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# City of Seattle Seattle Planning Commission

September 26, 2013

Diane Sugimura, Director

Department of Planning and Development

700 5<sup>th</sup> Ave. Ste. 2000

Seattle, WA 98104

Re: Commission comments on University Districts EIS Scoping

Dear Ms. Sugimura,

The Seattle Planning Commission appreciates the opportunity to provide feedback to the Department of Planning and Development (DPD) on the advancement of the University District (U District) Environmental Impact Statement (EIS) process. Commissioner Matt Roewe participated on the advisory group and both he and staff in DPD have provided the Seattle Planning Commission (SPC) with updates on the U District Urban Design Framework (UDF) process.

We understand that DPD has had a thoughtful community engagement program that revealed that University District residents' and business owners' value a vibrant and safe neighborhood; a thriving business district and community open spaces. We also understand that this community is embracing the U District light rail station as a catalyst for new investment. Desired investments will develop more housing for permanent and student residents, as well as places for public and private-sector employment to grow in association with innovation and research at the University of Washington. It is our understanding that this community would welcome more intensive, high-rise development to accommodate new housing and employment. Therefore, the SPC would suggest strategic increases in density on the limited infill opportunity sites available in order to accomplish the neighborhood vision.

We commend you and your staff on the great work done first on the University District Urban Design Framework and on the recently released draft alternatives for EIS scoping. In the draft alternatives, we are pleased to see that each alternative is based on achieving the same growth targets for households and jobs. This common starting point will best demonstrate the clear differences between the alternatives and begin a more robust conversation about how to accommodate the expected growth.

After review of the draft alternatives we have a few recommendations.

# Increased density on "The Ave" needs consideration of current character

The business district along University Way NE (The Ave) deserves some additional consideration in its planning because of the many small scale storefronts and local retailers. We would recommend adopting an approach similar to the preservation program used in the Pike/Pine Overlay area as appropriate on The Ave. When considering increased building heights and potential increases in Floor Area Ratio along University Way NE as in Alternative #1, we recommend further study of ways to encourage implementing new through-block crossings as an attractive incentive related to increased development.

# • An Innovation Zone will require flexibility

As the University of Washington continues to envision a new "Innovation Zone" along I-5, we recommend applying the Seattle Mixed (SM) zoning rather than just low-rise (LR) zones. Expanding the SM zoning could have the benefit of community continuity and provide increased flexibility for future development. SM zoning would build upon the University's influence and momentum in the Southwest Campus Major Institution Overlay area.

## Alternatives should include building heights up to 340' and 420'

In our initial comments (March 15, 2013) to DPD on the Urban Design Framework, we recommended that increased building heights be studied through the EIS.

"Due to building codes, 240' is a break point for structural and infrastructure costs. Any height limit between 240' and 300' is more financially challenging. A building height of 340' to 420' has better development economics and is more likely to be constructed. (SPC 3/15/2013)

In the current EIS, the maximum building height remains at 300'. The EIS is a great opportunity to gauge public support for an increase in the allowable building height in certain areas and we urge DPD to include analysis of 340' and 420' building heights. In order to have a full conversation of trade offs and public benefits the community should engage in a dialogue that includes a significant high-rise option as an alternative to the typical 7 story (five over two) projects that often provide little or no public benefits. The few remaining development opportunities in this district should be leveraged to create significant jobs and housing, more vibrancy, more public benefits, improved investment potential and an increased tax base. Taller buildings and greater development intensity are appropriate in a light rail station area and, based on our understanding of community sentiment, would be welcomed by the stakeholders.

We would also caution that even with 300' height limits developers often only pursue 240' (VIA 6 and The Martin projects in The Denny Triangle). A building above 240' triggers the need to either utilize a structural dual moment frame or a peer-review process. Both heights increase the expense and time of a project and developers will likely require more than a 60' incentive. The height economics and aesthetics are also relative to floor plate size and tower spacing. 300' heights may work economically in a building that has a large floor plate of 15,000 SF or more, but generally the city has established limits on residential tower floor plates around 10,700 SF per floor with minimum tower spacing of 60' to 80'. We concur that these new city standards would be appropriate to consider in the U District.

This floor plate and height issue is also further complicated by use. Office tower buildings should also be encouraged as part of the increased employment strategy. Office tower floor plates up to 24,000 square feet could be appropriate here, but in consideration of bulk, the building height should be limited to 125' to 160' feet. The EIS process should explore these variables and options further to help determine the best fit for this neighborhood.

## Alternatives should include a change to existing LR2 zoning on Roosevelt Avenue

Along Roosevelt Way NE between the University District and Ravenna there exists an island of LR2 zoning, between the blocks of NE 56<sup>th</sup> Street and NE 59<sup>th</sup> Street. We recommend including for further study, zoning changes to this island - considering LR3 or NC 40 zoning as options. Roosevelt Way NE is an important transit corridor and these parcels are mere blocks from the U District light rail station as

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well as the Roosevelt Station. To not study this LR2 island for increased density would be a missed

opportunity.

Additional community open space necessary

As stated in our comments on the Urban Design Framework, we are concerned with the current

amount of open space within the University District neighborhood. Open space becomes even more

critical as projected growth becomes a reality for this neighborhood. We are encouraged that DPD is

currently evaluating tools to increase the amount of open space in the neighborhood and hopeful that

these tools will include both public and private financing. We recommend the amount and quality of

open space be clearly identified within the EIS.

Metro Bus Coordination Related to Proposed Street Car/Light Rail and ROW Utilization

We continue to encourage King County Metro to advance planning for bus integration at the light rail

station, as well as SDOT and the potential street car expansion. Integrated bus transit with fixed rail is

a significant determinant of transit access and ridership. Additionally, bus stops and layover locations

greatly influence land development decisions and place making opportunities, particularly in the south

part of the study area. Transit has and will continue to play an ever increasing role in the formation of

this neighborhood. It is imperative that the City in its planning processes continue to push Metro on

these important issues. Separately, we encourage SDOT to pursue the design and development of a

streetcar to serve the neighborhood.

Thank you for the opportunity to provide you with our recommendations on the University District EIS

scoping. We are available to answer any questions and would be happy to discuss all of our

recommendations in more detail. Feel free to contact me or Planning Commission staff, Jesseca Brand

at (206) 684-8694.

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Sincerely,

**David Cutler** 

**Seattle Planning Commission Co-Chair** 

Amalia Leighton

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Seattle Planning Commission Co-Chair

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CC: Mayor Michael McGinn;

Seattle City Councilmembers;

Darryl Smith, Ethan Raup, Alison Van Gorp; Mayor's Office;

Marshall Foster, John Skelton, Susan McLain, Dave LaClergue, DPD;

Sara Belz, Central Staff

## **SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURES & RECUSALS:**

- -Commissioner Morgan Shook disclosed that his employer, Berk Consulting, is working on the University District Environmental Impact Statement.
- Commissioner Matt Roewe disclosed that his employer, VIA Architects, works on projects throughout the city of Seattle that may be impacted.
- Commissioner Colie Hough Beck disclosed that her firm, HBB, works on projects throughout the city of Seattle that may be impacted.
- Commissioner Catherine Benotto disclosed that her employer, Weber Thompson, works on projects throughout the city of Seattle that may be affected.
- Commissioner Amalia Leighton disclosed that her employer, SvR, works on projects throughout the city of Seattle that may be affected.
- Commissioner Dave Cutler disclosed that his employer, GGLO, works on projects throughout the city of Seattle that may be affected.
- Commissioner Josh Brower disclosed that his firm, Veris Law Group PLLC, represents developers throughout the city of Seattle that could be impacted.
- Commissioner Brad Khouri disclosed that his firm, b9 Architects, works on projects throughout the city of Seattle that may be impacted.
- Commissioner Grace Kim disclosed that her firm, Schemata Workshop, is working with the University of Washington and Sound Transit on Multi-family projects that may be affected.