## SEPA Addendum to the 2020 SEPA Determination of Non-Significance for

## Solid Waste Storage and Access Amendments

**February 2025**

The following is a SEPA Addendum, which supplements the SEPA Determination of Non-Significance (DNS) for a prior version of this proposal. The DNS was issued on March 9, 2020. The proposal remains substantially similar to the prior proposal, but has been updated in ways that removes certain prior proposed changes, differently states certain code provisions, and amends certain provisions in ways that change the meaning of the solid waste code requirements.

SEPA encourages using analyses of a prior proposal where relevant. RCW 43.21C.034; see WAC 197-11-030(2)(b).[1] The current and prior proposals "need not be identical, but must have similar elements that provide a basis for comparing their environmental consequences."[2]

This SEPA Addendum interprets and discloses how the proposed revised code amendments affect the environmental impact findings described in the prior DNS. It does not identify any new probability for significant adverse environmental impacts, but evaluates the possibility of new or additional environmental impacts due to the proposed revisions.

### BACKGROUND

Solid waste storage and access requirements in the Land Use Code are important to ensure appropriate on-site solid waste storage, and safe and efficient solid waste collection services. The proposal seeks to revise code requirements to:

- Clarify the code to increase the efficiency of development design and permit reviews; and
- Define thorough and up-to-date solid waste requirements consistent with the City's policies and solid waste-related operational practices. This will support the policy priorities to improve recycling rates to reach a citywide goal of 70% recycling rate by volume, and improve safety.

Seattle Public Utilities (SPU), the Seattle Department of Construction and Inspections (SDCI), and Seattle Department of Transportation (SDOT) review development proposals for consistency with

[1] WAC 197-11-402(7) ("Agencies shall reduce paperwork and the accumulation of background data by adopting or incorporating by reference, existing, publicly available environmental documents, wherever possible."); WAC 197-11-640 ("Any environmental document . . . may be combined with any other agency documents to reduce duplication and paperwork and improve decision making.").

[2] RCW 43.21C.034; see WAC 197-11-600(2) (proposal under consideration may be "different than [the proposal] analyzed in the existing documents").

solid waste-related code requirements. Various requirements in the Seattle Municipal Code (SMC) addressing solid waste services and rights-of-way are relevant, but new development is most directly affected by the requirements of the Land Use Code.

## PROPOSAL DESCRIPTION

SPU is proposing to amend the Land Use Code, including but not limited to Section 23.54.040, to update the regulatory standards addressing solid waste, recycling, and composting materials (collectively identified here as "solid waste") storage and access. The proposal addresses details including amount, location, and configuration of solid waste storage spaces, collection containers, and accessibility and staging for regular collection, which can occur within buildings and properties or on public street rights-of-way. The proposal also accommodates flexibility in how the requirements are met, to address situations where streets and properties may challenge the ability to meet the standard requirements. The rules would apply citywide.

Since the March 2020 code proposal, the code wording has been revised in several ways, to increase its clarity, organization, and consistency with SPU's solid waste practices. The revisions also respond to other changes, including a Comprehensive Plan update to be considered in 2025, and other state requirements addressing a wider range of housing types and densities that must be accommodated going forward. The revisions also include additional details like new definitions of solid waste container types.

The following describes more details about proposed changes to the code that are evaluated for their potential environmental impacts in this SEPA Addendum.

### Revisions to the Code Proposal Evaluated for SEPA Impacts

1. **Adjust wording of solid waste requirements to cover several varieties of residential uses, and newly apply them to Neighborhood Residential (NR) zones; and clarify solid waste storage area requirements for unit lot subdivisions.**
    - Compared to 2020 when the prior proposal was written, there is a greater variety of dwelling unit types and arrangements possible within NR zones (formerly Single Family zones). The proposal includes revised wording to address solid waste requirements for this greater housing variety and newly applies them to the NR zone.
    - Compared to the 2020 proposal, the revised proposal clarifies how solid waste storage areas may be provided to "unit lot subdivisions" that are typically used for townhouse and rowhouse building types. This would newly allow for a choice between a solid waste storage area to serve multiple dwelling units, or solid waste storage to be provided on each lot. This will improve on the current code which may be inadvertently too limiting to allow for shared solid waste storage areas.

2. **Newly define applicability of solid waste requirements to "changes of use" permits involving more than 10,000 square feet of floor area in existing building uses.**

   - A change-of-use permit is required when a new, generally more intensive type of land use would newly occupy an existing building. An example is the conversion of a general office use to an automobile repair use. If the existing building has not provided solid waste storage space in the past, this new proposed standard would require that solid waste storage space meeting the code requirements be provided. This could affect the use of space in exterior and/or interior locations of the property.

3. **Revise the minimum area, and dimensional width and depth requirements for solid waste storage space, for certain size categories of residential and non-residential uses.**

   - The proposal would set new minimum linear width and depth dimensions for solid waste storage areas. These ensure that solid waste storage rooms will have sufficient amounts of space to hold and maneuver solid waste dumpsters and carts. Specifics include:

     - An increase in minimum area provision from 175 square feet to 196 square feet for non-residential uses sized between 15,000 and 50,000 square feet.

     - An increase in the minimum depth of per-unit spaces for storing solid waste containers, from 2 feet to 2.5 feet. Total proposed minimum space per unit: 2.5 feet x 6 feet.

     - An increase in the minimum dimensions of solid waste storage space for multifamily and non-residential uses (an alternate requirement to the per-unit space standards above): increase from 7x7 feet to 8x8 feet minimum dimensions for developments with up to 15 dwelling units; increase from 12x12 feet to 14x14 feet for developments with more than 15 dwelling units; and similar 8x8 feet dimensions for non-residential uses up to 15,000 square feet in floor area, and 14x14 feet for non-residential uses greater than 15,000 square feet.

4. **Define or increase the following minimum width, depth, and slope dimensions:**

   - A minimum storage area access door width of 6 feet, to allow container movements;
   - A minimum 6-foot width for pathways where dumpsters would be moved; and
   - Increase the minimum width of access routes and gates traversed by collection vehicles, from 10 feet to 12 feet. This recognizes that 12 feet is the minimum physical width allowing for certain solid waste collection vehicles to provide service from an alley location, for example. Showing these dimensions on development plans for access routes would increase the efficiency of permit reviews by confirming that collection vehicle access is possible at a given location.

5. **Update one minimum vertical height clearance requirement**

   - The proposal adds one new overhead vertical height clearance requirement: a minimum of

16 feet clearance above a "roll-off dumpster" of standard height. This slightly varies from the other height clearances already defined in the Land Use Code. It allows solid waste trucks to lift these dumpsters onto trucks and take them to an off-site disposal location, and then return them to the site.

6. **Clarify that details about solid waste containers and storage areas must be shown on building plans.**
    - The new proposal requires that details about the types, dimensions, and volume of proposed solid waste containers be provided on proposed development plans. These allow permit reviewers to more efficiently assess if the development plans meet the code requirements.

**Public Comment**

The SEPA threshold determination in March 2020 for the prior proposal included a public comment period. A subsequent SEPA appeal by an interested party was dismissed by the Hearing Examiner.

SPU has conducted approximately seven stakeholder outreach efforts since 2019, to discuss how the recommended changes may affect building design and solid waste utility services.

This SEPA addendum provides another opportunity for the public to comment on the updated proposal and the related environmental impact findings discussed below. Also, proposed changes to the Plan require City Council approval. Additional opportunity for public comment will occur during future Council hearings.

## DISCUSSION OF RELEVANCE TO SEPA ENVIRONMENTAL IMPACTS

SDCI has determined that the 2020 DNS is still relevant to the current solid waste code proposal; and it concludes that additional commentary about environmental impacts is helpful for public disclosure, regarding land use, housing, and transportation elements of the environment.

**Findings of the 2020 SEPA DNS**

The 2020 DNS did not identify any particular potential for significant adverse impacts to elements of the natural environment. This was due to lack of substantial adverse differences in how future new buildings would be developed, most notably in relation to land use patterns and low potential for impacts on the natural environment, such as due to erosion, stormwater runoff, or effects on plants, animals, air quality, noise, exposure to toxic substances, or consumption of natural resources. Similarly, the 2020 DNS did not identify any particular potential for significant adverse impacts to built-environment elements such as transportation, public services, and utilities, or relationship to historic and cultural resources that might be found during future development.

For the elements of land use, housing, and aesthetics (building bulk and scale), the 2020 DNS did not identify a likelihood of significant adverse impacts. This finding related to the lack of potentially significant land use incompatibilities between adjacent properties with future development, due to

lack of major differences caused by future building design or outdoor operations.

**Added Discussion for the 2025 Proposal**

The prior DNS' conclusions about lack of significant adverse impacts for the natural and built environment remain generally accurate. But they are supplemented by the following discussion about the potential for other adverse SEPA environmental impacts (cumulative and long-term) that could arise due to the revised proposal.

1. **Adjust wording of solid waste requirements to cover several varieties of residential uses, and newly apply them to Neighborhood Residential (NR) zones; and clarify solid waste storage area requirements for unit lot subdivisions.**

***Land Use and Housing***

Seattle's zoning currently allows a wider range of housing development opportunities in NR zones, and the variety and density of possible housing in NR zones may continue to increase. This would reflect the recommendations of an updated Comprehensive Plan that will be decided in 2025. The current proposal adjusts wording to newly cover the NR zones and the range of housing that could be present going forward, and seeks to increase the clarity of the code provisions' applicability to different types of housing units.

The proposal could lead to the provision of additional individual waste container storage spaces for each kind of dwelling unit, like accessory dwelling units. However, the possibility of sharing or pooling such storage spaces on a property would also remain, if homeowner associations provided for shared spaces. This capability is also more clearly indicated as possible for unit lot subdivisions in the current proposal, where a shared solid waste storage area could be provided to satisfy requirements for multiple unit lots rather than providing one on each unit lot.

The effect of the current solid waste proposal on site design could be to result in provision of additional waste storage spaces that would tend to consume outdoor or indoor space on a property. This includes spaces for individual units that would be minimum dimensions of 2.5 feet depth by six feet width, for which the minimum depth would be increased by one-half foot. If space is at a premium on fully developed lots, the additional space consumed could create additional siting challenges to fit all needed uses and features. However, the magnitude of this potential adverse impact would be minor.

Development applicants would be able to continue designing new developments that comply with minimum requirements without experiencing major design challenges. And, a degree of regulatory flexibility would also continue to be present in the proposed code, which means that alternative designs and locations for solid waste storage spaces would be possible for the City to approve, if there are significant constraints on a given site. Thus, no new potential for significant adverse impacts on land use or provision of housing would be likely.

**2. Newly define applicability of solid waste requirements to "changes of use" permits involving more than 10,000 square feet of floor area in existing building uses.**

***Land Use and Housing***

The proposal accounts for the possibility that existing buildings would newly need to provide solid waste storage features, for an action that requires a "change of use" permit. This might lead to the need to retrofit building spaces with indoor storage features, or accommodate outdoor storage locations, and determine collection vehicle access arrangements.

This requirement is proposed to apply to actions requiring a change of use permit for uses with more than 10,000 square feet of floor area. For comparison, a typical small single-business tenant space may range from 3,000 - 6,000 square feet. So, this requirement could affect a relatively broad range of uses including small-to-medium sized single-use buildings or one or more tenant spaces in a larger building.

The intent of the proposal is to remedy over time the lack of defined solid waste storage spaces for existing buildings, which has a beneficial purpose for accommodating efficient solid waste service. But at the same time, due to a wide range of possible characteristics of individual sites and buildings, adding new solid waste storage spaces could be challenging to fit into the overall improvement plans. For future development or renovation proposals involving change of use permits, in the worst case, this could discourage certain existing building improvement projects from going forward.

However, the solid waste code would retain a degree of regulatory flexibility, which means that modified or alternative designs and locations for solid waste storage spaces would be possible for the City to approve, even if there are significant constraints on a given site. Given these factors, it is not likely that significant adverse impacts related to land use or provision of housing would occur.

**3. Revise the minimum width and depth requirements for solid waste storage space, for certain size categories of residential and non-residential uses.**

***Land Use and Housing***

The findings related to these changes in the proposal are similar to the discussion under item #1 above. The effect of the current solid waste proposal on site design would be to result in provision of slightly larger waste storage spaces (by one or two feet in width and depth dimensions) for certain sized developments. This would tend to increase the amount of floor area dedicated to solid waste features on a property. If space is at a premium on fully developed lots, the additional space consumed (either outdoor or indoor, in floor area) could create additional siting challenges to fit all needed uses and features onto a given property. This could result in a need to adjust total floor area dedicated to the development's uses, such as for dwelling units or space usable by the intended occupants of a building.

However, the magnitude of this potential adverse impact is interpreted as minor. Development applicants would be able to continue designing new developments that meet code requirements,

although additional space and architectural design matters would need to be resolved. Also, a degree of regulatory flexibility would continue to be present in the proposed code. Thus, no new potential for significant adverse impacts on land use or provision of housing would be likely.

It should also be recognized that the proposal's adjustment of dimensional minimum requirements would provide a lowered minimum space provision for a certain size category of developments.

- The increase in minimum dimensions of solid waste storage space from 12x12 feet to 14x14 feet would affect development 16 dwelling units or more. So, the category of developments in the 9 - 15 dwelling unit range would have a reduced minimum space provision (compared to the prior code amendment proposal) changing from 12x12 to 8x8 feet, and an increase to from 7x7 to 8x8 feet in the 1 to 8 dwelling unit category.
- Similarly for non-residential uses, the increased dimensional requirements of 14x14 feet would affect non-residential use developments greater than 15,000 gross square feet. So, the category of developments with 5,000 - 15,000 square feet of non-residential uses would have a minimum dimensional requirement of 8x8 feet rather than the prior proposal of 12x12 feet.

The adjustments noted above would result in solid waste storage spaces that would meet the minimum needs for solid waste collection, according to SPU. It would help fine-tune the code requirement to have the larger minimum space dimensions be provided for a well-defined larger category of development.

4. **Define or increase the following minimum width dimensions:**
    a. **A minimum storage area access door width of 6 feet, to allow container movements;**
    b. **A minimum 6-foot width for pathways where dumpsters would be moved; and**
    c. **Increase the minimum width of access routes and gates traversed by collection vehicles, from 10 feet to 12 feet.**

***Land Use and Housing***

Similar to discussions under items #1 and #3 above, stating these proposed adjustments to minimum dimensions of doors, movement pathways, and vehicle access routes would slightly increase the amount of outdoor or indoor space provided for solid waste utility purposes. The reasons for the requirements are to ensure minimum levels of accessibility and movability for solid waste containers as they are transferred from storage to collection locations. This reflects standard practices for safe provision of solid waste services. If space is at a premium on fully developed lots, the additional space consumed (either outdoor or indoor, in floor area) could create additional siting challenges to fit all needed uses and features onto a given property.

This could result in a need to adjust total floor area dedicated to the development's uses, such as for dwelling units or space usable by the intended occupants of a building.

However, the magnitude of this potential adverse impact is interpreted as minor. Development applicants would be able to continue designing new developments that meet code requirements, although additional space and architectural design matters would need to be resolved. Also, a degree of regulatory flexibility would also continue to be present in the proposed code. Thus, no new potential for significant adverse impacts on land use or provision of housing would be likely.

***Transportation***

The proposed increase in minimum width for truck access routes to 12 feet (from 10 feet) could have a bearing on whether solid waste collection vehicles can use alleys to provide solid waste service. This would be determined on a site-by-site basis. The effect of this requirement could have building design implications if solid waste collection locations would need to be placed in different parts of a building, if alleys could not be used. It could also slightly modify building design to the extent that doors used by collection vehicles would need to be slightly wider.

5. **Update one minimum vertical height clearance requirement (16 feet for standard roll-off dumpster service).**

***Land Use and Housing***

The proposal's clarification of a 16-foot minimum height clearance for locations that would have roll-off dumpster service would provide greater clarity in the code. This is meant to alert applicants and designers of this functional need so that it is incorporated into designs sooner, as a way to achieve greater permit review efficiency. Choices for a building to provide roll-off dumpster service may relate to the building's size and amount of occupants, and in relation to the amount of solid waste it is expected to generate. This clarification has no particular potential to generate additional land use or housing impacts; and flexibility provisions would remain in the code to accommodate project-specific adjustments if those would make a difference in development outcomes.

6. **Clarify that details about solid waste containers and storage areas must be shown on building plans.**

***Land Use and Housing***

The proposal clarifies that specific information about solid waste containers and storage areas must be provided on development plans. This would provide greater clarity to applicants and designers, and provide for greater permit review efficiency; this sort of information is already sought during current permit reviews by the City. This has no particular potential to generate additional land use or housing environmental impacts.

*Signature:* *(on file)* *Date:* *February 18 , 2025*

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