.
 - For projects assessed as having a moderate to high potential to adversely impact cultural resources, SPS would prepare an Inadvertent Discovery Plan (IDP) to establish protocols to be followed if archaeological sites are encountered during construction ground disturbance. Construction personnel would be briefed on the IDP and SPS would notify tribal representatives of the project schedule at least one week in advance of commencement of ground disturbance. Tribal representatives may also conduct site visits to observe construction ground disturbance.

An analysis of historic resource regulations, conditions and potential impacts is provided in **Section 3.9**, Historic Resources. **Table 3.9-1** summarizes the historic listing status for each of the potential sites under the BEX VI Capital Levy Program. Mitigation measures to minimize potential impacts to historic resources are identified in **Section 3.9.4**, including:

- Potential projects involving designated Seattle Landmarks will require review and approval by the Landmarks Preservation Board and issuance of a Certificate of Approval by the DON.
- Any building over 45 years of age that has not previously been evaluated for eligibility as a Seattle Landmark, will require a historical analysis by the DON Historic Preservation staff and/or referral to the Landmarks process as part of the MUP process. If the property is subsequently designated a Seattle Landmark, potential changes will require a Certificate of Approval.
- When planning potential projects involving designated or eligible historic resources, SPS and its selected design team should consider character-defining features from the outset of the project and craft a sensitive approach to avoid or minimize potential adverse impacts.
- 23. A discussion of cumulative impacts is provided for each of the environmental elements that are analyzed in the FPEIS, including **Section 3.1**, Air Quality; **Section 3.2**, Trees and Environmentally Critical Areas; **Section 3.10**, Transportation; and, **Section 3.11**, Environmental Health.
 - Project-specific planning and design would occur for individual projects as they are selected for development under the BEX VI Capital Levy Program. SPS will also conduct supplemental environmental review, as appropriate, when projects are ultimately selected for development under BEX VI, which would include specific analysis of potential environmental impacts that could occur relative to each individual project's design and site conditions.
- 24. As stated in the FPEIS (Section 3.10.2), the analysis is presented at a planning level of detail consistent with a programmatic analysis of potential effects. SPS will conduct appropriate project-level transportation analysis for each project when sufficient proposal details are available. The FPEIS identified and disclosed the potential ranges of traffic generation increases at and near the identified schools based on the ranges of enrollment capacity increases that could be proposed (see Table 3.10-5). Based on the ranges of possible capacity increases envisioned and the average rates described, the highest trip generation associated with a school replacement project on an existing site is estimated at an increase of up to 270 morning peak hour trips and up to 230 afternoon peak hour trips. Schools that are proposed to accommodate increased student capacity may also experience increased attendance and traffic generation by some of the occasional events that already occur at those sites.

For projects that would result in increases in student enrollment capacity, project-level review of site access and local area transportation impacts would be performed and based on rates derived specifically for those schools, rates derived for similar schools, or the published ITE rates presented previously.

As also stated in the FPEIS, for school replacement projects that would result in increases in student enrollment capacity, project-level review of site access and local area traffic operations would be conducted. Changes to on-site parking, nearby on-street parking, or site access conditions can also influence traffic circulation, operations of site

driveways and nearby intersections, and would also be included in project-level analysis when specific projects are selected.

The installation of traffic signals is administered by jurisdictions that control the roadways and transportation rights-of-way. In the City of Seattle, the Seattle Department of Transportation (SDOT) oversees right-of-way and traffic control devices, including traffic signals. Typically, the City requires that, for installation of new traffic signals, an intersection meet one or more warrants outlined in the Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways. The various MUTCD warrants can be satisfied based on eight-hour, four-hour, and/or peak hour vehicle volumes, pedestrian volumes, school crossing locations, coordinated signal systems, crash experience, roadway network needs, or at-grade railroad crossing conditions. The sources for funding roadway and intersection improvements, including traffic signalization, can be the controlling jurisdiction (such as the City of Seattle) or an individual private- or public-sector project developer (such as SPS), if the improvement is identified as an appropriate specific mitigation measure to address project-related impacts.

Project-level transportation analysis may include review of vehicle speed conditions in some instances; review of possible noise impacts is also conducted at the project level for some types of developments. The State of Washington adopted SEPA-related amendments on January 20, 2023 which removed parking as an element of the environment in WAC 197-11-444(2)(c)(iv). Pursuant to these amendments, the City of Seattle no longer identifies or requires analysis of parking impacts for SEPA review. However, the City has requested detailed parking studies for SPS projects that apply for code departures (such as for reduced on-site parking supply).

CHAPTER 5

References

CHAPTER 5

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APPENDIX A

Distribution List

| NAME | TITLE | DEPARTMENT |
|-------------------------------------|---|---|
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| Rob Saka | Councilmember, City of Seattle | |
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| Maritza Rivera | Councilmember, City of Seattle | |
| Cathy Moore | Councilmember, City of Seattle | |
| Dan Strauss | Councilmember, City of Seattle | |
| Robert Kettle | Councilmember, City of Seattle | |
| Tanya Woo | Councilmember, City of Seattle | |
| Sara Nelson | Councilmember, City of Seattle | |
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| Nathan Torgelson Harold Scoggins | Chief | Seattle Fire Dept. City of Seattle |
| | | |
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| Marcellus Turner | Director | Seattle Public Library, City of Seattle |
| Kathy Nyland | Director | Dept. of Neighborhoods, City of Seattle |
| Holly Miller | Director | Dept. of Neighborhoods, Office for Education, City of Seattle |
| Maureen Sheehan | Senior Planning | Dept. of Neighborhoods, Major Institutions/Schools, City of Seattle |
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| Chris Gregorich | Director | Intergovernmental Relations Office, City of Seattle |
| Carmen Best | Interim Chief of Police | City of Seattle |
| Holly Godard | Land Use Reviewer | Dept of Planning & Development, City of Seattle |
| Strategic Advisor | Strategic Advisor | Seattle Parks and Recreation |
| 5t. atc ₀ .c / ta / 15c. | Property & Acquisition Services Manager | Seattle Parks and Recreation |
| | Senior Planner | Seattle Parks and Recreation |
| | Coordinator of | Central Neighborhood Service Center |
| | Coordinator of | Southeast Neighborhood Service Center |
| | | |
| | Coordinator of | Delridge Neighborhood Service Center |
| | Coordinator of | Ballard Neighborhood Service Center |
| | Coordinator of | Queen Anne Neighborhood Service Center |
| | Coordinator of | Greater Duwamish Neighborhood Service Center |
| | Coordinator of | University Neighborhood Service Center |
| | Coordinator of | Lake City Neighborhood Service Center |
| | Coordinator of | Fremont Neighborhood Service Center |
| | Coordinator of | Capitol Hill Neighborhood Service Center |
| | Coordinator of | Downtown Neighborhood Service Center |
| | Manager of | Ballard Library |
| | Manager of | Beacon Hill Library |
| | Manager of | Broadview Library |
| | Manager of | Capitol Hill Library |
| | Manager of | Central Library |
| | Manager of | Columbia Library |
| | Manager of | Delridge Library |
| | Manager of Manager of | Douglass Truth Library |
| | Manager of | Fremont Library |
| | Manager of | Green Lake Library |
| | | · |
| | Manager of | Greenwood Library |
| | Manager of | High Point Library |
| | Manager of | International District/Chinatown Library |
| | Manager of | New Holly Library |
| | Manager of | Lake City Library |
| | Manager of | Madrona Sally Goldmark Library |
| | Manager of | Magnolia Library |
| | Manager of | Montlake Library |
| | Manager of | North East Library |
| | Manager of | Northgate Library |
| | - | • |

| | M | Defection December Observer |
|--------------------|--------------------------------------|---|
| | Manager of Manager of | Rainier Beach Library South Park Library |
| | Manager of | South Park Library Southwest Library |
| | Manager of | University Library |
| | Manager of | Wallingford Wilmot Library |
| | Manager of | West Seattle Library |
| | Coordinator of | Ballard - Community Recreation Center |
| | Coordinator of | Belltown - Community Recreation Center |
| | Coordinator of | Langston Hughes - Community Recreation Center |
| | Coordinator of | Laurelhurst - Community Recreation Center |
| | Coordinator of | Loyal Hghts - Community Recreation Center |
| | Coordinator of | Magnolia - Community Recreation Center |
| | Coordinator of | Magnuson - Community Recreation Center |
| | Coordinator of | Meadowbrook - Community Recreation Center |
| | Coordinator of | Miller - Community Recreation Center |
| | Coordinator of | Mountlake - Community Recreation Center |
| | Coordinator of | Northgate - Community Recreation Center |
| | Coordinator of | Queen Anne - Community Recreation Center |
| | Coordinator of | Van Asselt - Community Recreation Center |
| | Coordinator of | Yesler - Community Recreation Center |
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| | Coordinator of | Jefferson - Community Recreation Center |
| | Coordinator of | Rainier - Community Recreation Center |
| | Coordinator of | Alki - Community Recreation Center |
| | Coordinator of | Garfield - Community Recreation Center |
| | Coordinator of | Greenlake - Community Recreation Center |
| | Coordinator of | Delridge - Community Recreation Center |
| | Coordinator of | Hiawatha - Community Recreation Center |
| | Coordinator of | High Point - Community Recreation Center |
| | Coordinator of | Int'l District/Chinatown - Community Recreation Center |
| | Coordinator of | South Park - Community Recreation Center |
| | Coordinator of | Southwest Complex - Community Recreation Center |
| | Coordinator of | Bitterlake - Community Recreation Center |
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| | Executive Secretary | M.L. King County Labor Council |
| | Executive Director | Seattle Housing Authority |
| | President | NAACP |
| | Publisher | Seattle Chinese Post |
| | Publisher | Seattle Daily Journal of Commerce |
| | Editor In Chief | The Seattle Times |
| | Editor In Chief | The Daily |
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| | Executive Director | Puget Sound Air Pollution Control Agency |
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| Joe Nguyen | 34th District | |
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| Conrad Plyler | | |
| Shaun Hubbard | | |
| Michele Leonard | | |
| | | |

APPENDIX B

Transportation Appendix Tables

Table 3.10-1. Primary Roadways Serving Potential BEX VI Project Sites

| | Adjacen | t Street(s) | Other Nearby Major Street(s) ² | |
|-------------------------------------|--|--|--|--|
| Potential Project Site 1 | Street Name | Classifications | Street Name | Classifications |
| Elementary Schools | | | | |
| Arbor Heights Elementary School | SW 104th Street SW 105th Street | Local Access Local Access | SW 106 th Street 35 th Avenue SW | Collector Arterial Minor Transit Route Minor Arterial Minor Transit Route |
| Bailey Gatzert Elementary School | E Yesler Way 12 th Avenue S 14 th Avenue S | Minor Arterial Minor Transit Route Minor Arterial, Minor Freight Network (north of Boren) Principal Arterial (south of Boren) Minor Transit Network Collector Arterial Minor Transit Route | Boren Avenue S S Jackson Street | Principal Arterial Minor Transit Route Major Freight Network Minor Arterial Principal Arterial, Minor Transit Route (west of 14th Ave S) |
| Bryant Elementary School | NE 60 th Street NE 57 th Street 33 rd Avenue NE 34 th Avenue NE | Local Access Local Access Local Access Local Access | NE 65 th Street NE 55 th Street 25 th Avenue NE 35 th Avenue NE | Minor Arterial Major Transit Route Collector Arterial Major Transit Principal Arterial Major Transit Route Minor Freight Network Minor Arterial Major Transit Route |
| Concord Elementary School | S Concord Street S Henderson Street 7th Avenue S 8th Avenue S | Local Access Local Access Local Access Collector Arterial | S Cloverdale Street S Trenton Street State Route (SR) 99 SR 509 | Principal Arterial Minor Transit Route Major Freight Network Collector Arterial State Route Major Transit Route Limited Access Freight Network Principal Arterial Principal Transit Route Limited Access Freight Network |
| Dearborn Park Elementary School | S Orcas Street | Collector Arterial | Beacon Avenue S MLK Jr Way S | Minor Arterial Minor Transit Route Principal Arterial Major Transit Route Major Freight Network |



Table 3.10-1. Primary Roadways Serving Potential BEX VI Project Sites

| | Adjacent Street(s) | | Other Nearby N | Major Street(s) ² |
|------------------------------------|--|---|---|--|
| Potential Project Site 1 | Street Name | Classifications | Street Name | Classifications |
| Gatewood Elementary School | SW Frontenac Street SW Myrtle Street Fauntleroy Way S | Local Access Local Access Minor Arterial Major Transit Route Major Freight Network | California Avenue SW | Collector Arterial Minor Transit Route |
| Genessee Hill Elementary School | SW Dakota Street SW Genesee Street 51st Avenue SW | Local Access Collector Arterial Minor Transit Route Local Access | SW Charlestown St 55 th Avenue SW California Avenue SW | Collector Arterial Minor Transit Route Collector Arterial Minor Transit Routes Minor Arterial Major Transit Route Minor Freight Network |
| Leschi Elementary School | E Spruce Street E Yesler Way 31st Avenue 32nd Avenue | Local Access Collector Arterial Minor Transit Route Local Access Collector Arterial | MLK Jr Way Lake Dell Avenue | Minor Arterial Minor Transit Route Minor Freight Network Collector Arterial Minor Transit Route |
| Lowell Elementary School | E Roy Street E Mercer Street Federal Avenue E 11 th Avenue E | Alley Local Access Local Access Local Access | E Aloha Street 10 th Avenue E/ Broadway E 12 th Avenue E | Minor Arterial Minor Arterial Major Transit Route Minor Arterial Minor Freight Network |
| Roxhill Elementary School | SW Barton Place SW Roxbury Street 30th Avenue SW | Minor Arterial Major Transit Route Principal Arterial Local Access | 35 th Avenue SW 26 th Avenue SW | Principal Arterial, Major Transit Route (north of Roxbury) Minor Arterial, Minor Transit Route (south of Roxbury) Collector Arterial Minor Transit Route |
| Sacajawea Elementary School | 20th Avenue NE NE 96th Street | Local Access Local Access | 15 th Avenue NE Lake City Way NE | Minor Arterial Major Transit Route Principal Arterial Major Transit Route Major Freight |
| Stevens Elementary School | E Galer Street 18th Avenue E 19th Avenue E | Collector Arterial Local Access Local Access Minor Transit Route | 15 th Avenue E 24 th Avenue E | Minor Arterial Minor Transit Route Principal Arterial Major Transit Route Minor Freight Network |



Table 3.10-1. Primary Roadways Serving Potential BEX VI Project Sites

| Street Name NE 85 th Street 29 th Avenue NE | Classifications Local Access | Street Name | Classifications | | |
|--|--|---|--|--|--|
| 29th Avenue NE | Local Access | | | | |
| NE 86 th Street 30 th Avenue NE | Local Access Local Access Local Access | Ravenna Ave NE | Principal Arterial Minor Transit Route Minor Freight Network Minor Arterial | | |
| | | 35" Avenue NE | Major Transit Route | | |
| SW Juneau Street Croft Place SW Delridge Way SW | Local Access Local Access Principal Arterial Minor Transit Route Minor Freight Network | 16 th Avenue NW | Minor Arterial Minor Transit Route | | |
| W Florentia Street W Raye Street 3 rd Avenue W 1 st Avenue W | Collector Arterial Local Access Minor Arterial Minor Transit Route Local Access | Nickerson Street W McGraw Street | Principal Arterial Major Transit Route Major Freight Network Collector Arterial, Minor Transit Route (west of 3rd Ave W) Minor Arterial, Major Transit Route (east of 3rd Ave W) | | |
| NW 67 th Street NW 65 th Street 19 th Avenue NW 18 th Avenue NW | Local Access Minor Arterial Local Access Local Access | 24 th Avenue NW 15 th Avenue NW | Minor Arterial Minor Transit Route Minor Freight Network Principal Arterial Minor Transit Route Major Freight Network | | |
| Middle Schools | | | | | |
| S Graham Street 39 th Avenue S 42 nd Avenue S | Minor Arterial Local Access Local Access | S Orcas Street MLK Jr Way S Rainier Avenue S | Minor Arterial Principal Arterial Major Transit Route Major Freight Network Principal Arterial Major Transit Route | | |
| | Croft Place SW Delridge Way SW W Florentia Street W Raye Street 3rd Avenue W 1st Avenue W NW 67th Street NW 65th Street 19th Avenue NW 18th Avenue NW | Croft Place SW Delridge Way SW Local Access Principal Arterial Minor Transit Route Minor Freight Network W Florentia Street W Raye Street 3rd Avenue W Ninor Arterial Minor Transit Route Local Access Minor Arterial Minor Transit Route Local Access NW 67th Street NW 65th Street 19th Avenue NW Local Access Local Access Local Access Minor Arterial Local Access Local Access Local Access Local Access Local Access | Croft Place SW Delridge Way SW Delridge Way SW Principal Arterial Minor Transit Route Minor Freight Network Collector Arterial Local Access Minor Arterial Minor Transit Route Local Access Minor Arterial Minor Transit Route Local Access W McGraw Street W McGraw Street NW 65th Street 19th Avenue NW 18th Avenue NW 18th Avenue NW S Graham Street 39th Avenue S 42nd Avenue S 42nd Avenue S Local Access Local Access Local Access Local Access Local Access Minor Arterial Local Access Local Access Local Access Local Access Minor Arterial Local Access MLK Jr Way S | | |



Table 3.10-1. Primary Roadways Serving Potential BEX VI Project Sites

| | Adjacen | t Street(s) | Other Nearby I | Major Street(s) ² |
|-------------------------------------|--|--|--|--|
| Potential Project Site 1 | Street Name | Classifications | Street Name | Classifications |
| Eckstein Middle School | NE 75 th Street NE 70 th Street 30 th Avenue NE 33 rd Avenue NE | Minor Arterial Minor Transit Route Local Access Local Access Local Access | NE 65 th Street 25 th Avenue NE 35 th Avenue NE | Minor Arterial Major Transit Route Principal Arterial Minor Transit Route Minor Freight Network Minor Arterial Major Transit Route |
| Jane Addams Middle School | NE 110 th Street 31 st Avenue NE 34 th Avenue NE NE 115 th Street | Collector Arterial Local Access Local Access Local Access | 35 th Avenue NE 30 th Avenue NE | Minor Arterial Minor Transit Route Collector Arterial |
| Madison Middle School | SW Hinds Street SW Spokane Street 47 th Avenue SW 45 th Avenue SW | Local Access Local Access Local Access Local Access | SW Charlestown Street 49 th Avenue SW California Avenue SW | Collector Arterial Collector Arterial Minor Transit Route Minor Arterial Major Transit Route Minor Freight Network |
| Robert Eagle Staff Middle School | N 92 nd Street (east of Wallingford) N 90 th Street Stone Avenue N | Minor Arterial Minor Transit Route (west of College) Major Transit Route (east of College) Collector Arterial Local Access | N 85th Street Aurora Avenue N Wallingford Avenue N College Way N | Principal Arterial Major Transit Route Principal Arterial Major Transit Route Major Freight Network Minor Arterial Minor Transit Route Minor Arterial Minor Arterial Major Transit Route |
| Van Asselt Interim School | Beacon Avenue S S Myrtle Street | Collector Arterial (south of Myrtle) Minor Arterial (north of Myrtle) Minor Transit Route Principal Arterial Minor Transit Route Minor Freight Network | Swift Avenue S S Webster Street | Principal Arterial Minor Transit Route Minor Freight Network Collector Arterial |



Table 3.10-1. Primary Roadways Serving Potential BEX VI Project Sites

| | Adjacen | t Street(s) | Other Nearby I | Major Street(s) ² |
|--------------------------|---|--|--|--|
| Potential Project Site 1 | Street Name | Classifications | Street Name | Classifications |
| Whitman Middle School | NW 95 th Street NW 92 nd Street NW 90 th Street 15 th Avenue NW | Local Access Local Access Local Access Collector Arterial Minor Transit Route | NW 96th Street NW 85th Street 24th Avenue NW Holman Road NW | Collector Arterial Minor Arterial Minor Transit Route Minor Freight Network Collector Arterial Minor Transit Route Principal Arterial Minor Transit Route Major Truck Network |
| High Schools | | | | |
| Ballard High School | 15 th Avenue NW NW 65 th Street NW 67 th Street | Principal Arterial Minor Transit Route Major Truck Network Minor Arterial Local Access | 14 th Avenue NW | Collector Arterial |
| Chief Sealth High School | SW Kenyon Street SW Thistle Street 27 th Avenue SW SW Elmgrove Street 26 th Avenue SW | Local Access Minor Arterial Local Access Local Access Local Access | SW Holden Street 35th Avenue SW Delridge Way SW | Collector Arterial Minor Transit Route Principal Arterial Major Transit Route Principal Arterial Minor Transit Route Minor Transit Route Minor Freight Network |
| Franklin High School | S Mount Baker Boulevard S Hanford Street 30 th Avenue S 32 nd Avenue S | Collector Arterial Local Access Local Access Local Access | S McClellan Street MLK Jr Way S Rainier Avenue S | Minor Arterial Minor Arterial, Major Transit Route (north of Rainier) Principal Arterial, Major Transit Route, Major Freight Network (south of Rainier) Principal Arterial Principal Transit Route, Major Freight Network (north of MLK) Major Transit Route, Minor Freight Network (south of MLK) |



Table 3.10-1. Primary Roadways Serving Potential BEX VI Project Sites

| | Adjacent | Street(s) | Other Nearby N | lajor Street(s) ² |
|--|--|--|---|--|
| Potential Project Site 1 | Street Name | Classifications | Street Name | Classifications |
| Ingraham High School | N 135th Street N 130th Street Ashworth Avenue N N 133rd Street N 131st Street | Local Access Principal Arterial Minor Transit Route Minor Freight Network Local Access Local Access Local Access | Meridian Avenue N Aurora Avenue N | Collector Arterial Minor Transit Route Principal Arterial Major Transit Route Major Freight Network |
| Interagency High School – Columbia Site | S Edmunds Street S Ferdinand Street 35 th Avenue S 37 th Avenue S | Local Access Local Access Local Access Local Access | S Alaska Street MLK Jr Way S Rainier Avenue S | Minor Arterial Major Transit Route Minor Freight Network Principal Arterial Major Transit Route Major Freight Network Principal Arterial Major Transit Route Minor Freight Network Network |
| John Marshall Interim School | NE 68th Street NE 65th Street NE Ravenna Boulevard Weedin Place NE 8th Avenue NE | Local Access Minor Arterial Minor Arterial (north of 65 th) Principal Arterial (south of 65 th) Minor Arterial Minor Arterial (north of 65 th) Principal Arterial (south of 65 th) | Roosevelt Way NE | Principal Arterial Minor Transit Route (north of 65 th) Major Transit Route (south of 65 th) Minor Freight Network |
| Nathan Hale High School | NE 110 th Street 35 th Avenue NE 30 th Avenue NE | Collector Arterial Minor Arterial Minor Transit Route Collector Arterial | | |



Table 3.10-1. Primary Roadways Serving Potential BEX VI Project Sites

| | Adjacent Street(s) | | Other Nearby N | //ajor Street(s) ² | | |
|---|--|---|--|--|--|--|
| Potential Project Site 1 | Street Name | Classifications | Street Name | Classifications | | |
| Roosevelt High School | NE 68 th Street NE 66 th Street 12 th Avenue NE | Local Access Local Access Principal Arterial Minor Transit Route Minor Freight Network Minor Arterial Major Transit Route | NE 65 th Street Roosevelt Way NE | Minor Arterial Principal Arterial Minor Transit Route Minor Freight Network | | |
| Seattle World School at T.T. Minor | E Pike Street E Union Street 18th Avenue | Local Access Minor Arterial, Minor Transit Route (west of Madison) Minor Arterial Minor Freight Network Major Transit Route Local Access | E Madison Street 14 th Avenue 19 th Avenue | Principal Arterial Major Transit Route Collector Arterial Collector Arterial | | |
| West Seattle High School | SW Hanford Street California Avenue SW Walnut Avenue SW | Collector Arterial Minor Transit Route Collector Arterial Minor Transit Route (north of Admiral) Minor Arterial Major Transit Route Minor Freight Network (south of Admiral) Local Access | SW Admiral Way | Principal Arterial Major Transit Route (west of California) Minor Transit Route Minor Freight Network (east of California) | | |
| Other Sites | | | | | | |
| Southwest Athletic Complex and Old Denny Middle School Site | SW Thistle Street SW Trenton Street 30 th Avenue SW 29 th Avenue SW 26 th Avenue SW | Minor Arterial Minor Transit Route Collector Arterial Local Access Local Access Local Access | 35 th Avenue SW Delridge Way SW | Principal Arterial Major Transit Route Principal Arterial Minor Transit Route Minor Freight Network | | |

Source: Seattle Department of Transportation (SDOT) Street Classification Map, 2023.



^{1.} Adjacent roadway(s) that provide either vehicle access or primary pedestrian access to the school site.

^{2.} Nearest roadway(s) with principal arterial, minor arterial, or collector arterial functional classification that are not directly adjacent to the school site.

Table 3.10-3. Public Transit Service within One-Quarter Mile of Potential BEX VI Project Sites

| Potential Project Site | Transit Route | Destinations Served Frequent Transit Network (FTN) Designation | Typical Weekday Frequency (minutes) |
|-------------------------------------|--|--|-------------------------------------|
| Elementary School | Trouto | Troquote runot rottrom (* 117) 2001gration | Troquency (minutes) |
| Arbor Heights Elementary School | tary Local 21 Arbor Heights, Roxhill, Westwood Village, High Point, West Seattle, Downtown Seattle | | 10-20 |
| | 22 | Arbor Heights, Westwood Village, Gatewood, Alaska Junction | 55-70 |
| Bailey Gatzert Elementary School | Local | Kinnear, Seattle Center, Downtown Seattle | 12-30 |
| | 7 | Prentice St, Rainier Beach, Columbia City, Downtown Seattle | 7-15 |
| | 14 | Mount Baker, Downtown Seattle | 15-30 |
| | 27 | Colman Park, Leschi Park, Downtown Seattle | 25-30 |
| | 36 | Othello Station, Beacon Hill, Jefferson Park, Chinatown/International District, Downtown Seattle | 10-15 |
| | 49 | University District, Broadway, Downtown Seattle | 15-30 |
| | 106 | Renton, Skyway, Rainier Beach, Chinatown/International District | 10-30 |
| | Commuter 9 | Rainier Beach, Columbia City, Seattle University, Broadway | 15-30 |
| | 43 | University District, Montlake, Capitol Hill, First Hill, Downtown Seattle | 10-30 |
| | 984 | Serves Lakeside School, Roosevelt, University District, Montlake, Capitol Hill, Madison Valley, Downtown Seattle | One PM departure |
| | DART 630 | South Mercer Island, First Hill, Downtown Seattle | Two departures each direction |
| | First Hill Streetcar | Capitol Hill, First Hill, Yesler Terrace, Central Area, Chinatown-International District, Pioneer Square | 12-15 |
| | | 12th Avenue S, 14th Avenue S, E Yesler Way, S Jackson Street, and Rainier Avenue S are included in the Frequent Transit Network (FTN) in the Transit Master Plan. | |



Table 3.10-3. Public Transit Service within One-Quarter Mile of Potential BEX VI Project Sites

| | | | - |
|------------------------------------|---------------------|---|--|
| Potential Project Site | Transit Route | Destinations Served Frequent Transit Network (FTN) Designation | Typical Weekday Frequency (minutes) |
| Bryant Elementary School | Local 62 | Sand Point, Ravenna, Roosevelt, Green Lake, Wallingford, Fremont, Downtown Seattle | 8-30 |
| | 65 | Jackson Park, Lake City, Wedgwood, Children's Hospital, University District | 15 |
| | 79 | Green Lake P&R, Roosevelt, Wedgwood, Hawthorne Hills, University District | 20-60 |
| | | NE 65 th Street and 35 th Avenue NE are included in the FTN in the Transit Master Plan. | |
| Concord Elementary School | Local 60 | Westwood Village, White Center, Olson/Meyers P&R, Georgetown, Beacon Hill, First Hill, Broadway | 10-20 |
| | | The Transit Master Plan recommends S Coverdale Street for upgrade to the FTN. | |
| Dearborn Park Elementary School | Local 36 | Othello Station, Beacon Hill, Jefferson Park, Chinatown/International District, Downtown Seattle | 10-15 |
| | 106 | Renton, Skyway, Rainier Beach, Chinatown/International District | 10-30 |
| | | Beacon Avenue S and MLK Jr Way S are included in the FTN in the Transit Master Plan. | |
| Gatewood Elementary School | Local 22 | Arbor Heights, Westwood Village, Gatewood, Alaska Junction | 55-70 |
| | RapidRide C Line | South Lake Union, Downtown Seattle, West Seattle, Alaska Junction, Fauntleroy, Westwood Village | 7-60 |
| | | Fauntleroy Way SW is included in the FTN in the Transit Master Plan. | |
| Genesee Hill Elementary School | Commuter 57 | Alki, Alaska Junction, Genesee Hill, Admiral District, Downtown Seattle | 12-30 |
| | | California Ave SW is included in the FTN in the Transit Master Plan. | |



Table 3.10-3. Public Transit Service within One-Quarter Mile of Potential BEX VI Project Sites

| | | | · |
|--------------------------------|---------------------|---|--|
| Potential Project Site | Transit Route | Destinations Served Frequent Transit Network (FTN) Designation | Typical Weekday Frequency (minutes) |
| Leschi Elementary School | Local 8 | Seattle Center, Capitol Hill, Central District, Mount Baker | 12-30 |
| | 27 | Colman Park, Leschi Park, Downtown Seattle | 25-30 |
| | | 10th Avenue E / E Roy Street / Broadway E is included in the FTN in the Transit Master Plan. | |
| Lowell Elementary School | Local 10 | Capitol Hill, Downtown Seattle | 15-30 |
| | 49 | University District, Broadway, Downtown Seattle | 15-30 |
| | 60 | Westwood Village, White Center, Olson/Meyers P&R, Georgetown, Beacon Hill, First Hill, Broadway | 10-20 |
| | Commuter 9 | Rainier Beach, Columbia City, Seattle University, Broadway | 15-30 |
| Roxhill Elementary School | Local 21 | Arbor Heights, Roxhill, Westwood Village, High Point, West Seattle, Downtown Seattle | 11-30 |
| | 22 | Arbor Heights, Gatewood, Alaska Junction | 55-70 |
| | RapidRide Line C | South Lake Union, Downtown Seattle, West Seattle, Alaska Junction, Fauntleroy, Westwood Village | 7-60 |
| | | SW Roxbury Street, 35 th Avenue SW, and SW Barton Street are included in the FTN in the Transit Master Plan. | |
| Sacajawea Elementary School | Local 73 | Jackson Park, Maple Leaf, Roosevelt, University District | 30-60 |
| | 372 | Bothell, Kenmore, Lake Forest Park, Lake City, University District | 13-30 |
| | Commuter 322 | Kenmore, Lake Forest Park, Lake City, Roosevelt, First Hill | 30-60 |
| | | Lake City Way NE is included in the FTN in the Transit Master Plan. | |



Table 3.10-3. Public Transit Service within One-Quarter Mile of Potential BEX VI Project Sites

| | | Deticities Const. | , |
|--|---------------------|--|-------------------------------------|
| Potential Project Site | Transit Route | Destinations Served Frequent Transit Network (FTN) Designation | Typical Weekday Frequency (minutes) |
| Stevens Elementary School | Local | | |
| | 10 | Capitol Hill, Downtown Seattle | 15-30 |
| | 12 | Interlaken Park, Seattle University, First Hill, Downtown Seattle | 10-30 |
| | | 15 th Avenue E and 10 th Avenue E are included in the FTN in the Transit Master Plan. | |
| Wedgwood Elementary School | Local 65 | Jackson Park, Lake City, Wedgwood, Children's Hospital, University District | 15 |
| | 372 | Bothell, Kenmore, Lake Forest Park, Lake City, University District | 13-30 |
| K-8 Schools | | | |
| Louisa Boren STEM K-8 | RapidRide | | |
| | H Line | Burien, White Center, Westwood Village, Delridge, Downtown Seattle | 7-10 |
| | | Delridge Way SW is included in the FTN in the Transit Master Plan and is recommended for upgrade to Very Frequent status. | |
| Cascade Parent Partnership at North Queen Anne | Local 3 & 4 | Seattle Pacific University, East Queen Anne, Seattle Center, Downtown Seattle, First Hill, Seattle University, Cherry Hill, Madrona, Judkins Park | 6-15 |
| | 13 | Seattle Pacific University, Queen Anne, Seattle Center, Downtown Seattle | 12-30 |
| | 31 & 32 | Children's Hospital, University District, Wallingford, Fremont, Seattle Pacific University, Seattle Center, Magnolia | 20-30 |
| | | Nickerson Street is included in the FTN in the Transit Master Plan. | |
| Salmon Bay K-8 (James Monroe School) | Commuter 994 | University Preparatory Academy, Lakeside School, Downtown Seattle, Seattle Center, Magnolia, Ballard, Greenwood, Ravenna, Lake City, Haller Lake | One departure each direction |
| | RapidRide D Line | Crown Hill, Ballard, Interbay, Uptown, Downtown Seattle | 7-16 |
| | | 15 th Avenue NW is included in the FTN in the Transit Master Plan and is recommended for upgrade to Very Frequent service. | |



Table 3.10-3. Public Transit Service within One-Quarter Mile of Potential BEX VI Project Sites

| Potential Project Site | Transit Route | Destinations Served Frequent Transit Network (FTN) Designation | Typical Weekday Frequency (minutes) |
|------------------------------|--------------------|---|--|
| Middle Schools | | | |
| Aki Kurose Middle School | Local 7 | Prentice St, Rainier Beach, Columbia City, Downtown Seattle | 7-15 |
| | 106 | Renton, Skyway, Rainier Beach, Chinatown/International District | 10-30 |
| | Commuter 9 | Rainier Beach, Columbia City, Seattle University, Broadway | 15-30 |
| | | MLK Jr Way S and Rainier Avenue S are included in the FTN in the Transit Master Plan. | |
| Eckstein Middle School | Local 65 | Jackson Park, Lake City, Wedgwood, Children's Hospital, University District | 15 |
| | 79 | Green Lake P&R, Roosevelt, Wedgwood, Hawthorne Hills, University District | 13-30 |
| | 372 | Bothell, Kenmore, Lake Forest Park, Lake City, University District 25th Avenue NE and 35th Avenue NE are included in the FTN in the Transit Master Plan. | 20-60 |
| Jane Addams Middle School | Local 65 | Jackson Park, Lake City, Wedgwood, Children's Hospital, University District | 15 |
| | 372 | Bothell, Kenmore, Lake Forest Park, Lake City, University District | 20-60 |
| | Commuter 322 | Kenmore, Lake Forest Park, Lake City, Roosevelt, First Hill | 30-60 |
| | | 35th Avenue NE and SR 522 are included in the FTN in the Transit Master Plan. | |



Table 3.10-3. Public Transit Service within One-Quarter Mile of Potential BEX VI Project Sites

| | T | Destinations Comed | Tomical West 1 |
|-------------------------------------|---------------------|--|-------------------------------------|
| Potential Project Site | Transit Route | Destinations Served Frequent Transit Network (FTN) Designation | Typical Weekday Frequency (minutes) |
| Madison Middle School | Local | | (minutes) |
| Madison Middle School | 50 | Alki, Admiral District, Alaska Junction, SODO, VA Medical Center, Beacon Hill, Columbia City, Seward Park, Othello Station | 18-30 |
| | 128 | North Admiral, Alaska Junction, South Seattle College, White Center, Tukwila, Southcenter | 15-30 |
| | Commuter 57 | Alki, Alaska Junction, Genesee Hill, Admiral District, Downtown Seattle | 15-60 |
| | | The Transit Master Plan Recommends California Avenue SW for upgrade to the FTN. | |
| Robert Eagle Staff Middle School | Local 20 | Lake City, Northgate, Green Lake, University District | 12-60 |
| | RapidRide E Line | Aurora Village Transit Center, Shoreline, Bitter Lake, West Green Lake, Downtown Seattle | 6-15 |
| | | Aurora Avenue N is included in the FTN in the Transit Master Plan. | |
| Van Asselt Interim School | Local 36 | Othello Station, Beacon Hill, Jefferson Park, Chinatown/International District, Downtown Seattle | 7-15 |
| | 107 | Beacon Hill, Georgetown, Rainier Beach, Lakeridge, Renton | 10-30 |
| Whitman Middle School | Local 40 | Northgate, Crown Hill, Ballard, Fremont, Downtown Seattle | 7-30 |
| | RapidRide D Line | Crown Hill, Ballard, Interbay, Uptown, Downtown Seattle | 7-16 |
| | | Holman Road NW is included in the FTN in the Transit Master Plan. | |



Table 3.10-3. Public Transit Service within One-Quarter Mile of Potential BEX VI Project Sites

| Potential Project Site | Transit Route | Destinations Served Frequent Transit Network (FTN) Designation | Typical Weekday Frequency (minutes) |
|--------------------------|---------------------------------------|---|--|
| High Schools | | | |
| Ballard High School | Commuter 994 | University Preparatory Academy, Lakeside School, Downtown Seattle, Seattle Center, Magnolia, Ballard, Greenwood, Ravenna, Lake City, Haller Lake | One departure each direction |
| | RapidRide D Line | Crown Hill, Ballard, Interbay, Uptown, Downtown Seattle | 7-16 |
| | | 15 th Avenue NW is included in the FTN in the Transit Master Plan. | |
| Chief Sealth High School | Local 22 | Arbor Heights, Gatewood, Alaska Junction | 55-70 |
| | RapidRide H Line | Burien, White Center, Westwood Village, Delridge, Downtown Seattle | 7-10 |
| | | Delridge Way SW is included in the FTN in the Transit Master Plan and is recommended for upgrade to Very Frequent service. | |
| Franklin High School | Local 7 | Prentice St, Rainier Beach, Columbia City, Downtown Seattle | 7-15 |
| | 14 | Mount Baker, Downtown Seattle | 15-30 |
| | 106 | Renton, Skyway, Rainier Beach, Chinatown/International District | 10-30 |
| | Commuter 9 | Rainier Beach, Columbia City, Seattle University, Broadway | 15-30 |
| | Light Rail Mount Baker Station | Angle Lake, Sea-Tac Airport, Tukwila, South Seattle, SODO, Downtown, Capitol Hill, University of Washington, University District, Roosevelt and Northgate; will extend to Federal Way and Lynnwood in 2024. | 8-10 |
| | | Rainier Avenue S is included in the FTN in the Transit Master Plan. | |



Table 3.10-3. Public Transit Service within One-Quarter Mile of Potential BEX VI Project Sites

| Potential Project Site | Transit Route | Destinations Served Frequent Transit Network (FTN) Designation | Typical Weekday Frequency (minutes) |
|--|---|---|--|
| Interagency High School – Columbia Site | Local 50 | Alki, Admiral District, Alaska Junction, SODO, VA Medical Center, Beacon Hill, Columbia City, Seward Park, Othello Station | 18-30 |
| | 7 | Prentice St, Rainier Beach, Columbia City, Downtown Seattle | 7-15 |
| | 106 | Renton, Skyway, Rainier Beach, Chinatown/International District | 10-30 |
| | Commuter 9 | Rainier Beach, Columbia City, Seattle University, Broadway | 15-30 |
| | Light Rail Columbia City Station | Angle Lake, Sea-Tac Airport, Tukwila, South Seattle, SODO, Downtown, Capitol Hill, University of Washington, University District, Roosevelt and Northgate; will extend to Federal Way and Lynnwood in 2024. | 8-10 |
| | | MLK Jr Way S and Rainier Avenue S are included in the FTN in the Transit Master Plan. | |
| Ingraham High School | Local 345 | Shoreline Community College, Haller Lake, Northwest Hospital, North Seattle College, Northgate | 18-30 |
| | 346 | Aurora Village, Shoreline Community College, Haller Lake, Northwest Hospital, North Seattle College, Northgate | 20-30 |
| | RapidRide E Line | Aurora Village Transit Center, Shoreline, Bitter Lake, West Green Lake, Downtown Seattle | 6-15 |
| | | N 130 th Street is included in the FTN in the Transit Master Plan. | |



Table 3.10-3. Public Transit Service within One-Quarter Mile of Potential BEX VI Project Sites

| Potential Project Site | Transit Route | Destinations Served Frequent Transit Network (FTN) Designation | Typical Weekday Frequency (minutes) |
|---------------------------------|------------------|--|--|
| John Marshall Interim School | Local 20 | Lake City, Northgate, Green Lake, University District | 12-60 |
| | 45 | Loyal Heights, Greenwood, Green Lake, Roosevelt, University District, Seattle Children's Hospital | 8-30 |
| | 62 | Sand Point, Ravenna, Roosevelt, Green Lake, Wallingford, Fremont, Downtown Seattle | 8-30 |
| | 79 | Green Lake P&R, Roosevelt, Wedgwood, Hawthorne Hills, University District | 20-60 |
| | Commuter 322 | Kenmore, Lake Forest Park, Lake City, Roosevelt, First Hill | 30-60 |
| | | NE 65 th Street, NE Ravenna Place, and Roosevelt Way NE are included in the FTN in the Transit Master Plan; Roosevelt is recommended for upgrade to Very Frequent service. | |
| Nathan Hale High School | Local 65 | Jackson Park, Lake City, Wedgwood, Children's Hospital, University District | 15 |
| | 372 | Bothell, Kenmore, Lake Forest Park, Lake City, University District | 20-60 |
| | Commuter 322 | Kenmore, Lake Forest Park, Lake City, Roosevelt, First Hill | 30-60 |
| | | 35 th Avenue NE and SR 522 are included in the FTN in the Transit Master Plan. | |



Table 3.10-3. Public Transit Service within One-Quarter Mile of Potential BEX VI Project Sites

| D | Transit | Destinations Served | Typical Weekday |
|------------------------------------|------------------------------------|---|---------------------|
| Potential Project Site | Route | Frequent Transit Network (FTN) Designation | Frequency (minutes) |
| Roosevelt High School | Local 45 | Loyal Heights, Greenwood, Green Lake, Roosevelt, University District, Seattle Children's Hospital | 8-30 |
| | 62 | Sand Point, Ravenna, Roosevelt, Green Lake, Wallingford, Fremont, Downtown Seattle | 8-30 |
| | 67 | Northgate, Roosevelt, University District, Children's Hospital | 15 |
| | 73 | Jackson Park, Maple Leaf, Roosevelt, University District | 30-60 |
| | Commuter | | |
| | 322 | Kenmore, Lake Forest Park, Lake City, Roosevelt, First Hill | 30-60 |
| | 522 | Woodinville Park & Ride, Bothell, Lake City, Roosevelt Station | 15-25 |
| | Light Rail Roosevelt Station | Angle Lake, Sea-Tac Airport, Tukwila, South Seattle, SODO, Downtown, Capitol Hill, University of Washington, University District, Roosevelt and Northgate; will extend to Federal Way and Lynnwood in 2024. | 8-10 |
| | | NE 65 th Street, Roosevelt Way NE, and 12 th Avenue NE are included in the FTN in the Transit Master Plan. | |
| Seattle World School at T.T. Minor | Local 2 | West Queen Anne, Seattle Center West, Downtown Seattle, First Hill, Seattle University, Madrona Park | 15-30 |
| | 11 | Madison Park, Capitol Hill, Downtown Seattle | 15-30 |
| | 12 | Interlaken Park, Seattle University, First Hill, Downtown Seattle | 10-30 |
| | | E Madison Street is included in the FTN in the Transit Master Plan and is recommended for upgrade to Very Frequent service. | |



Table 3.10-3. Public Transit Service within One-Quarter Mile of Potential BEX VI Project Sites

| Potential Project Site | Transit Route | Destinations Served Frequent Transit Network (FTN) Designation | Typical Weekday Frequency (minutes) |
|---|------------------|--|--|
| West Seattle High School | Local 50 | Alki, Admiral District, Alaska Junction, SODO, VA Medical Center, Beacon Hill, Columbia | 18-30 |
| | 128 | North Admiral, Alaska Junction, South Seattle College, White Center, Tukwila, Southcenter | 15-30 |
| | | The Transit Master Plan recommends California Avenue SW for upgrade to Frequent service and inclusion in the FTN. | |
| Other Sites | | | |
| Southwest Athletic Complex and Old Denny Middle School Site | Local 22 | Arbor Heights, Gatewood, Alaska Junction | 55-70 |
| | 60 | Westwood Village, White Center, Olson/Meyers P&R, Georgetown, Beacon Hill, First Hill, Broadway | 10-20 |
| | 125 | Westwood Village, West Seattle, South Seattle College, Downtown Seattle | 20-40 |
| | | 35 th Avenue SW and Delridge Way SW are included in the FTN in the Transit Master Plan; Delridge is recommended for upgrade to Very Frequent service. | |

Sources for schedules (all last accessed in December 2023): https://www.soundtransit.org/; https://kingcounty.gov/en/dept/metro; https://www.seattle.gov/transportation/getting-around/transit/streetcar/first-hill-line.

Note: Seattle's Frequent Transit Network (FTN), consisting of transit corridors that connect the city's urban centers and villages with frequent, reliable transit service within a short walk for most residents. The FTN corridors are identified in the City's Transit Master Plan (SDOT, 2016).



Table 3.10-4. Non-Motorized Characteristics at Potential BEX VI Project Sites

| Facility Name | Non-Motorized Characteristics / Recommended Bicycle Master Plan Projects |
|-------------------------------------|---|
| Elementary Schools | |
| Arbor Heights Elementary School | The area has an incomplete sidewalk system, with most residential streets adjacent to the school having missing or discontinuous sidewalk on one or both sides of the street. Marked crosswalks are provided at several unsignalized intersections near the school site. |
| | Recommended future projects in the Bicycle Master Plan (BMP) in the site vicinity include provision of connected greenways northwest of the site along SW 98 th Street, California Avenue SW, SW 104 th Street, and 37 th Avenue SW. The Plan also recommends a protected bicycle lane on 35 th Avenue SW (north of 106 th Street) and minor in-street separation (south of 106 th Street). |
| Bailey Gatzert Elementary School | The area has a complete sidewalk system. There are painted bicycle lanes on E Yesler Way, with minor in-street separation on the north side of the street. There are painted bicycle lanes on both sides of 12 th Avenue (north of Yesler), and on 14 th Avenue S (south of Yesler). Marked crosswalks are provided at several unsignalized intersections and all signalized intersections adjacent to the school site. |
| | Recommended future projects in the BMP in the site vicinity include provision of protected bicycle lanes (south of E Yesler Way) on 12 th Avenue S and Boren Avenue, as well as a protected bicycle lane on E Yesler Way (east of 14 th Avenue S). |
| Bryant Elementary School | The area has a complete sidewalk system. Marked crosswalks are provided at several unsignalized intersections adjacent to the school site. |
| | Recommended future projects in the BMP in the site vicinity include provision of neighborhood greenways on 27 th Avenue NE, NE 60 th Street, 33 rd Avenue NE and 34 th Avenue NE. The Plan also recommends minor in-street separation along 35 th Avenue N. |
| Concord Elementary School | The area adjacent to the site has a complete sidewalk system. Marked crosswalks are provided at several unsignalized intersections adjacent to the school. S Henderson Street is designated as a neighborhood greenway, and there is a pedestrian bridge across SR 99 to the east, with connection to marked bicycle routes and other greenways. |
| | Recommended future projects in the BMP in the site vicinity include provision of minor instreet separation connecting S Cloverdale Street, 7 th Avenue S, S Trenton Street, and 8 th Avenue S. |
| Dearborn Park Elementary School | The area has an incomplete sidewalk system, with most residential streets adjacent to the school having missing or discontinuous sidewalk on one or both sides of the street. There is direct access from the site to Chief Sealth Trail. Marked crosswalks are provided at several unsignalized intersections and mid-block crossings of S Orcas Street adjacent to the school site. |
| | Recommended future projects in the BMP in the site vicinity include provision of a neighborhood greenway on S Dawson Street, an off-street bicycle path along Beacon Avenue S, minor in-street separation along S Orcas Street (east of Chief Sealth Trail), and a protected bicycle lane on MLK Jr Way S. |



Table 3.10-4. Non-Motorized Characteristics at Potential BEX VI Project Sites

| Facility Name | Non-Motorized Characteristics / Recommended Bicycle Master Plan Projects |
|------------------------------------|--|
| Gatewood Elementary School | The area has a complete sidewalk system. Fauntleroy Way SW has a painted bicycle lane on the south eastside of the street and sharrows on the northwest side. There are painted bicycle lanes on both sides of California Avenue SE. There are marked, single-leg crosswalks adjacent to the site across Fauntleroy Way SW, SW Myrtle Street, and California Avenue SW. |
| | Recommended future projects in the BMP in the site vicinity include provision of a protected bicycle lane on Fauntleroy Way SW. |
| Genessee Hill Elementary School | The area has a complete sidewalk system. Marked crosswalks are provided at several unsignalized intersections adjacent to the school site. |
| | Recommended future projects in the BMP in the site vicinity include provision of a neighborhood greenway on 48th Avenue SW and minor in-street separations on SW Charlestown Street, SW Genessee Street, and 55th Avenue SW. |
| Leschi Elementary School | The area has a complete sidewalk system, except for the residential dead-end on E Yesler Way (east of the site). There are several marked crosswalks at unsignalized intersections adjacent to and near the site. There is a painted bicycle lane on the north side of E Yesler Way west of 31st Avenue that connects to a painted bicycle lane on the west side of 31st Avenue S south of E Yesler Way. |
| | Recommended future projects in the BMP in the site vicinity include provision of a neighborhood greenway on 31st Avenue north of E Yesler Way, a neighborhood greenway on 30th Avenue S, and a protected bicycle lane on MLK Jr Way S. |
| Lowell Elementary School | The area has a complete sidewalk system. Marked crosswalks are provided at several unsignalized intersections and all signalized intersections near the school site. There are bicycle facilities on several roadways in the vicinity, including sharrows on 10th Avenue E and E Aloha Street, painted bike lanes on E Aloha Street, and neighborhood greenways on E Roy Street and 13th Avenue E. |
| | Recommended future projects in the BMP in the site vicinity include provision of neighborhood greenways along Federal Avenue E, 14th Avenue E and E Republican Street, minor in-street separation on 12th Avenue E; and a protected bicycle lane on 10th Avenue E continuing onto Broadway. |
| Roxhill Elementary School | The streets adjacent to the site feature sidewalks, but some of the local streets near the school are missing sidewalks on one side of the street. Marked crosswalks are provided at several intersections adjacent to the school site, including fully signalized intersections, unsignalized intersections, and crossings accompanied by RRFBs. 30th Avenue SW and SW Cambridge Street are designated as neighborhood greenways. |
| | Recommended future projects in the BMP in the site vicinity include provision of a neighborhood greenway on 34th Avenue SW and 25th Avenue SW, minor in-street separation on SW Barton Place, and protected bicycle lanes on 35th Avenue SW and SW Roxbury Street. |



Table 3.10-4. Non-Motorized Characteristics at Potential BEX VI Project Sites

| Facility Name | Non-Motorized Characteristics / Recommended Bicycle Master Plan Projects |
|--|--|
| Sacajawea Elementary School | There are sidewalks along the site's east frontage, but there are no other sidewalks on the majority of nearby streets. Marked crosswalks and pedestrian signals are provided at the nearby signalized intersection on Lake City Way NE, and there are some marked, single-leg crossings at unsignalized intersections near the site. |
| | Recommended future projects in the BMP in the site vicinity include provision of neighborhood greenways on NE 98th Street and 20th Avenue NE. |
| Stevens Elementary School | The area has a complete sidewalk system. Marked crosswalks are provided at several unsignalized intersections near the site. There are bicycle sharrows on 19 th Avenue E and on E Galer Street east of 19 th Avenue E. There is a continuous designated neighborhood greenway connecting Interlaken Drive E to E Galer Street to 20 th Avenue E. |
| | Recommended future projects in the BMP in the site vicinity include provision of neighborhood greenways along 18 th Avenue E and 21 st Avenue E, and minor in-street separation on E Galer Street west of 19 th Avenue E. |
| Wedgwood Elementary School | All school frontages have sidewalks, but they are intermittent or absent in the surrounding area. Marked crosswalks are provided at the unsignalized intersection adjacent to the school site. Ravenna Avenue NE has a marked bike lane in the southbound direction and sharrows in the northbound direction. |
| | Recommended future project in the BMP in the site vicinity includes provision of a neighborhood greenway connecting 31 st Avenue NE, NE 85 th Street and 32 nd Avenue NE, and a protected bicycle lane on 35 th Avenue NE. |
| K-8 Schools | |
| Louisa Boren STEM K-8 | The area has an incomplete sidewalk system, with most residential streets adjacent to the school having missing or discontinuous sidewalk on one or both sides of the street. There is an in-street bicycle lane with minor separation on the west side of Delridge Way SW (south of SW Juneau Street). SW Juneau Street has painted sharrows and painted bicycle connectors at the intersection with Delridge. Neighborhood greenways are designated along 25th Avenue SW, SW Juneau Street, Croft Place SW, and 21st Avenue SW. Marked crosswalks are provided at the signalized intersections near the school site, and there are several marked mid-block crossings across Delridge with accompanying RRFBs. |
| | Recommended future projects in the BMP in the site vicinity include provision of a protected bicycle lane on Delridge Way SW. |
| Cascade Parent Partnership at North Queen Anne | The area has a mostly-complete sidewalk system, although there are sidewalks on only one side of the street where 3 rd Avenue W is separated by a difference in elevation and there is a raised separation but no formal sidewalk on the west side of 1 st Avenue W. There are marked crosswalks across 3 rd Avenue W at two unsignalized intersections near the school site. |
| | Recommended future projects in the BMP in the site vicinity include designating 3 rd Avenue W and Florentia Street as shared use streets connecting to a larger network of neighborhood greenways and minor in-street facilities. |



Table 3.10-4. Non-Motorized Characteristics at Potential BEX VI Project Sites

| Facility Name | Non-Motorized Characteristics / Recommended Bicycle Master Plan Projects |
|---|---|
| Salmon Bay K-8 (James Monroe School) | The area has a complete sidewalk system. There are marked crossing at the signalized intersections with 15 th Avenue NW and RRFBs accompanying marked crossings of NW 65 th Street. There are sharrows on NE 65 th Street and painted bicycle lanes on both sides of 24 th Avenue NW and painted bicycle lanes on both sides of 20 th Avenue NW south of NW 65 th Street. |
| | Recommended future projects in the BMP in the site vicinity include provision of neighborhood greenways along NW 70 th St, NW 64 th Street, and 17 th Avenue NW. |
| Middle Schools | |
| Aki Kurose Middle School | The area has a complete sidewalk system. Marked crosswalks are provided at several unsignalized intersections and all signalized intersections near the site. Adjacent to the site, 39th Avenue S is designated as a neighborhood greenway. |
| | Recommended future projects in the BMP in the site vicinity include provision of neighborhood greenways on S Juneau Street, 42 nd Avenue S, and S Holly Street, as well as minor in-street separation along S Orcas Street and a protected bicycle lane on MLK Jr Way S. |
| Eckstein Middle School | The area has an incomplete sidewalk system. Most streets have sidewalks, except for residential streets west of 30 th Avenue NE, and there is no sidewalk on the west side of 30 th . Marked crosswalks are provided at several unsignalized and all signalized intersections near the school site. There are painted bicycle lanes on both sides of NE 75 th Street and sharrows on 35 th Avenue NE. |
| | Recommended future projects in the BMP in the site vicinity include provision of neighborhood greenways on NW 80 th Street, 24 th Avenue NE, and 31 st Avenue NE, as well as a protected bicycle lane on 35 th Avenue NE. |
| Jane Addams Middle School | Intermittent sidewalk and asphalt pathways along frontage. Marked crosswalks are provided at two unsignalized intersections along NE 110th Street at 31st and 34th Avenues NE, and the intersection of NE 110th Street with 30th Avenue NE is all-way stop-controlled but without crosswalks. There are sharrows on 35th Avenue NE north of NE 110th Street and painted bicycle lanes south of NE 110th Street. |
| | Recommended future projects in the BMP in the site vicinity include minor in-street separation on NE 110 th Street and 30 th Avenue NE, protected bike lanes on 35 th Avenue NE, and neighborhood greenways along NE 105 th Street and 32 nd Avenue NE. |
| Madison Middle School | The area has a complete sidewalk system. Marked crosswalks are provided across all legs of the unsignalized intersection of SW Spokane Street with 45 th Ave SW and two legs of the unsignalized intersection of 45 th Ave SW with SW Hinds St. There are sharrows on the east side of California Avenue SW in the vicinity of the site. |
| | Recommended future projects in the BMP in the site vicinity include provision of minor instreet separation on SW Charlestown Street and neighborhood greenways on 48th Avenue SW, 45th Avenue SW and SW Hinds Street. |



Table 3.10-4. Non-Motorized Characteristics at Potential BEX VI Project Sites

| Facility Name | Non-Motorized Characteristics / Recommended Bicycle Master Plan Projects |
|-------------------------------------|---|
| Robert Eagle Staff Middle School | The area has a complete sidewalk system. Marked crosswalks are provided across all legs of the unsignalized intersections of Wallingford Avenue N with N 92 nd Street and N 90 th Street. There are several marked crossings of N 90 th Street at unsignalized intersections south of the site. There are neighborhood greenways along N 92 nd Street and Ashworth Avenue N. There are painted sharrows on N 92 nd Street (east of Wallingford) and on College Way N (north of N 92 nd Street). |
| | Recommended future projects in the BMP in the site vicinity include provision of neighborhood greenways on Stone Avenue N and Midvale Avenue N, as well as minor instreet separation on N 90 th Street and College Way N. |
| Whitman Middle School | All school frontages have sidewalks, but they are intermittent in the surrounding area. Marked crosswalks and pedestrian signals are provided at nearby signalized intersections. In the vicinity of the site, NW 92 nd Street and 17 th Avenue NW are designated as neighborhood greenways. |
| | Recommended future projects in the BMP in the site vicinity include provision of minor instreet separation on 15th Avenue NW and a neighborhood greenway on NW 90th Street. |
| Van Asselt Interim School | Beacon Avenue S has sidewalks, but they are intermittent in the surrounding area. Marked crosswalks are provided at the northeast and southeast corners of the school site. There are painted bicycle lanes on both sides of S Myrtle Street and sharrows on Beacon Avenue S. There are marked crosswalks on all of the outer legs of the signalized intersection of Beacon Avenue S with S Myrtle Street and marked mid-block crosswalks on Beacon Avenue S (south of S Myrtle Street). |
| | Recommended future project in the BMP in the site vicinity includes provision of an off-street trail along the Beacon Avenue S corridor, a protected bicycle lane on S Myrtle Place, and minor in-street separations on S Othello Street connecting to Military Road S. |
| High Schools | |
| Ballard High School | The area has a complete sidewalk system. Marked crosswalks are provided at the signalized intersections along 15 th Avenue NW, and at unsignalized intersections along NW 65 th Street adjacent to the school. NW 65 th Street has sharrows, and 8 th Avenue NW has painted bicycle lanes. 17 th Avenue NW is designated as a neighborhood greenway. |
| | Recommended future projects in the BMP in the site vicinity include neighborhood greenways along NW 64 th Street, NW 70 th Street, 12 th Avenue NW, and 17 th Avenue NW, and provision of protected bicycle lane along 14 th Avenue NW between NW 58 th Street and NW 65 th Street. |



Table 3.10-4. Non-Motorized Characteristics at Potential BEX VI Project Sites

| Facility Name | Non-Motorized Characteristics / Recommended Bicycle Master Plan Projects |
|--|--|
| Chief Sealth High School | The area has a mostly-complete sidewalk system, although some of the local access streets north of the school lack sidewalks on one or both sides. There are marked crosswalks n two legs of the unsignalized intersection of SW Kenyon Street with 26th Avenue SW and one marked crosswalk on the west leg of SW Thistle Street's unsignalized intersection with 26th Avenue SW. |
| | Recommended future projects in the BMP in the site vicinity include neighborhood greenways 34th Avenue SW and 17th Avenue SW, as well as minor in-street separation on SW Thistle Street and a protected bicycle lane on 35th Avenue SW. |
| Franklin High School | The area has a complete sidewalk system. Crosswalks are provided at nearby signalized and unsignalized intersections, and there is an elevated, accessible pedestrian bridge over Rainier Avenue S and MLK Jr Way S providing connection to Mt. Baker Station. East of the site, 34th Avenue S is designated as a neighborhood greenway, and S McClellan Street north of the site has painted bicycle lanes on both sides of the street |
| | The BMP identifies the area near the school as the site of a catalyst project; these projects are located at choke points in the network where complex intersection configurations and/or topography require creative or complex solutions. The Plan recommends protected bicycle lanes on Rainier Avenue S and MLK Jr Way S, minor in-street separation on Mt. Baker Avenue, and a neighborhood greenway on 31st Avenue S connecting to existing painted bicycle lanes. |
| Ingraham High School | All school frontages have sidewalks and most of the streets in the surrounding area have sidewalks. Adjacent to the athletic complex, there is no sidewalk on the west side of Ashworth, and Meridian Avenue N has missing and intermittent or missing sidewalks. Meridian Avenue N has sharrows. Marked crosswalks and pedestrian signals are provided at nearby signalized intersections. |
| | Recommended future projects in the BMP in the site vicinity include provision of protected bicycle lanes on N 130th Street and 5th Avenue NE, as well as neighborhood greenways on N 135th Street, Ashworth Avenue N, and N 131st Street. |
| Interagency High School – Columbia Site | The area has a complete sidewalk system. Marked crosswalks and pedestrian signals are provided at nearby signalized intersections, and there are marked crosswalks at several nearby unsignalized intersections. There is a neighborhood greenway southeast of the site that includes a portion of 37th Avenue S. |
| | Recommended future projects in the BMP in the site vicinity include provision of connected neighborhood greenways along Edmunds Street to S Ferdinand Street, and extension of the neighborhood greenway on 35th Avenue S to the north and south, and protected bicycle lanes on MLK Jr Way and S Alaska Street. |



Table 3.10-4. Non-Motorized Characteristics at Potential BEX VI Project Sites

| Facility Name | Non-Motorized Characteristics / Recommended Bicycle Master Plan Projects |
|---------------------------------------|--|
| John Marshall Interim School | The area has a complete sidewalk system. Crosswalks are provided at nearby signalized and unsignalized intersections. There are sharrows on NE 65th Street (east of Ravenna) and painted bicycle lanes (west of Ravenna). NE Ravenna Boulevard has protected bicycle lanes on both sides of the street. |
| | Recommended future projects in the BMP in the site vicinity include a neighborhood greenway on NE 68th Street, minor in-street separation on Weedin Place, and protected bicycle lanes on Roosevelt Way NE, 12th Avenue NE, and NE 65th Street. |
| Nathan Hale High School | All school frontages have sidewalks, but they are intermittent in the surrounding area. Marked crosswalks are provided at two unsignalized intersections along NE 110 th Street, and the intersection of NE 110 th Street with 30 th Avenue NE is all-way stop-controlled but without crosswalks. There are sharrows on 35 th Avenue NE north of NE 110 th Street and painted bicycle lanes south of NE 110 th Street. |
| | Recommended future projects in the BMP in the site vicinity include minor in-street separation on NE 110 th Street and 30 th Avenue NE, protected bike lanes on 35 th Avenue NE, and neighborhood greenways along NE 105 th Street and 32 nd Avenue NE. |
| Roosevelt High School | The area has a complete sidewalk system. Crosswalks are provided at signalized intersections in the area, and at unsignalized intersections adjacent to the school. Painted bicycle lanes are provided along 12 th Avenue NE and Roosevelt Way NE. |
| | Recommended future projects in the BMP in the site vicinity include minor in-street separation on 15th Avenue NE, neighborhood greenways on NE 66th Street and Brooklyn Avenue NE to the south of the school, and protected bicycles lanes on 12th Avenue NE and Roosevelt Way N. |
| Seattle World School at T.T. Minor | The area has a complete sidewalk system. Crosswalks are provided at the signalized intersection of 18th Avenue NE with E Union Street at the southeast corner of the site, and there are other marked crosswalks at unsignalized intersections along E Union Street near the school. There are painted bicycle lanes along E Union Street. |
| | Recommended future projects in the BMP in the site vicinity includes neighborhood greenway connecting 17th Avenue NE (north of the site), E Pike Street (northeast of the site), and 18th Avenue (east of the site). The Plan also recommends provision of protected bicycle lanes on E Union Street. |
| West Seattle High School | All school frontages have sidewalks, but they are missing on one or both sides of some adjacent and nearby residential streets. There are marked crosswalks at all of the signalized intersections of California Avenue SW west of the site and of SW Admiral Way north of the site. There are painted sharrows and bicycle lanes on SW Admiral Way near the site. |
| | Recommended future projects in the BMP in the site vicinity include provision of neighborhood greenways along 42 nd Avenue SW, SW Lander Street, and Walnut Avenue SW, and protected bicycle lanes along SW Admiral Way. |



Table 3.10-4. Non-Motorized Characteristics at Potential BEX VI Project Sites

| Facility Name Other Sites | Non-Motorized Characteristics / Recommended Bicycle Master Plan Projects |
|---|--|
| Other Sites | |
| Southwest Athletic Complex and Old Denny Middle School Site | The area has a complete sidewalk system. There are marked crosswalks at the unsignalized intersections at the northeast and southeast corners of the site, east of 26th Avenue SW. There are also crosswalks on all legs of the unsignalized, all-way stop-controlled intersection of 30th Avenue SW with SW Thistle Street, marked with additional overhead and in-road flashing beacons. 30th Avenue SW is designated as a neighborhood greenway, and there are sharrows on SW Thistle Street and Delridge Way SW. |
| | Recommended future projects in the BMP in the site vicinity include provision of minor instreet separation on SW Thistle Street and a continuous neighborhood greenway connected by segments of 27th Avenue SE and 26th Avenue SW adjacent to the school to the north and east, respectively. |

Sources: SDOT Bike Map, https://www.seattle.gov/transportation/projects-and-programs/programs/bike-program/bike-web-map; City of Seattle BMP (2014) and 2021-2024 Implementation Plan (May 2021).

