



Major Conditional Use Permit (CUP) Staff Report

File Number: CUP 2402-3004

Project Name: Summit View Development

Project Address: 16445 International Boulevard, SeaTac, WA 98188

Parcel Number: 2823049054, 2823049052 and 2823049080

Project Summary: Summit View Development is a two-phase development. The first phase includes site grading (including memorial lawn), utilities, paving and parking improvements. The second phase includes the development of the celebration of life pavilion and Prisoner of War (POW) / Missing in Action (MIA) memorial relocation.

Applicant/Property Owner: BOE architects, PLLC; 1130 Broadway, Suite 207; Tacoma, WA 98402; (253) 383-7762; dboe@boearc.com. / Memorial Park & Washington- Cameron Smock President/CEO 253.242.1787

Agent/Contact: BOE architects, PLLC; 1130 Broadway, Suite 207; Tacoma, WA 98402; (253) 383-7762; dboe@boearc.com.

I. Background

A. Proposal

Summit View Development consists of internal site improvements and additions to Washington Memorial Park, a pre-existing Funeral Home and Cemetery property zoned Park (P). The proposed project will include the construction of a 7,500 square foot Celebration of Life Pavilion, relocation of the existing POW/MIA Memorial, extending site utility infrastructure which includes a fire line extension, electrical service extension, and surface water management. An additional stacked parking arrangement for 62 vehicles, and the creation of a variety of interment memorial options for human remains and cremains. An estimated 1,500 CY cut, and 2,000 CY fill are needed to prepare the site for development.

Due to the major conditional use permit (CUP) application, the city does not require the separate submittal of a preliminary site plan review application and instead reviews the development proposal for compliance with the zoning code as part of the CUP application.

B. Site and Neighborhood

1. Site Description

Site Description: Washington Memorial Park is a 60-acre cemetery which was designed to include the design theme of the Garden Movement to John Claudis Loudon. Landscaping materials are limited in size and location to maintain the open span of the lawns and allow for long-range views across the park. Most of the project scope is in the Summit View Development area. The Summit View Development area is within parcel number 282304-9054. The subject site is centrally located within the Washinton Memorial Park directly west of the existing mausoleums along the main north sound driveway connecting South 160th Street to South 170th Street. There are no critical areas within 200-feet of the proposed Summit View Development.

2. Land Use

The land use for the site and adjacent properties are as follows:

- a. Site: Funeral Home/Crematory
 - b. North: Public/Private Parking.
 - c. South: Right of Way/Utility, Road.
 - d. East: Public/Private Parking and Hotel/Motel and Associated Uses.
 - e. West: Airport and Public/Private Parking.
3. Zoning (Exhibit 4b)
- a. Site: P (Park).
 - b. North: AVO (Aviation Operations).
 - c. South: UL-7,200 (Urban Low Density Residential).
 - d. East: CB (Community Business).
 - e. West: AVO (Aviation Operations).
4. Comprehensive Plan Designations (Exhibit 4c)
- a. Site: P (Park)
 - b. North: AP (Airport)
 - c. South: AP (Airport)
 - d. East: CH (Commercial High Density)
 - e. West: AP (Airport)
5. Utilities, Services
- The utilities and services for the site are as follows:
- a. Water District: Highline Water District #75
 - b. Sewer District: Valley View Sewer District
 - c. School District: Highline School District
 - d. Fire District: Puget Sound Regional Fire Authority

C. Project Timeline

1. Voluntary Pre-application Meeting: May 16, 2023
2. Mandatory Pre-application Meeting: December 11, 2023
3. CUP Application (Exhibit 2a) submitted: February 13, 2024
4. Determination of Completeness (DOC) (Exhibit 5) issued: March 12, 2024
5. Notice of Application (NOA) (Exhibit 6a) issued: March 26, 2024
6. SEPA determination (Exhibit 7) issued by the City of SeaTac: August 5, 2024
7. Public Hearing Notice (Exhibit 6b): September 11, 2024

D. SEPA Review

On March 26, 2024, the City issued a combined Notice of Application (NOA), which included the project's Conditional Use Permit (CUP) and SEPA Checklist review. City issued a Determination of Nonsignificance (DNS) on August 5, 2024. The comment period for the SEPA action ended on August 19, 2024. One comment was submitted during the combined NOA from the Department of Ecology (Exhibit 10). The comment requested the applicant to test for arsenic and lead following the 2019 Tacoma Smelter Plume Guidance. No public comments were filed within the SEPA comment period. The SEPA appeal deadline ended on August 29, 2024. No appeals were filed within the SEPA appeal deadline.

II. Staff Findings

A. Compliance with Zoning Standards

As part of the Conditional Use Permit review, City staff analyzed the proposal for compliance with the applicable development standards of the zoning code. As the tables below illustrate, the proposal complies with the applicable zoning code regulations.

Dimensional Standards (SeaTac Municipal Code (SMC) 15.400.200 for the P Zone)

Standard	Requirement	Proposal	Complies?
Lot area, minimum	N/A	60.72 acres (existing)	N/A (no additional land is being added to the proposal)
Development site area, minimum	N/A	N/A	N/A
Setbacks			
Front, minimum	10'	22'	Yes
Front, maximum	N/A	22'	N/A
Rear, minimum	10'	24'	Yes
Side, minimum	10'	28' (south) – 37'6" (north)	Yes
Building lot coverage, maximum	N/A	15%	N/A
Lot width, minimum	N/A	272'	N/A
Structure height, minimum	N/A	N/A	N/A
Structure height, maximum	N/A	26'	(1) Limited by FAA and Fire Department regulations. Will be reviewed at building permit.

Landscaping Standards (SMC.15.445.210 for Cemetery)

Standard	Requirement	Proposal	Complies?
Street frontage	N/A (due to the project scope)	N/A	N/A
Building façade	5 feet, Type V	5 feet, Type V	Yes

Side/rear yards	N/A	N/A	N/A
Side/rear yards for non-compatible uses	N/A	N/A	N/A
Parking lot	N/A	N/A	N/A

Pursuant to SMC 15.445.200 except for “street frontage landscaping” cemetery land uses do not require landscaping. The “street frontage landscaping” standards do not apply in this situation since the project area street frontage is over 380 linear feet away in all directions from the project site. The applicant is

proposing at minimum a type V/5-foot building façade landscaping buffer. The proposed landscaping buffer is shown within various planters along the new structure (exhibit 3b).

Parking Standards (SMC 15.455 for Cemetery)

Standard	Requirement	Proposal	Complies?
Off-street parking spaces, minimum	1 per 40 sf of chapel area, plus 1 per employee (required $2,300/40 = 57.5 = 58$)	62 (next to new Development) The total parking capacity of the site is approximately 600 plus	Yes
Off-street parking spaces, maximum	N/A	N/A	N/A
Parking space dimension	8.5 feet by 18 feet	8.5 feet by 18 feet	Yes
Bicycle Parking	N/A	N/A	N/A

B. Conditional Use Permit Criteria

Decision criteria for conditional use permits are found under SMC 15.115.020(D). The Applicant’s and Staff’s responses to the criteria are provided below.

1. The proposed use is listed as a conditional use under SMC 15.205.040, Use Chart.
 - a. *Applicant Comment:* Please see the attached excerpt from Section 15.205.040 of the SeaTac Municipal Code where the Use Table designates a Cemetery Land uses an allowed use within a Park Zoning Designation subject to a Conditional Use Permit.
 - b. *Staff Findings:* Pursuant to SMC 15.115.020.B A major Conditional Use Permit (CUP) is required to allow the expansion of an existing, legal conditional use which has previously been permitted within the zone classification. A minor CUP shall not exceed an expansion greater than twenty percent (20 %) of the gross floor area of the existing conditional use. The subject property is located within the Park (P) zoning district. The ‘Cemetery’ land use per SMC 15.205.040 requires a CUP to expand existing cemetery use. The project scope exceeds the 20 % expansion threshold and therefore requires a Major CUP.

2. The site is adequate in size and shape for the proposed project and the use conforms to the general character of the neighborhood.
 - a. *Applicant Comment:* The proposed Summit View Development area will comprise less than 2% of the 60-acre Washington Memorial Park. The proposed use at the Summit View Development area is a continuation of the existing use as a cemetery and funeral home. This continuation of the existing use will not alter the character of the existing neighborhood. (a general character that is defined by the open space of the Washington Memorial Park).
 - b. *Staff Findings:* Washington Memorial Park is comprised of three parcels 282304-9054, 282304-9052 and 282304-9080. According to King County Assessor’s records, parcel 282304-9054 has an area of 2.16 acres, parcel 282304-9052 has an area of 56.31 acres and

parcel 2823049-080 has an area of 2.25 acres. Most of the project scope is located within parcel 282304-9054. Parcel 282304-9054 is a land locked parcel and is centrally located within Washington Memorial Park. The subject parcel is approximately 640 feet away from the most western boundary, 345 feet away from the most eastern boundary, 1380 feet away from the most southern boundary and 1,300 feet away from the most northern boundary of Washington Memorial Park. The site's topography slopes down northwest to southeast approximately 55 feet. The most noticeable portion of the proposed development is the "Celebration of Life Pavilion". The "Celebration of Life Pavilion" is a 7,500 square foot structure. Due to the site topography and proximity to the nearest right-of-way, the development will not be noticeable offsite and will not have a change to the general character of the neighborhood.

3. The unique character of topography, arterial streets and adjacent land use complement the proposed conditional use.
 - a. *Applicant Comment:* The site is generally flat with a gradual slope to 188th street. Based upon the geotechnical report, there are no known surface indications or history of unstable soils in the immediate vicinity. There will be no negative impact to the existing character of the topography, arterial streets, or the adjacent land use complement upon the approval of this conditional use. Since the proposed use is a continuation of the existing use of the Washington Memorial Park and the development is completely within the park, the existing character of the surrounding neighborhood will be maintained.
 - b. *Staff Findings:* As previously stated in the Conditional Use Permit criteria section 2.b. the most noticeable portion of the project scope is the construction of the Celebration of Life Pavilion. Due to the site topography and proximity to the nearest right-of-way, the development will not be noticeable offsite and will not have a change to the general character of the neighborhood. The adjacent land uses are dominated by airport and airport related services, including hospitality, general retail, and public/private parking. The proposed Conditional Use is an existing use which is proposing to expand services. The expansion will have minimal change to the existing neighborhood. The unique character of topography, arterial streets and adjacent land use complement the proposed conditional use
4. The conditional use would not be detrimental to surrounding land use.
 - a. *Applicant Comment:* As the proposed project is a continuation of the existing use as a cemetery and funeral home of the Washington Memorial Park, and the development site is completely within the Washington Memorial Park, granting of a conditional use will not be detrimental to the surrounding land uses.
 - b. *Staff Findings:* Staff agrees with the applicant that the proposed use is a continuation of the pre-existing use, which was established in 1931 and will not be detrimental to surrounding land uses. According to the City's Public Works Engineering Review Division (ERD) review of the submitted Trip Generation and Parking memo the proposal will have no additional pm peak hour traffic increases due to the project's scope. Granting of this conditional use will not be detrimental to the surrounding land uses.
5. Modifications to standards are limited to those which will mitigate impacts in a manner equal to or greater than the standards of this code.

- a. *Applicant Comment:* The only proposed modification to standards is related to the proposed stacked parking configuration adjacent to the Celebration of Life Pavilion. Stacked parking is unique to cemetery operations as it allows for services held within the Washington Memorial Park to have a controlled movement of vehicles through the grounds to the memorial site(s). The proposed stacked parking arrangement allows for vehicles to be screened from view within the Washington Memorial Park as it is to be located between the existing Mausoleums and the proposed new Pavilion (stacked parking is also significantly more efficient for reducing the total area of impervious surfaces within the park setting). The City of SeaTac Zoning Code does not include standards specifically for stacked parking supporting a cemetery use; therefore, the proposed parking utilizes the configuration and dimensional standard found in the SeaTac Zoning code for valet and parallel parking.
 - b. *Staff Findings:* The proposed “stacked parking” is not a defined parking type pursuant to the SMC. City staff believes stacked parking is most like tandem parking. A key component to tandem parking is the use of valet parking. Per SMC 15.455.430 tandem parking is allowed for vehicle rental/sale land use. Tandem parking is also allowed for other land uses upon approval of a valet parking plan. Approval of the valet parking plan is subject to criteria found in SMC 15.455.430.B.1-2. The stacked parking area will not be in public rights-of-way, given its proximity to neighboring use/row it will not create the need for noise control, will not create glare to adjacent properties, will not create a negative impact on adjacent or nearby residential neighborhoods and will be administered by Washington Memorial Park staff. The proposed parking complies with the criteria used to evaluate a valet parking plan. As previously mentioned, the subject site was established in 1931 prior to the of SeaTac incorporation. The proposed parking type is consistent with the existing stacked parking area located near the site’s main entrance off International Boulevard. The stacked parking concept is also consistent with the National Cemetery Administration Design Guide prepared by the U.S. Department of Veteran Affairs dated 2/01/2024. The Design Guide encourages the utilization of cortege services. Typically, when holding a funeral or memorial service, cemeteries utilize a supervised vehicle ‘professional cortege’ within on-site stacked parking locations. The proposed parking type minimizes the required area dedicated to parking while maintaining the maximum amount of open space. City staff concludes the proposed parking type will mitigate impacts in an equal manner to the existing parking types found in SMC.
6. The conditional use is such that pedestrian and vehicular traffic associated with the use will not be hazardous or conflict with existing and anticipated traffic in the neighborhood.
 - a. *Applicant Comment:* As noted previously, the proposed Summit View Development is the continuation of the existing use and not an ‘expansion’ of the funeral home and cemetery use. The Celebration of Life Pavilion is designed to accommodate a wider variety of memorial service options for families – not to increase the number of services to be held within the Memorial Park. Currently there is no location within the Washington Memorial Park to have a catered reception following a memorial service thus service attendees need to travel to an off-site venue to hold such a reception. With the Summit View Development, service attendees can retire to the Celebration of Life Pavilion following a chapel or gravesite service. This use will be a continuation of the existing funeral home and cemetery use and will not be hazardous or conflict with existing traffic in the neighborhood as no increase in traffic will be generated.

- b. *Staff Findings:* The proposed scope will not increase the existing cemetery use. The Celebration of Life Pavilion is designed to accommodate a wider variety of memorial services. The pavilion will consist of a 2,300 square foot main celebration room, an adjacent reception foyer, family parlor, catering kitchen (no cooking equipment) and restrooms and storage spaces. The applicant was directed to provide a Trip Generation Memo prior to the SEPA threshold determination. ERD review of the Trip Generation Memo concluded that the development will not generate any additional pm peak hour trips. The development's proposed hours of operation will be later in the morning starting at 10:00 am or early in the afternoon starting before 2:00 pm. As a condition of approval of this CUP the owner is required to record a deed restriction limiting the proposal's hours of operation to services commencing no later than 2:00 pm.
- 7. The conditional use will be supported by adequate public facilities or services and will not adversely affect public services to the surrounding area unless conditions can be established to mitigate adverse impacts.
 - a. *Applicant Comment:* As noted previously, the proposed Summit View Development is the continuation of the existing use and not an 'expansion' of the funeral home and cemetery use. Public services will not be adversely impacted on the surrounding area by the granting of the conditional use. With the installation of the fire flow line from International Boulevard to the project location, the construction of the Summit View Development will improve the life safety of the Washington Memorial Park.
 - b. *Staff Findings:* Adequate public facilities and services are available to the site water utilities are provided by the Highline District # 75, sewer utilities are provided by the Valley View Sewer District, and emergency services are provided by the Puget Sound Regional Fire Authority. Upgrades to the existing utilities will make the existing Funeral Home, Chapel, and Crematorium safer. Staff have not been made aware of any reasons to believe the use will adversely affect such services.

C. Compliance with Engineering Standard

The City of SeaTac Engineering Review Division is recommending preliminary conceptual approval of the project subject to the conditions of approval included in this staff report.

Traffic Concurrency

The applicant was directed to provide a Trip Generation Memo upon review of the SEPA Checklist. ERD review of the Trip Generation Memo concluded that the development will not generate any additional pm peak hour trips. PM peak hour trips are trips to and from the site that occur from 4-6 pm. The development's proposed hours of operation will be later in the morning (starting at 10:00 AM) or early in the afternoon (starting before 2:00 PM). As a condition of approval of this CUP the owner is required to record a deed restriction limiting the proposal's hours of operation to services commencing no later than 2pm.

Public Comments

- 1) On March 26, 2024, the City issued a combined Notice of Application (NOA), which included the project's Conditional Use Permit (CUP) and SEPA Checklist review. The NOA was published in the Seattle Times on March 26, 2024 (Exhibit 6a). The NOA was also posted on the site and mailed to property owners within 500 feet of the site. The comment period ended on April 9, 2024. One comment was submitted during the combined NOA from the

Department of Ecology (Exhibit 10). The comment requested the applicant to test for arsenic and lead following the 2019 Tacoma Smelter Plume Guidance.

III. Staff Conclusions and Recommendation

Staff concludes that the proposed major conditional use permit and development proposal complies with the applicable development standards and criteria for approval if conditions below are met.

Staff recommends approval of the major conditional use permit subject to the following conditions:

A. Planning Division

1. The Conditional Use Permit approval shall be valid for a period of two (2) years. If a building permit or construction permit application is not made before the expiration of that period, a new Conditional Use Permit application will be required.
2. Site and building development shall substantially conform to the submitted site plan and building elevations.
3. The landscaping details (e.g. species, location, number, size, spacing, legend, notes) and irrigation have not been reviewed with the CUP and will be reviewed at the time of building permit.
4. Prior to building permit issuance, the property owner(s) shall record a deed restriction limiting the proposal's hours of operation to services commencing no later than 2pm.

B. Engineering Division

1. The Applicant shall submit an STE Permit Application to comply with King County Surface Water Design Manual, King County Road Design and Construction Standards, and the City of SeaTac Addendum to King County Surface Water Design Manual, latest editions. It should include:
 - a. Technical Information Report,
 - b. Traffic Impact Analysis (updated for final unit counts and including appendices with Synchro information, particularly for accesses),
 - c. Geotechnical Information Report,
 - d. Bond Quantity Worksheet (for on-site & right-of-way work),
 - e. Recorded Documents (i.e., easements, Utility Availability, Access, ROW dedication documentation, etc.),
 - f. Declaration of Covenant for all stormwater facilities,
 - g. Frontage improvements,
 - h. Traffic Control Plans to meet the minimum requirements of the Manual on Uniform Traffic Control Devices, latest edition.
2. The Applicant shall submit a Right-Of-Way Permit Application complying with the latest edition of the King County Road Design and Construction Standards for all work performed within the City's Right-of-Way.
3. The developer may be required to submit a Haul Permit per SMC 11.10.080.D and RCW 70.105.010, and RCW 43.200.015 prior to site grading activities.

Prepared by: Ramon Rodriguez, *Senior Planner*

Prepared on: 09/18/2024

Exhibits List:

1. Staff Report, dated September 18, 2024
2. Application Materials
 - a. Applicant's Project Narrative, received February 13, 2024
 - b. Applicant's response to Criteria of Approval, received February 13, 2024
 - c. Trip Generation and Parking Momo conducted by Heath and Associates dated June 8, 2024
3. Plan Set, submitted February 13, 2024
 - a. Architectural
 - b. Landscape
 - c. Site plan (revised on June 10, 2024)
 - d. Fire Main Extension Exhibit
 - e. Site survey
4. Zoning/Comprehensive Plan Information
 - a. Vicinity Map
 - b. Zoning Map
 - c. Comprehensive Plan Land Use Map
5. Determination of Completeness (DOC), issued March 12, 2024
6. Public Notices
 - a. Notice of Application (NOA), issued March 26, 2024
 - b. Public Hearing Notice, issued September 11, 2024
7. Summit View Development SEPA DNS, issued August 5, 2024
8. Geotechnical Report conducted by Terra Associates, Inc. dated April 26, 2023
9. National Cemetery Administration design guide dated February 1, 2024
10. State of Washington Department of Ecology project comment letter dated April 9, 2024
11. John Claudis London and The Garden Cemetery Movement