

NORTHGATE URBAN CENTER REZONE

Final Environmental Impact Statement

Prepared for:
City of Seattle

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FACT SHEET

NAME OF PROPOSAL

Northgate Urban Center Rezone

PROPONENT

City of Seattle

PROJECT DESCRIPTION

The EIS evaluates a range of alternatives that could modify the zoning for some properties within a portion of the Northgate Urban Center, identified as the study area, located in Seattle, Washington, to allow more intensive residential and commercial land uses. Rezoning could occur either through legislative area-wide action (Alternatives 1 and 2) or through individual contract rezones of individual properties (Alternative 3). Other potential related actions that could apply to any alternative include possible Seattle Comprehensive Plan amendments; Northgate Overlay District amendments within the Seattle Municipal Code (SMC) Title 23 (Land Use Code); new guidelines for the right-of-way improvements manual; and amended Northgate-specific design review guidelines.

The EIS is programmatic or non-project in nature and is focused on the broad impacts associated with the rezone alternatives. Additional environmental review would occur in the future, if deemed necessary, in conjunction with review of site-specific project proposals, and/or in connection with revisions to standards, guidelines or administrative programs.

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PENDING APPLICATIONS

- DPD has submitted an application to amend the Seattle Comprehensive Plan to express support for future rezones in the Northgate Urban Center.

GOVERNMENTAL ACTIONS

The actions associated with the rezone alternatives could include a legislative rezone of the study area by the City Council (Alternatives 1 and 2), or individual site-specific (e.g., contract) rezone proposals to implement increases in height and intensity on lands within the study area (Alternative 3). Other potential related actions described in the EIS include proposed Seattle Comprehensive Plan amendments; legislative amendments to the text of the Northgate Overlay District (in SMC Title 23), including incentive zoning provisions; amended Northgate-specific Design Guidelines applicable to Northgate; and potential additions to SDOT's right-of-way improvements manual. Legislative actions will be considered by the Seattle City Council.

This proposal would not approve any specific projects for construction. Individual projects would require separate review and approval under the requirements of the Seattle Municipal Code and other applicable regulations.

AUTHORS AND PRINCIPAL CONTRIBUTORS

This EIS has been prepared under the direction of the Seattle Department of Planning and Development (DPD). Research and analysis were provided by:

Weinman Consulting, LLC: EIS project management and coordination, and land use policy analysis

ESA Adolfson: Analysis of land use, housing, recreation, aesthetics, water, and plants and animals; EIS document production.

Fehr & Peers/Mirai: Transportation

Geomatrix: Air quality

Hewitt Architects and Mithun Architects: Urban design

LOCATION OF BACKGROUND DATA

Department of Planning and Development
700 Fifth Avenue, Suite 2000
Seattle, WA 98124-4019

DATE OF ISSUE

December 21, 2009

EXPECTED DATE OF IMPLEMENTATION

Action by the City Council could occur in 2010.

AVAILABILITY OF THE DRAFT EIS

Copies of the EIS and/or Notices of Availability have been distributed to a number of agencies, organizations, and individuals as noted in the Distribution List located in Chapter 5.

Copies of the Final EIS are available for review at the DPD Public Resource Center located in Suite 2000 of the Seattle Municipal Tower in downtown Seattle (700 Fifth Avenue). Copies of the EIS are also available at the following public libraries:

Seattle Public Library - Central Branch, Northgate Branch, Lake City Branch, Northeast Branch.

Supporting documentation is also available for review at the DPD Public Resource Center.

Copies of the Final EIS may be purchased for the cost of reproduction. Copies on CD can also be made available. In addition, a copy of the document is available on the DPD web page at http://www.seattle.gov/DPD/Planning/Northgate_Revitalization/Overview/.

CHAPTER 1 SUMMARY

1.1 Project Identification

The City of Seattle is evaluating options for rezoning properties within a portion of the Northgate Urban Center referred to as the “study area.” The study area includes a portion of the Northgate Urban Center that extends along and adjacent to Northgate Way and is generally bounded by Meridian Ave. N and Burke Ave. N on the west; 12th Ave. NE (including a parcel along Pinehurst Way NE and 115th Street) on the east; approximately NE 114th Street on the north; and NE 107th Street (excluding the Northgate mall) on the south.

The Proposed Action could result in a change in zoning, either through legislative action or individual contract rezones, of up to 98 acres of land in the Northgate area of Seattle, Washington, to allow more intensive residential and commercial land uses. Related actions would include amending the City’s Zoning Map for properties within the study area.

Implementation could also involve a combination of other legislative and administrative actions. Potential related but independent implementation actions for any of the alternatives include amendments to the Northgate Overlay District (SMC 23.71), the addition of new incentive zoning provisions specific to Northgate, and amendments to Northgate-specific Design Review guidelines. In addition, the City Council could independently amend Seattle’s Comprehensive Plan policies to express support for possible rezones. Potential administrative actions include the addition of new guidelines for SDOT’s right-of-way improvements manual.

1.2 Background

The Northgate neighborhood includes one of six Urban Centers identified in the City of Seattle Comprehensive Plan (2005). Urban Centers provide a diverse mix of housing and employment land uses and are planned to be the most intensively developed neighborhoods in the city. A significant portion of the City’s and region’s forecast 20-year population (58 percent) is targeted for designated Urban Centers.

For the decade after designation of the Northgate Urban Center, development in the Urban Center did not keep pace with the targeted growth rates for either employment or housing. Until recently, the Northgate Urban Center lagged behind other Urban Centers in terms of job growth. In 2003 the City adopted Resolution 30642 to “accomplish future steps for Northgate [including] economic development efforts, multi-family housing incentives, multi-modal transportation, pedestrian and open space improvements, integrated natural drainage strategies, sustainable design and green building, public art, planning for major commercial and multi-family residential development, and meaningful community involvement in these actions.” These steps have led to numerous new public and private development projects that are revitalizing the Northgate Urban Center. The City wants to ensure that recent momentum is sustained, that growth can be accommodated, and to achieve the overarching goal of the Northgate Area Comprehensive Plan (NACP), which is to “transform an auto-oriented landscape to a pedestrian friendly destination with densities to support transit.”

The NACP is adopted into the City's Comprehensive Plan (see webpage http://www.seattle.gov/DPD/static/Northgate%20Neighborhood%20Planning%20Element_LatestReleased_DPDP_020184.pdf).

1.3 Project Objectives

The overall objectives of possible rezones and other possible related actions include the following:

- Implement the City of Seattle Comprehensive Plan's goals for Urban Centers;
- Implement the vision of the Northgate community expressed in the Comprehensive Plan;
- Use public investments efficiently in service of City policy goals and the community's vision;
- Maintain the transportation system consistent with the Northgate Coordinated Transportation Investment Plan (CTIP);
- Achieve an attractive urban form through height transitions and pedestrian orientation;
- Focus additional growth, and leverage the development opportunities presented by several private parcels located along the Northgate Way corridor and the future City park located at 5th Avenue and 112th Street; and
- Incorporate zoning bonus provisions that would apply to rezones.

1.4 Summary of Alternatives Considered

The EIS considers three rezone alternatives in addition to the No Action Alternative:

- Alternative 1 - Broad Rezone
- Alternative 2 - Focused Rezone Alternative
- Alternative 3 – Urban Design Framework

Alternative 3 was developed as a result of additional planning and analysis by City Staff following publication of the Draft EIS, as well as ongoing discussions with stakeholders and neighborhood residents.

Table 1-1 below summarizes the growth associated with each alternative. The rezone alternatives (Alternatives 1, 2 and 3) all assume that growth in the study area to 2030 will attract, focus, and possibly accelerate an increment of growth to the Northgate Way corridor from the broader Northgate planning area. The analysis of the alternatives also considers the possibility that growth greater than forecast could occur in Northgate, which could require adjustment of the Urban Center's growth targets and additional investments in transportation and other infrastructure.

Table 1-1. Estimated Growth for Rezone Alternatives

<i>Alternative</i>	<i>Total New Residential Units within the study area</i>	<i>Net Increase in Residential Units over the No Action Alternative Due to Rezone</i>	<i>Total Capacity for new Commercial Floor Area within the study area (square feet)</i>	<i>Net Increase in Commercial Floor Area over the No Action Alternative Due to Rezone (square feet)</i>	<i>Total Job Growth</i>
No Action	2,362	--	324,104	--	858
1.A Broad Rezone – Residential Focus	4,064	1,702	1,023,737	699,633	2,711
1.B Broad Rezone – Commercial Focus	919	-1,433	3,946,647	3,622,543	10,453
2 Focused Rezone	3,431	1,069	818,321	494,216	2,167
3 Urban Design Framework	4,189	1,827	954,443	630,339	2,528

Note: All numbers shown in Table 1-1 reflect the potential net increase in jobs or housing, taking into account the housing or business uses that would be replaced with new development. The table has been updated since the Draft EIS to reflect minor corrections to calculations. The magnitude of changes is small and does not affect the conclusions of the Draft EIS.

1.4.1 No Action Alternative

Under the No Action Alternative, neither legislative nor site-specific rezone (e.g., contract rezone) are assumed to occur and existing zoning would be retained. Development under the No Action Alternative would include a mix of housing and jobs. Growth would be relatively more dispersed, and may or may not be focused along Northgate Way. The rate and amount of growth is assumed to continue per recent trends and would be consistent with Comprehensive Plan assumptions. Future development proposals for the large “opportunity parcels” identified in the Urban Center could possibly go forward accompanied by contract rezone proposals, which could eventually lead to achievement of higher development intensities. However, the EIS No Action Alternative considers only what is allowed under current zoning.

1.4.2 Alternative 1- Broad Rezone

Under Alternative 1, most properties within the study area would be rezoned by legislative action to the next, more intensive zoning classification. For example, Neighborhood Commercial 3 zoned properties with a 65-foot height limit (NC3-65) would be rezoned to include an 85-foot height limit (NC3-85); and Midrise (MR) zoned properties would be rezoned to NC3 -65 or NC3-85, which would broaden the range of permitted uses and provide the potential for more retail activity in mixed-use buildings. Exceptions to this general approach include a maximum height of 125 feet on a portion of a property currently zoned MR-60, and NC3-85 zoning on a parcel currently zoned L-4 adjacent to the north of the proposed park. No change of zoning

would occur on publicly-owned park sites. See the project description and alternative zoning maps in Chapter 2 for greater detail.

To estimate the range of development that is possible in zones that allow mixed-use development, the Broad Rezone Alternative includes two different land use scenarios – one emphasizing housing, and the other emphasizing commercial development. The residential focus scenario (Scenario A) assumes that mixed-use properties are 75 percent developed for residential use and 25 percent for commercial use, while the commercial focus scenario (Scenario B) assumes 20 percent residential development and 80 percent commercial (60 percent office, 20 percent retail). The Broad Rezone Alternative could include other uses, including new or expanded hotel uses, restaurants, or entertainment uses, but the combination office and retail would generally be expected to contribute more traffic to the peak hour period than other commercial uses, and was therefore used for the traffic analysis.

1.4.3 Alternative 2 - Focused Rezone

Under Alternative 2, properties within the study area would also be rezoned to the next, more intensive zoning classification but the rezones would occur in a more focused area, based on traffic considerations and on the boundaries for Urban Centers designated in the Comprehensive Plan.

Under Alternative 2, properties west of the I-5 freeway and east of Roosevelt Way NE would not be rezoned, and the only Lowrise-zoned properties to be rezoned are those adjacent to the proposed park. The maximum height of structures allowed in any of the rezoned areas would be 85 feet. See the project description and proposed zoning map in Chapter 2 for full details on proposed zoning under this alternative.

1.4.4 Alternative 3 – Urban Design Framework

Under Alternative 3, developed since the Draft EIS was published, a set of rezones could be implemented through subsequent “contract rezone” proposals submitted separately by private property owners and developers. This alternative would establish intensity and height limits for potential rezoning; these limits could be documented using the zoning map in the Final EIS, and/or established pursuant to an ordinance adopted by the City Council. The existing incentive zoning program (SMC 23.58A), which provides a bonus program for projects greater than 85 feet in height, would be referenced by Land Use Code changes to the Overlay District (SMC 23.71) to be proposed at a later date, and assumed to apply to possible future individual rezone actions. The rezone area for Alternative 3 is smaller than Alternative 1 but larger than Alternative 2.

The potential zoning designations that could be achieved through contract rezones under Alternative 3 would allow taller and more intensive buildings on properties in the central portion of the study area between I-5 and Roosevelt Way NE compared to the other alternatives. However, L-2 and L-3 zoned parcels at the edges of the study area would not be rezoned; this is intended to create a buffer and transition to existing single family residential neighborhoods on the border of the Urban Center.

1.4.5 Related Implementation Actions

Several other implementation programs are being developed to accomplish a number of objectives in Northgate: to mitigate the effects of additional height and intensity that would occur as a result of rezoning; to accomplish key physical improvements in the Northgate Urban Center; and to help implement the broader goals of Northgate neighborhood plan policies. Examples include enhanced streets; expanded pedestrian and bicycle networks; additional open spaces and improved streetscapes; and expanded affordable housing opportunities. Most of these strategies would apply to any of the EIS alternatives, whether rezoning occurs through legislative action or contract rezones, as well as to the No Action Alternative. The related implementation actions include the following:

- *Comprehensive Plan Amendment.* One Comprehensive Plan policy would be amended and one policy added to express support for future rezones as a means to achieve Northgate objectives.
- *Northgate Overlay District (SMC 23.71).* Incentive zoning provisions specific to Northgate would be proposed consistent with the program established in SMC 23.58A. In addition to a bonus for the provision of affordable housing, additional components of a bonus program for Northgate could include mid-block pedestrian promenades, enhanced pedestrian amenities, bicycle improvements, public plazas, childcare facilities and sustainability features. Also, other revisions to development standards, and authorization of an open space fund, could occur with amendments to SMC 23.71.
- *Northgate Design Guidelines.* New and amended design guidelines for Northgate would address topics such as pedestrian connections across private property, transit-friendly improvements, bicycle infrastructure, and compatibility of future development on properties with edges adjacent to Hubbard Homestead Park.
- *SDOT Right-of-Way Improvements Manual.* The manual would be amended by administrative action to include guidance for streetscape improvements, including the 3rd Avenue NE Green Street and potential 8th Avenue NE Green Street.

These regulatory and administrative actions will be proposed independent of the Northgate rezones and they are not part of the proposal. In part, they are intended to address the effects of growth in the Urban Center and constitute mitigation measures.

1.5 Elements of the Environment

The following elements of the environment are evaluated in the EIS.

- Air Quality
- Water
- Plants and Animals
- Land Use
- Housing
- Height/Bulk/Scale (See Aesthetics section of the EIS)

- Public View Protection (See Aesthetics section of the EIS)
- Shadows on Open Spaces (See Aesthetics section of the EIS)
- Transportation
- Parks and Recreation

1.6 Summary of Impacts

The analysis in this EIS is programmatic or non-project in nature, and evaluates area-wide impacts at a general level. The City is following a course of phased environmental review for actions in Northgate, pursuant to the provisions of WAC 197-11-060(5) and SMC 25.05.060.E. Future non-exempt development proposals will also undergo site-specific environmental review as required by the State Environmental Policy Act (SEPA).

Table 1-2, which follows, summarizes the identified potential adverse environmental impacts associated with the various alternatives. Please refer to the Draft EIS and Chapter 3 of this Final EIS for further information about these impacts.

Table 1-2. Summary of Environmental Impacts

<i>Element of Environment</i>	<i>No Action Alternative</i>	<i>Alternative 1 Scenario A: Broad Rezone-Residential Focus</i>	<i>Alternative 1 Scenario B: Broad Rezone-Commercial Focus</i>	<i>Alternative 2 Focused Rezone</i>	<i>Alternative 3 Urban Design Framework</i>
Land Use	<p>Under existing zoning, there would be a potential net increase in housing of 2,362 units, and an increase 324,000 sq. ft., commercial uses (a net increase of 858 jobs) within the rezone study area. This amount of growth would accommodate all of the Urban Center’s housing target through 2024 and represents approximately 24 percent of the employment target. Because no rezones are involved, the Proposed Incentive Zoning Program would not be triggered; relatively less housing affordable to median income households would likely be produced.</p> <p>Without rezoning, development would be relatively more dispersed through the Northgate area and less concentrated in the Urban Center. Development impacts would be similarly dispersed.</p> <p>The Urban Center would maintain an auto-oriented character and would continue to be dominated by low-density retail uses and its region-serving orientation. Some incremental intensification of density and greater diversification of land uses would occur. Greatest change could occur in Sub-Area D due to the large difference between the intensity of existing uses and the level of development allowed under existing zoning.</p> <p>Minor land use conflicts – such as emission of noise or odors, or contrasts in building scale -- could occur between uses of different type or intensity, such as in mixed-use buildings, abutting the new park, or where the Urban Center abuts lower density residential neighborhoods. Existing zoning generally incorporates transitions – development scale and intensity steps down from the center to the edges. These impacts are not expected to be significant.</p>	<p>Second largest potential net increase in housing units (4,064 units), which would surpass the Urban Center’s housing target. Net increase of 1.024 mil. sq. ft commercial uses (a net increase of 2,711 jobs).</p> <p>Growth would be more concentrated along Northgate Way in the Urban Center core, and relatively less growth would likely occur outside the Urban Center.</p> <p>If the rezone is successful at stimulating and focusing growth within the Urban Center, growth could exceed the Comprehensive Plan’s residential growth target.</p> <p>The greatest change in amount and type of growth would occur in Sub-Areas B and D, which would be more intensively developed with a mix of uses, rather than being dominated by moderate density residential development (Subarea B) and low density retail (Subarea D).</p> <p>The Urban Center would develop a more residential character. There could be greater demand for neighborhood-serving goods and services that meet everyday needs of a larger resident population. The proposed incentive zoning program could ensure that a portion of new housing is affordable to low and moderate income households.</p> <p>Minor land use conflicts – such as emission of noise or odors, or contrasts in building scale -- could occur between uses of different type or intensity, such as in mixed-use buildings, abutting the new park, or where the Urban Center abuts lower density residential neighborhoods. These impacts are not considered significant. Proposed rezoning generally incorporates transitions – development scale and intensity steps down from the center to the edges; impacts are not expected to be significant. Future development proposals within Sub-Area C, adjacent to the new park, would need to</p>	<p>Largest potential net increase in new commercial uses (3.9 mil. sq. ft) and jobs (10,500), which is nearly 2.5 times the Urban Center job growth target. Smallest potential net increase in housing (919 units), well below Northgate’s housing target.</p> <p>As with the other rezone alternatives, growth would be more concentrated along Northgate Way in the Urban Center core, and relatively less growth would likely occur outside the Urban Center.</p> <p>If the rezone is successful at stimulating and focusing growth within the Urban Center, job growth could exceed the Comprehensive Plan’s existing target.</p> <p>The greatest increase in capacity, and greatest change from redevelopment, would occur in Sub-Areas D and B. The large amount of commercial capacity could decrease demand in other portions of the City; conversely, it would be inconsistent with recent market trends in Northgate.</p> <p>The Urban Center would continue to be dominated by commercial uses. The incentive zoning program could help provide some affordable housing.</p> <p>There would be relatively greater potential for land use conflicts between commercial redevelopment and existing single family neighborhoods, particularly in the northern portion of Sub-Area D. Also, some potential conflicts could occur to the new park in Sub-Area C because of increased traffic. These are not considered significant.</p>	<p>Smaller net increase in housing than Alternative 1A (3,431), but greater than No Action; would surpass Northgate’s housing growth target. Increase in commercial uses of 818,000 sq. ft. (2,200 new jobs) about 54% of the Urban Center’s job growth target. Smaller, more compact rezone area (excludes Sub-Areas A and E).</p> <p>As with the other rezone alternatives, growth would be more concentrated along Northgate Way in the Urban Center core, and relatively less growth could occur outside the Urban Center.</p> <p>If the rezone is successful at stimulating and focusing more growth within the Urban Center, housing and job growth levels could exceed the Comprehensive Plan’s existing targets.</p> <p>There is potential for land use conflicts in Sub-Area B, adjacent to the park similar to that described for Alternative 1.</p> <p>The greatest land use change could occur in Sub-Area D, similar to that identified for Alternative 1A. There would be reduced potential for conflicts with new park, and at the transition with existing residential neighborhoods.</p>	<p>Largest potential net increase in housing units (4,120 units), which would surpass the Urban Center’s housing target. Net increase of 954,000. sq. ft commercial uses (a net increase of 2,528 jobs) about 62% of the Urban Center’s job growth target</p> <p>As with the other development alternatives growth would be more concentrated along Northgate Way in the Urban Center core, and relatively less growth would likely occur outside the Urban Center.</p> <p>If the rezone is successful at stimulating and focusing growth within the Urban Center, growth could exceed the Comprehensive Plan’s residential growth target.</p> <p>The greatest change in amount and type of growth would occur in Subareas A, B and D, which would be more intensively developed with a mix of uses, rather than being dominated by moderate density residential development (Subarea B) and low density retail (Subareas A and D).</p> <p>The Urban Center would develop a more residential character, similar to Alternative 1A. Because proposed heights are higher and on fewer properties, Alternative 3 could result in more projects participating in incentive zoning.</p> <p>There is potential for land use conflicts in Subarea B, adjacent to the park similar to that described for Alternative 1. These conflicts are not considered significant.</p> <p>Proposed heights generally provide transitions – development scale and intensity steps down from the center to the edges; impacts are not expected to be significant. Review of future development proposals within Subarea C, adjacent to the new park, would address potential conflicts related to setbacks and/or access.</p>

<i>Element of Environment</i>	<i>No Action Alternative</i>	<i>Alternative 1 Scenario A: Broad Rezone-Residential Focus</i>	<i>Alternative 1 Scenario B: Broad Rezone-Commercial Focus</i>	<i>Alternative 2 Focused Rezone</i>	<i>Alternative 3 Urban Design Framework</i>
		address potential conflicts related to setbacks and/or access.			
Housing	<p>Approximately 306 existing housing units in the area, some of which are considered affordable to moderate income workers, could be redeveloped with commercial and/or residential uses based on current zoning.</p> <p>Because no rezones are involved, the Proposed Incentive Zoning Program would not be triggered so there would less incentive for the creation of housing affordable to median income households. Rents for existing development could continue to rise as demand for housing increases relative to the available supply. Increasing market rents would erode housing affordability over time.</p>	<p>Approximately 403 existing housing units would likely be replaced with new development.</p> <p>Potential positive impacts:</p> <p>New development could include a net increase of approximately 4,064 housing units.</p> <p>Based on comparison to Downtown incentive zoning, the proposed Incentive Zoning Program could result in development of up to 190 housing units affordable to moderate income workers.</p>	<p>Approximately 403 existing housing units, would likely be replaced with new development.</p> <p>Potential positive impacts:</p> <p>New development could include a net increase of approximately 919 housing units.</p> <p>Based on comparison to Downtown incentive zoning, the proposed Incentive Zoning Program could result in development of up to 415 housing units affordable to moderate income workers. (This large number of affordable units is due to the high estimate of commercial space that would be allowed by the rezones.)</p>	<p>Approximately 306 existing housing units, would likely be replaced with new development.</p> <p>Potential positive impacts:</p> <p>New development could include a net increase of approximately 3,431 housing units.</p> <p>Based on comparison to Downtown incentive zoning, the proposed Incentive Zoning Program could result in development of up to 125 housing units affordable to moderate income workers.</p>	<p>Approximately 306 existing housing units would likely be replaced with new development.</p> <p>Potential positive impacts:</p> <p>New development could include a net increase of approximately 4,189 housing units.</p> <p>Based on comparison to Downtown incentive zoning, the proposed Incentive Zoning Program could result in development of up to 171 housing units affordable to moderate income workers.</p>
Aesthetics	<p>The scale of development could increase substantially as compared to existing development. Development would generally increase in scale incrementally from the north edge of the rezone study area southward, with the tallest structures allowed being 65 feet in height along Northgate Way. There would be no impacts on any protected scenic views.</p> <p>New development could be as tall as 60 feet adjacent to the proposed park between 3rd Avenue NE and 5th Avenue NE and could cast shadows on the proposed park in the late evening hours.</p> <p>No impacts would occur to any protected scenic views.</p>	<p>The potential height of development under this alternative would increase throughout the rezone study area, with the greatest increases being along Northgate Way and along the east side of 1st Avenue NE, where allowable heights would increase by 20 to 60 feet. The tallest structures (up to 125 feet) would be allowed adjacent the freeway, and heights along Northgate Way would be allowed to rise to 85 feet. Height would still increase incrementally from the north side of the rezone study area toward the south, but the increments in height from zone to zone would be somewhat larger than under existing zoning.</p> <p>This alternative would also allow 85-foot tall buildings adjacent to the proposed park, potentially increasing shadows in the evening hours.</p> <p>No impacts would occur to any protected scenic views.</p>	<p>The impacts of this alternative would be similar to those of Alternative 1A except that the area would be more commercial in character. Commercial buildings can have greater bulk due to the fact that they do not have the same light and air requirements as residential buildings.</p> <p>No impacts would occur to any protected scenic views.</p>	<p>The impacts of this alternative would be similar to those of Alternative 1A from 1st Avenue NE to 8th Avenue NE, except that the maximum height of buildings in Subarea B would be 85 feet instead of 125. The height of structures to the north of the proposed park would be 65 feet, roughly the same as the existing building on the south side of the park site.</p> <p>In Subarea A and E, and in Subarea D east of 8th Avenue NE, the impacts would be the same as under the No Action Alternative.</p> <p>No impacts would occur to any protected scenic views.</p>	<p>The impacts of Alternative 3 would be similar to those of Alternative 1A at the street level, with new buildings built to the property lines in most commercial zones. Fewer properties would be rezoned than under Alternative 1, but buildings allowed would generally be taller than in any of the other alternatives, ranging up to 160 feet in height.</p> <p>In subareas A and D, 125' heights would be allowed adjacent to L-3 zones where the height allowed is 35'; and in Subarea B, 160' heights would be allowed next to existing structures that are approximately 60' in height. In these areas, zone transitions could be made more graduated through design review of specific projects, for example, by limiting the shape and location of towers and by providing mid-block open space.</p> <p>Afternoon shadow impacts on the new park in Subarea C would be somewhat greater under Alternative 3, but impacts could be reduced through design review of specific projects by guiding the shape and locations of the structures built west of the park.</p> <p>There would be no impacts on any protected scenic views.</p>

<i>Element of Environment</i>	<i>No Action Alternative</i>	<i>Alternative 1 Scenario A: Broad Rezone-Residential Focus</i>	<i>Alternative 1 Scenario B: Broad Rezone-Commercial Focus</i>	<i>Alternative 2 Focused Rezone</i>	<i>Alternative 3 Urban Design Framework</i>
Recreation	Hubbard Homestead Park, together with other parks nearby, will provide adequate open space and recreation opportunities to accommodate existing and new development in the Northgate Urban Center.	Overall, the total number of park users in the Northgate Planning Area would be expected to be approximately the same as under the No Action Alternative, but residential users would be clustered closer to the proposed new park, potentially increasing use of the park and the demand for recreational amenities within and adjacent to the park.	This alternative would create more demand for recreational amenities from employees due to the large amount of commercial space projected. Overall, the total number of park users in the Northgate Planning Area would be expected to be approximately the same as under the No Action Alternative, but employees would be clustered closer to the proposed new park, thus increasing the demand for recreational amenities.	Impacts would be similar to Alternative 1A, except that the concentration of new residents would be slightly lower.	Impacts would be similar to Alternative 1A, except that the concentration of new residents would be slightly higher.
Transportation	<p>Vehicular traffic associated with projected development would be relatively more dispersed throughout the Northgate area, rather than concentrated along Northgate Way than the action alternatives.</p> <p>Traffic levels of service in 2030 at Northgate Way intersections would be similar to those evaluated in the CTIP EIS. Assuming that all traffic improvements included in the CTIP are provided, all intersection would operate at LOS E or better, except at Meridian Ave. N, which would operate at LOS F due primarily to the unusual geometry of that intersection.</p>	<p>Future development and associated vehicular traffic would be relatively more concentrated along Northgate Way.</p> <p>Without additional mitigation beyond the improvements specified in the CTIP, traffic levels of service in 2030 at Northgate Way intersections would degrade to LOS F at 3rd Ave. NE and 5th Ave. NE, in addition to Meridian Ave. N. Other intersections would operate at LOS E or better.</p> <p>Concentrating mixed-use development in the Urban Center at higher densities, within walking distance of services and transit would generally result in increased residents in the area, and associated increased pedestrian travel and increased use of transit. Increased demand for transit service, while positive in some respects, could also affect King County Metro service planning. Increased congestion in the Northgate Way corridor during peak hours would also affect buses.</p>	<p>Future development and associated vehicular traffic would be relatively more concentrated along Northgate Way.</p> <p>Without additional mitigation beyond the improvements specified in the CTIP, traffic levels of service in 2030 at Northgate Way intersections would degrade to LOS F at 1st Ave. NE and 5th Ave. NE, in addition to Meridian Ave. N. Other intersections would operate at LOS E or better.</p> <p>Impacts on pedestrian activity and transit usage would be similar to Alternative 1A.</p>	<p>Future development and associated vehicular traffic would be relatively more concentrated along Northgate Way.</p> <p>Assuming construction of the improvements specified in the CTIP, traffic levels of service in 2030 at Northgate Way intersections would operate at LOS E or better, except at Meridian Ave. N, which would operate at LOS F.</p> <p>Impacts on pedestrian activity and transit would be similar to Alternative 1A.</p>	<p>Future development and associated vehicular traffic would be relatively more concentrated along Northgate Way.</p> <p>Assuming construction of the improvements specified in the CTIP, traffic levels of service in 2030 at Northgate Way intersections would operate at LOS E or better, except at Meridian Ave. N, which would operate at LOS F.</p> <p>Impacts on pedestrian and transit travel usage would be similar to Alternative 1A.</p>

<i>Element of Environment</i>	<i>No Action Alternative</i>	<i>Alternative 1 Scenario A: Broad Rezone-Residential Focus</i>	<i>Alternative 1 Scenario B: Broad Rezone-Commercial Focus</i>	<i>Alternative 2 Focused Rezone</i>	<i>Alternative 3 Urban Design Framework</i>
Air Quality	<p>New development would result in demolition and construction activities and cause localized increases in ambient concentrations of suspended particulate matter. Would be more dispersed under No Action, rather than concentrated along Northgate Way.</p> <p>Hot spot analysis for Northgate Way intersections with 1st Ave. NE, 3rd Ave. NE and 5th Ave. NE indicates peak-hour carbon monoxide (CO) emissions would not approach or exceed EPA health standards.</p> <p>Greenhouse gas (GHG) emissions would occur from development.</p>	<p>New development indirectly resulting from any of the rezone alternatives would result in demolition and construction activities and cause localized increases in ambient concentrations of suspended particulate matter.</p> <p>Hot spot analysis for same intersections indicates peak -hour CO emissions would be slightly higher than No Action but would not approach or exceed EPA health standards.</p> <p>GHG emissions would occur from development. All alternatives would encourage concentration of growth into a more compact form of development focused along the Northgate Way corridor. This concentration could help encourage greater transit use and non-motorized travel, which could reduce GHG emissions. . Specific GHG assessments will be prepared for project-level proposals within the study area.</p>	<p>New development indirectly resulting from any of the rezone alternatives would result in demolition and construction activities and cause localized increases in ambient concentrations of suspended particulate matter.</p> <p>Hot spot analysis for the same intersections indicates peak -hour CO emissions would be similar to Alternative 1A and would not approach or exceed EPA health standards.</p> <p>GHG would occur from development. As with Alternative 1A, concentrating growth in the Urban Center at higher densities is expected to reduce GHG emissions as compared to the No Action Alternative. Alternative 1B would result in a similar reduction in auto travel to Alternative 1A. Specific GHG assessments will be prepared for project-level proposals within the study area.</p>	<p>New development indirectly resulting from any of the rezone alternatives would result in demolition and construction activities and cause localized increases in ambient concentrations of suspended particulate matter.</p> <p>Lower CO concentrations than Alternatives 1A or 1B; would not approach or exceed EPA health standards.</p> <p>GHG would occur from development. As with Alternative 1A, concentrating growth in the Urban Center at higher densities is expected to reduce GHG emissions as compared to the No Action Alternative. Alternative 2 would result in a smaller reduction in auto travel compared to Alternative 1A because it would not concentrate growth as much as Alternative 1A. Specific GHG assessments will be prepared for project-level proposals within the study area.</p>	<p>New development indirectly resulting from any of the rezone alternatives would result in demolition and construction activities and cause localized increases in ambient concentrations of suspended particulate matter.</p> <p>Similar CO concentrations to Alternatives 1A; would not approach or exceed EPA health standards.</p> <p>GHG would occur from development. Alternative 3 would be the most intensive and would create the greatest potential reduction in auto travel, and the greatest potential use of public transit and non-motorized forms of transportation. Specific GHG assessments will be prepared for project-level proposals within the study area.</p>
Water Resources	<p>The rezone study area does not include any streams, but does include some small wetlands. Surface water runoff has been directed to underground pipes that discharge to two streams just outside of the study neighborhood that are part of the Thornton Creek watershed. Water quality in these two streams has not been documented directly but immediately downstream from the confluence of these streams with Thornton Creek, water is of fair quality but contains pollutants that are typical of urban areas. These include iron, phosphorus, manganese, fecal coliform bacteria, dissolved solids, and pesticides.</p> <p>Groundwater resources in the rezone study area provide cool water and support dry season flow in streams to the east of the rezone study area. In addition, some areas contain peat soils that, if dewatered due to construction, can both deplete groundwater flow and cause settling on adjacent properties.</p> <p>An incremental increase in impervious surfaces could occur. However, development would be controlled by the City’s Stormwater, Grading, and Drainage Ordinance, which regulates both temporary and long term impacts of development, and by recently adopted regulations regulating development on peat soils.</p> <p>No significant impacts on water resources are anticipated as long as projects comply with the aforementioned regulations. Some improvement in water quality is possible because existing</p>	<p>Impacts to water resources would be similar to those under the No Action Alternative. This alternative would allow incrementally greater impervious surface coverage, particularly in Subareas B and C. Sites that redevelop would have to meet the open space requirements of the Land Use Code, which in some cases would result in an increase in pervious areas.</p> <p>No significant impacts to water resources are anticipated as long as projects comply with these regulations. Some improvement in water quality is possible because existing development would be replaced with development that would have higher water quality and better stormwater flow control due to the nature of current regulations.</p> <p>The cumulative effects of new impervious surfaces in the area would be offset to some degree by development of Hubbard Homestead Park, which will contain pervious surfaces and replace a surface</p>	<p>Impacts would be the same as for Alternative 1A.</p> <p>No significant impacts to water resources are anticipated as long as projects comply with these regulations. Some improvement in water quality is possible because existing development would be replaced with development that would have higher water quality and better stormwater flow control due to the nature of current regulations.</p> <p>The cumulative effects of new impervious surfaces in the area would be offset to some degree by development of Hubbard Homestead Park, which will contain pervious surfaces and replace a surface parking lot.</p>	<p>Impacts would be similar to Alternative 1A, except that the increase in impervious surface would likely be slightly less than Alternative 1A, (although greater than No Action).</p> <p>No significant impacts to water resources are anticipated as long as projects comply with these regulations. Some improvement in water quality is possible because existing development would be replaced with development that would have higher water quality and better stormwater flow control due to the nature of current regulations.</p> <p>The cumulative effects of new impervious surfaces in the area would be offset to some degree by development of Hubbard Homestead Park, which will contain pervious surfaces and replace a surface parking lot.</p>	<p>Impacts would be similar to Alternative 1A, except that the increase in impervious surface would likely be slightly less than Alternative 1A, (although greater than No Action).</p> <p>No significant impacts to water resources are anticipated as long as projects comply with these regulations. Some improvement in water quality is possible because existing development would be replaced with development that would have higher water quality and better stormwater flow control due to the nature of current regulations.</p> <p>The cumulative effects of new impervious surfaces in the area would be offset to some degree by development of Hubbard Homestead Park, which will contain pervious surfaces and replace a surface parking lot.</p>

<i>Element of Environment</i>	<i>No Action Alternative</i>	<i>Alternative 1 Scenario A: Broad Rezone-Residential Focus</i>	<i>Alternative 1 Scenario B: Broad Rezone-Commercial Focus</i>	<i>Alternative 2 Focused Rezone</i>	<i>Alternative 3 Urban Design Framework</i>
	<p>development would be replaced with development that would have higher water quality and better stormwater flow control due to nature of current regulations.</p> <p>Development could decrease groundwater incrementally by increasing impervious surfaces and directing additional surface water to pipes instead of allowing natural infiltration. The cumulative effects of new impervious surfaces in the area would be offset to some degree by development of Hubbard Homestead Park, which will contain pervious surfaces and replace a surface parking lot.</p>	<p>parking lot.</p>			
Plants and Animals	<p>The rezone study area is an already urbanized area with limited remaining habitat value. There is one wetland within Subarea C, and several other small wetlands located adjacent to the freeway in the public right-of-way and unlikely to be affected by development. All these wetlands are protected by the City's critical areas regulations.</p> <p>Thornton Creek, which lies outside of but downstream from the rezone study area, hosts a number of fish species, including some salmonid species that are listed as threatened or endangered, although the habitat for these species in Thornton Creek has been degraded substantially with urban development. Community groups have been working to restore fish and wildlife habitat in the watershed.</p> <p>Long term impacts to fish habitat could occur if groundwater flow from the rezone study area is reduced due to new impervious surfaces. See discussion under Water Resources.</p>	<p>Impacts to plants and animals would be similar to those under No Action. This alternative would allow more impervious surface coverage, particularly in Subareas B and C. Thus this alternative could have slightly greater impacts on groundwater flow to nearby streams.</p>	<p>Same as Alternative 1A.</p>	<p>Similar to Alternative 1A, except that the increase in impervious surface would likely be slightly less than Alternative 1A (although greater than No Action).</p>	<p>Same as Alternative 1A, except that the increase in impervious surface would likely be slightly less than Alternative 1A (although greater than No Action).</p>
Construction	<p>Land use impacts during construction could include temporary disruptions to existing businesses and residences. Short-term impacts on low income housing, if any were to be torn down, would be mitigated by notice requirements and relocation payments required for displaced residents. Aesthetic impacts of construction would include material stockpiles and temporary construction offices, in addition to structures under construction. Construction would increase truck traffic to some areas but overall traffic would likely decline after existing development is removed from a site to prepare for development. Water quality could be impacted by soil disturbance and increased erosion during construction, although regulations require that these impacts be strictly controlled. Impacts to fish and wildlife, such as disruption from noise, increased turbidity in stormwater runoff, and potential sedimentation of streams could also occur during construction. Again water quality impacts would be limited by existing regulations.</p> <p>All construction impacts would be of relative short duration and impacts would generally be limited to locations immediately adjacent to the construction site.</p>	<p>Impacts would be similar to the No Action Alternative, except that some areas that would be unlikely to redevelop under the No Action Alternative would be redeveloped and thus more areas would undergo new construction, with associated impacts.</p>	<p>Same as Alternative 1A.</p>	<p>Same as Alternative 1A.</p>	<p>Same as Alternative 1A.</p>

1.7 Mitigation Measures & Other Programs that Could Mitigate Impacts of the Alternatives

Section 1.7 identifies mitigation measures for each element of the environment evaluated in this FEIS. Measures include City programs and existing regulations that would apply to any development in the City, as well as measures that are directly related to the rezone alternatives.

Land Use

- The overall land use pattern encouraged by the rezone alternatives would be generally consistent with Northgate's Urban Center designation and Comprehensive Plan policies; no mitigation is required.
- Potential land use conflicts, identified at a programmatic level, are not considered to be significant. Site-specific land use conflicts could be identified during review of individual project proposals and, if present, would be addressed through existing Land Use Code requirements or SEPA conditions.
- Land uses and densities permitted through an area-wide rezone or contract rezones could be adjusted to address potential conflicts identified in the EIS. Similarly, the Land Use Code's Northgate Overlay District regulations could be amended to address potential conflicts. Several related implementation actions described in the EIS are also intended to address potential impacts and to further the objectives of the Urban Center.
- The City would monitor growth rates to determine if the Urban Center is likely to exceed adopted growth targets. If so, the City could adjust the Urban Center targets in the Comprehensive Plan and adjust the plan accordingly to accommodate or regulate further growth.

Housing

- Under No Action (no rezoning), existing housing within the study area that is not currently regulated as affordable housing could be redeveloped without being required to replace affordable housing. Rezoning under Alternatives 1, 2 or 3 would not per se have an impact on the availability of affordable housing, and no additional mitigation is required. Through separate legislative action, the incentive zoning provision of the Land Use code (SMC 23.58A) may be applied to rezones in the Northgate Urban Center, requiring provision of work force housing in some situations.
- Currently, Seattle's tenant relocation program provides mitigation for low income residents that are displaced by redevelopment. This is the only mitigation for housing impacts authorized by Seattle's adopted SEPA policies. However, other possible strategies for increasing the supply of affordable housing include:
 - Direct funding of affordable housing through various public programs;

- Voluntary participation by developers in housing programs such as the property tax exemption program “Seattle Homes Within Reach”;
- Working with developers to identify creative strategies to incorporate affordable housing in new development as redevelopment occurs.

Aesthetics

- Design review would be required at the project level for most development expected in the rezone study area under any alternative. The Design Guidelines for the Northgate Urban Center, as adopted or amended, would help to ensure that the function, form, and appearance of new structures are compatible with the vision embodied in the neighborhood plan. These Guidelines encourage the provision of street trees and other plantings, as well as building and site features compatible with the built environment, including the relationship of dimensions such as height, bulk, scale and shadows on public spaces.
- Hubbard Homestead Park, now being constructed within the Urban Center, will provide visual relief in addition to recreational space. By including appropriately scaled trees in the park, the visual impact of the surrounding buildings could be softened.

Recreation

- Construction of Hubbard Homestead Park, now underway, will provide additional recreational amenities. The substantial concentration of growth that could occur within the rezone study area may warrant additional facilities and amenities. These needs could be addressed through project level review, or through revision of the Northgate Overlay District regulations. Additional amenities could include pocket parks or small outdoor sitting areas, features of visual interest such as plantings or sculpture, and other amenities like drinking fountains or children’s play equipment.

Transportation

Under any alternative, including No Action, traffic and congestion will increase in the Northgate Urban Center as a result of growth.

- The No Action Alternative, Alternative 2 and Alternative 3 would not require road improvements as mitigation other than those improvements identified in the CTIP.
- Alternatives 1A and 1B could require additional improvements beyond those included in the CTIP, as follows :

Alternative 1A:

- Install a westbound to northbound right turn lane at Northgate Way/3rd Ave NE (requires additional right-of-way, elimination of the southbound left-and-through movement. And would eliminate pedestrian access across the west leg of the intersection)
- Add an overlap signal phase to the northbound and southbound right turns at Northgate Way/5th Avenue NE

Alternative 1B:

- Add a northbound/southbound protected left turn phase at Northgate Way/1st Ave. NE; or
- Install a westbound to northbound right turn lane at Northgate Way/5th Ave. NE (requires additional right-of-way).
- Planned increases in pedestrian and bicycle activity that would result from more intensive development in the Urban Center could be further addressed through regulatory programs designed to enhance the pedestrian environment and encourage non-motorized travel.

Air Quality

- Measures to reduce potential air quality impacts during construction would be applied to individual development proposals. These include a range of construction best management practices designed to reduce exhaust emissions and fugitive dust, and limits on hours of construction.
- No significant impacts are identified on an area-wide basis. Vehicle emission reduction measures resulting from state and federal programs are projected to off-set increased emissions due to larger traffic volumes. Use of cleaner fuels and lesser-polluting vehicles will likely continue the observed downward trend of CO emissions.

Water Resources

- No significant impacts to water resources are identified on an area-wide basis. Project level reviews could include evaluation of specific impacts on groundwater flow, if warranted. If impacts are identified for a specific site, mitigation could include requiring infiltration of stormwater runoff to ensure stream flows are not reduced by new impervious surfaces.

Plants & Animals

No significant impacts to plants and animals are identified on an area-wide basis. Impacts on fish and wildlife dependent on stream flows could be mitigated as described above under Water Resources.

Construction Impacts

Mitigation during construction would be similar for Alternatives 1, 2 and 3 and would include, but not be limited to, the following measures and best practices:

- Temporary erosion and sedimentation control;
- Traffic control;
- Limits on noise from construction activities; and
- Notification for utility service interruptions.

Additional and more specific mitigation could be identified for individual projects through future project-level SEPA review.

1.8 Significant Adverse Impacts that Cannot Be Mitigated

The only significant unavoidable impact that has been identified in the EIS is the impact of growing traffic volumes and congestion at the intersection of N Northgate Way and Meridian Avenue N. Congestion at this intersection is expected to reach Level of Service F with delays over 100 seconds per vehicle during peak hours under the No Action Alternative. Mitigation for these impacts was explored during development of the Northgate CTIP but no feasible mitigation was identified. The intersection is constrained by unusual geometry and existing development that combine to make any possible improvements unreasonably costly.

Under any of the rezone alternatives, peak hour traffic volumes at this intersection would increase. However, the traffic delay at the intersection due to the increased traffic volume is not expected to increase significantly, and average delays could actually decrease to some degree. Most importantly, there is not a significant difference between the delay conditions at this intersection under any of the rezone alternatives.

Furthermore, any large development proposal in the study area will be subject to project-level SEPA review wherein effects of individual projects can be studied more closely.

1.9 Major Conclusions and Remaining Issues to Be Resolved

1. If the rezone successfully stimulates redevelopment in the Urban Center over the next twenty years, growth in households and/or jobs could possibly exceed the current Northgate Urban Center growth targets. The targets will be reviewed and updated when the City updates its Comprehensive Plan.
2. The land use pattern would become more intensive and, depending on the alternative, more diverse. This change would be consistent with Comprehensive Plan policies for Urban Centers. The Urban Center would become incrementally more pedestrian-oriented and less auto-oriented, which is consistent with the desired transformation of Northgate.
3. Some minor, localized land use conflicts could result from larger buildings being located adjacent to less intensive development. Zoning transitions incorporated into the current Land Use Code and the alternatives – particularly Alternative 3 – would reduce this impact. No significant changes to single family neighborhoods would occur under any of the rezone alternatives. Larger buildings could cause shadows to be cast on Hubbard Homestead Park at some times of the day.
4. More intensive development and a broader mix of uses in the Urban Center, along with planned transportation system improvements, could encourage pedestrian travel and transit use. Greater pedestrian improvements, and breaking up the superblocks to increase connections, would enhance walkability; these improvements are identified in Alternative 3 and would be addressed in related actions.

5. Auto congestion and delay would increase under any alternative, including No Action. Most intersections would meet CTIP level of service benchmarks with improvements proposed in the CTIP, with the following exceptions:

- No Action: Meridian Ave N/Northgate Way
- Alternative 1A: 3rd Ave/Northgate Way, and 5th Ave/Northgate Way, and Meridian Ave N/Northgate Way
- Alternative 1B: 1st Ave/Northgate Way and 5th Ave/Northgate Way
- Alternative 3: Meridian Ave N/Northgate Way

With the additional improvements outlined in the EIS, 1st Ave NE, 3rd Ave NE and 5th Ave NE would receive mitigation such that they would also meet the CTIP benchmarks for level of service.

6. Application of the City's adopted incentive zoning program to Northgate, which could be accomplished by amendments to the Northgate Overlay District, could help to encourage provision of family-wage/moderate-income housing if property owners opt to pursue the additional intensity of development.

7. No significant impacts would occur to natural resources – including wetlands, water resources and air quality – as a direct result of the rezone alternatives. However, more intensive redevelopment could increase impervious surfaces incrementally, which could reduce groundwater flow, which could, in turn, indirectly affect stream flow and fish habitat in Thornton Creek to a minor degree. Additional evaluation would occur at the project level to address impacts of impervious surface and infiltration. Project-specific mitigation measures could be imposed (in addition to the requirements of the City's Critical Areas Ordinance, Stormwater Code and other relevant codes) as a result of this review.

CHAPTER 2 PROPOSED ACTION & ALTERNATIVES

2.1 Proponent, Proposal and Location

The City of Seattle is evaluating options for rezoning properties within a portion of the Northgate Urban Center. Depending on the alternative, Seattle City Council action would entail either a legislative rezone (Alternatives 1 and 2) or consideration of subsequent individual site-specific contract rezones (Alternative 3), to permit increased height and/or intensity of use within a portion of the Urban Center located near Northgate Way. Future implementation actions for any of the alternatives would involve a combination of legislative and administrative actions. Depending on the alternative, the proposal could amend the Zoning Map for properties within the study area, could amend sections of the Land Use Code (Title 23), and/or could include administrative actions regarding implementation programs. Potential related actions could include proposed Seattle Comprehensive Plan amendments; legislative amendments to the text of the Northgate Overlay District (SMC 23.71), including new incentive zoning provisions specific to Northgate; amended Northgate-specific Design Guidelines applicable to Northgate; and potential additions to SDOT's right-of-way improvements manual.

The study area for the proposed rezone generally extends along and adjacent to Northgate Way, and is shown in Figure 2-1. It is generally bounded by Meridian Ave. N and Burke Ave. N on the west; by 12th Ave. NE, on the east; approximately NE 114th Street on the north; and NE 107th Street (excluding the Northgate Mall) on the south. The study area contains approximately 98 acres of land and is primarily located within the designated Northgate Urban Center; one parcel is located outside the Urban Center.

The remainder of Chapter 2 includes background information on the proposed action, a brief profile of the Northgate neighborhood, an explanation of the environmental review process, and a description of the alternatives.

2.2 Background Information: Framework for Proposed Action

2.2.1 Overview

Northgate is one of six Urban Centers designated in the City of Seattle's Comprehensive Plan (2005). Urban Centers provide a diverse mix of housing and employment land uses, and are planned to be the most intensively developed neighborhoods in the city. A significant portion of the city's projected 20-year residential growth (58 percent) and employment growth (73 percent) is targeted for designated Urban Centers. Within the four-county Central Puget Sound Region, Urban Centers are a key element in *Vision 2020*, the Puget Sound Regional Council's plan for accommodating growth in accordance with the requirements of the Growth Management Act (GMA) (PSRC, 1995). Northgate is designated as an Urban Center in *Vision 2020*. Consistent with *Vision 2020*, the Seattle Comprehensive Plan, 2005 Update provides 20-year growth targets for the Northgate Urban Center – 2,500 new housing units and 4,220 new jobs through 2024.

The Seattle Comprehensive Plan also includes goals and policies from the Northgate Area Comprehensive Plan (NACP), which was first adopted in 1993 and is discussed in detail below.

Little growth or change occurred in Northgate in the 1990s and the area lagged well behind Comprehensive Plan growth targets due to an economic down-turn, various zoning and regulatory constraints, traffic congestion and lack of infrastructure investments (City of Seattle, Seattle Growth Report 2000). Over the past few years, however, the City responded to these limitations with a number of new initiatives, including public investment in several significant community facilities and improvements, focused regulatory changes, and new planning initiatives. Council Resolution 30642, adopted in December 2003, established a “framework for actions to accomplish future steps for Northgate [including] economic development efforts, multi-family housing incentives, multi-modal transportation, pedestrian and open space improvements, integrated natural drainage strategies, sustainable design and green building, public art, planning for major commercial and multi-family residential development, and meaningful community involvement in these actions.” Council Resolution 30641, adopted in the same time period, instructed Seattle Department of Transportation (SDOT) to prepare the Northgate Coordinated Transportation Investment Plan (CTIP), which was completed in 2006.

If development trends from recent years continued, Northgate could be on track to meet its growth targets. There is sufficient zoned capacity to accommodate forecast future growth, based on the most current growth targets in the Seattle Comprehensive Plan (2005 Update). Extended (2040) growth targets will be adopted as part of future amendments to the Comprehensive Plan in 2011; these will reflect the State Office of Financial Management’s (OFMs) county-wide growth forecasts, allocations to cities from the Countywide Planning Policies, and PSRC’s *Vision 2040*.

2.2.2 Northgate Area Comprehensive Plan

The NACP and implementing zoning regulations were first adopted in 1993 by Resolution 28752. Elements of the plan were re-adopted in modified form in the Northgate Neighborhood Plan section of the Seattle Comprehensive Plan in 2004 by Ordinance 121701; any references in this document to the “adopted Northgate Area Comprehensive Plan,” (NACP) or its policies, or to “neighborhood plans”, refer to the policies adopted by that ordinance. The plan expresses a vision of how the community should grow over time, and provides policies to guide future development and capital facility decisions.

The neighborhood plan envisions a thriving, vital, mixed-use center concentrated in a pedestrian-friendly and transit-supportive pattern of compatible land uses, which protects and maintains existing single family residential neighborhoods. The most intensive and dense activities should be concentrated within the “Core Area” – generally, the Northgate Mall and surrounding high density commercial and multi-family zones north and south of Northgate Way. The core area is shown in Figure 2-2. (Note that some boundaries of the core are irregular and do not consistently follow streets or property boundaries.) This area is described as a major regional activity center, with a mix of uses and densities sufficient to support transit. Other Land Use goals and policies in the NACP include the following:

- Buffering and transition zones should be used to protect residential neighborhoods.
- Commercial activity outside the core should be smaller in scale and serve the adjacent residential neighborhoods.

- Good pedestrian connections between uses should be provided.
- A mixture of commercial activities and residential uses should be promoted in areas zoned Neighborhood Commercial and Residential Commercial.
- Additional multi-family housing opportunities should be promoted in appropriate locations at a compatible scale.

Transportation goals envision an economically viable commercial core with improved alternate means of access, and good vehicular and pedestrian circulation. Medium and high density employment and residential uses should be focused within a 10-minute walk of the transit center, which would help reduce the number and length of vehicle trips and make travel by foot and bicycle more attractive.

The NACP's vision also assumes initial implementation of a regional high capacity transit system and a future light rail station located near Northgate's core. The plan encourages transit supportive land uses adjacent to Sound Transit's proposed Link light rail transit station, as well as good non-motorized access and an attractive pedestrian environment. Note that in November 2008, the region's voters approved funding for an expansion of light rail north to Northgate in 2020, and Lynnwood; east to Mercer Island, Bellevue and Redmond; and south to Federal Way.

2.2.3 2003 Northgate Overlay District Amendments

The NACP resulted in a policy framework and changes to land use regulations for the planning area, which are included in the Northgate Overlay District, SMC 23.71 (adopted by Ordinance 116795). The boundaries of the Northgate Overlay District are shown in Figure 2-2.

In 2003, the City Council amended several provisions of the Northgate Overlay District regulations; these changes occurred in conjunction with approval of a development agreement for redevelopment of Northgate Mall. First, the amendments repealed the requirement that "substantial" developments – defined to include 4,000 square feet on parcels of 6-acres or larger within the Northgate Overlay District – prepare a General Development Plan (GDP). The GDP planning process, as it was implemented, was costly and time consuming for applicants, duplicated existing review processes (such as design review, and the master use permit process) and was widely seen as a disincentive to development in Northgate. In addition, the City Council amended on-site open space requirements in the Northgate Overlay District to make them more flexible and less onerous; designated NE 100th Street and NE 103rd Street as special landscaped arterials; and clarified requirements relating to storefront windows.



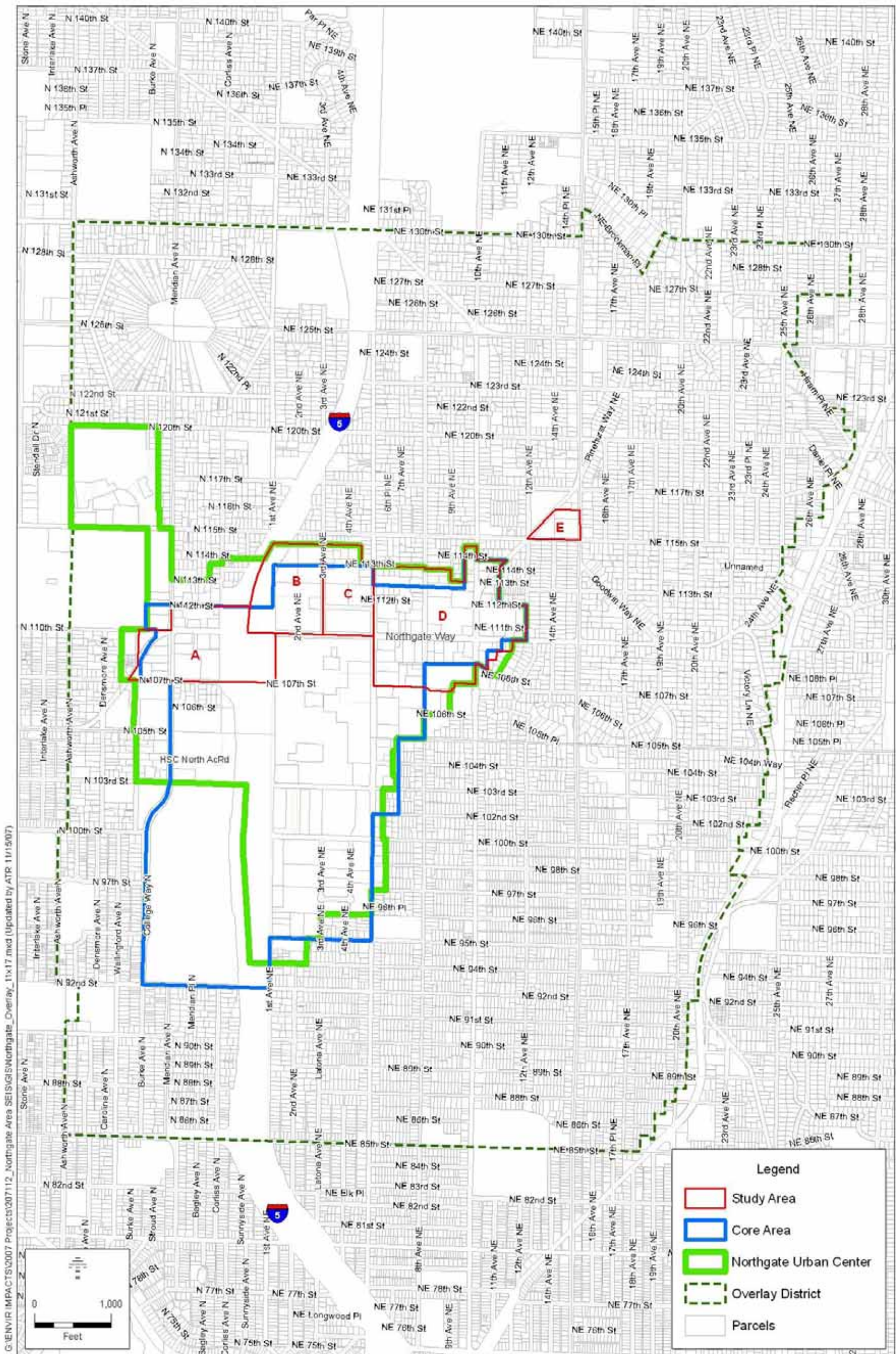
SOURCE: King County 2002, 2008

Northgate Urban Center Rezone EIS

Figure 2-1
Vicinity Map and Study Area for the Northgate Urban Center Rezone (Including Subareas)
Seattle, Washington

2.2.4 Northgate Revitalization

Over the past six years, a number of public and private initiatives have converged in the Northgate area. These are part of the context for the proposed rezone and have advanced the City and community's vision for Northgate. Significant improvements have been completed including the Northgate Branch Library, Community Center and Park campus, Maple Leaf Community Garden, first phase of the Fifth Avenue NE Street Improvements, and the Thornton Creek Water Quality Channel. Other City planning initiatives include the Northgate Urban Center and Overlay District Design Guidelines (adopted 2003), Northgate Open Space and Pedestrian Connections Plan (completed in 2005), and a Northgate Public Arts Plan (completed in 2005) that identifies a public arts program for future Northgate development. In addition, the City has purchased the 3.73 acre King County Metro park-and-ride lot on 5th Ave NE and NE 112th Street. Construction of the new Hubbard Homestead Park began in November, 2009. In conjunction with this new park, the second phase of 5th Avenue NE streetscape improvements will be completed at the park's edge. The Draft Seattle Pedestrian Master Plan (May 2009) also identifies a number of high priority improvement opportunities in the Northgate Urban Center.



G:\ENVIR\IMPACTS\2007\112_Northgate Area SEIS\GIS\Northgate_Overlay_11x17.mxd (Updated by ATR 11/15/07)

SOURCE: King County 2002, 2006

Northgate Urban Center Rezone EIS
Figure 2-2
 Map of Northgate Overlay District and Northgate Core Area

A number of significant private projects are also completed, underway or being planned, including:

- Redevelopment of the Northgate Mall (Simon Properties) – new retail (116,750 square feet) and parking structure (approximately 183,744 square feet) (completed);
- Thornton Place (Lorig Associates) – cinema, restaurants, retail, apartments and condominiums, and senior housing (388 residential units, 144 senior housing units, and 124,870 square feet of commercial uses (completion occurred in spring 2009);
- 507 Northgate (Wallace Properties-Phase I) – residential and retail (163 residential units and 53,000-56,000 square feet of retail) (completion occurred in 2009);
- King County Metro’s Northgate Transit Oriented Development (Northgate TOD)– planned integration of a new transit and future light rail station with high density, mixed-use redevelopment (retail, residential and lodging uses); and
- Proposals in the planning stage for mixed-use (residential/retail), retail, residential and office development for the Wallace Phase II, Northgate Apartments, and The Court at Northgate properties, all located within the rezone study area, are currently being studied.
- North Seattle Community College (located outside the Urban Center) is proposing to extend the life of its existing Major Institution Master Plan, which guides the college’s long-term growth.

Other future developments in Northgate include extension of Sound Transit’s Link light rail system to Northgate (North Link), which was approved by the region’s voters in November 2008, and construction of a new station spanning NE 103rd Street (Sound Transit’s currently preferred site).

2.2.5 Northgate Coordinated Transportation Investment Plan (CTIP)

In September 2006, the Seattle Department of Transportation (SDOT) completed the Northgate Coordinated Transportation Investment Plan (CTIP), Draft and Final EISs were prepared for this Plan. The CTIP is a transportation facility plan intended to implement the Northgate area vision, goals and policies of the City’s Comprehensive Plan. It includes a comprehensive program of transportation improvements that address all components of Northgate’s transportation system – auto, transit, pedestrian and bicycle. The Plan is based on accomplishing four major goals: moving people safely and efficiently, reducing drive-alone travel, protecting residential neighborhoods, and supporting planned housing and economic development. Recommended improvements include additional bicycle lanes, sidewalk improvements and pedestrian crossings; curb and gutters; signalization and vehicle turning improvements; transit service enhancements; shared parking, to more efficiently allocate parking needs; and a few projects involving road or freeway ramp widening at existing congestion points.

The CTIP prioritizes improvements for inclusion in the City’s Capital Improvement Program. It also recommends a fee-based mitigation program, as well as other mechanisms for financing improvements, that will apply to future development proposals in Northgate.

The CTIP is based on planned growth in Northgate to the year 2030. Its study area encompasses the Northgate Way corridor considered for rezoning in the EIS alternatives, but also covers the larger Northgate Overlay District and extends east into a portion of the Lake City neighborhood. A goal of the Urban Center rezones is to remain within the projections, analyses and improvements identified in the CTIP. A list of CTIP projects within and immediately adjacent to the study area, and the current status of these projects, was included in the Draft EIS.

2.2.6 Northgate Design Charrette and Stakeholders Advice Memo

In December 2006, the City convened a day-long design charrette to engage the Northgate community in a conversation about how to coordinate the next round of public and private development opportunities in the Northgate Urban Center. Participants generally supported the idea of increased density along Northgate Way through a legislative rezone that would consider varying heights and encourage additional mixed use development in the commercial and multifamily zones north of Northgate Way. Participants also recognized the opportunity presented by several large redevelopable parcels of land.

In April, 2007, the Northgate Stakeholders Group transmitted a formal advice memo to the Mayor and City Council supporting a City proposal for a legislative rezone to encourage continued revitalization of the Northgate Urban Center. The Stakeholders' Group made the following key recommendations:

- Enlarge the study area to include properties from Meridian Ave N to Roosevelt Way NE along Northgate Way and property owned by Sy Iffert on Pinehurst Way NE and NE 115th Street. Also, consider a second phase which would focus on the properties near the future Sound Transit Northgate Station and Metro/King County Transit Oriented Development (Northgate TOD);
- Consider heights up to a maximum of 125 feet with modulation in rooflines and sensitive transitions to single family neighborhoods, and development that breaks up the superblocks;
- Use the EIS process as the public process for engaging the community regarding the proposal;
- Include a public benefits piece in the legislation that prioritizes transportation and pedestrian improvements in Northgate.

2.2.7 Northgate Urban Design Framework Workshop

The City has continued to engage the community and to discuss land use concepts and tools that could reinforce Northgate's transformation. Publication of the Northgate Urban Center Rezone Draft EIS in May, 2008 provided additional information for this ongoing discussion. In November, 2008, City staff held a community workshop in Northgate to discuss a number of guiding principles for the next step in Northgate planning. These principles, which are based on direction in adopted plans, policies and regulations, included the following:

- Create an urban design plan to guide public and private investments;
- Enhance the pedestrian environment and network of connections;

- Create a coordinated street and transportation network;
- Integrate publicly accessible open space into private development;
- Include art in the public realm;
- Increase density in the Urban Center;
- Provide transitions between zones of differing densities and heights;
- Site and design buildings to reinforce the pedestrian realm;
- Strive for “Net zero” environmental footprint; and
- Actively provide for affordable housing.

Workshop participants discussed options for how these principles might be achieved in Northgate, including several concepts for open space, connectivity and building heights. Final EIS *Alternative 3: Urban Design Framework*, described in Section 2.5 below, reflects many of the ideas generated at the workshop.

2.3 Neighborhood Profile

The Northgate Urban Center is 411 acres in area (SDOT, 2005). In 2005, the population within the Northgate Urban Center was estimated at 4,738 people, residing in 2,907 housing units. The population is more ethnically and racially diverse than the city as a whole. The median age is 35.5, and average household size is about 1.7 persons. Approximately 11 percent of the population is under age 18, and 19 percent is over age 65. Median household income of residents in 1999 was \$31,000. Approximately 16 percent of the population is at poverty status. Median housing value was \$222,222 as of the 2000 Census, and median monthly rent was \$667. The residential vacancy rate was approximately 4.7 percent. Median household income in this same period was \$31,000. Employment is an estimated 10,604 jobs, with almost 84 percent of the total in the services and retail sectors.

Existing land use in the Northgate Urban Center is dominated by commercial and mixed-use, which comprises almost 42 percent (172 acres) of the total area (411 acres). Residential uses comprise 19 percent of the total area, with most (17 percent) in multi-family use (70 acres). Almost 27 percent of the total area is composed of streets, roads and right-of-way. Institutions, including Northwest Hospital, make up 7 percent of existing land use.

2.4 Environmental Review Process

2.4.1 Overview of EIS Process

This EIS is being prepared to comply with the requirements of the State Environmental Policy Act (SEPA). These requirements are contained in state statute (RCW 43.21C), state rules (WAC 197-11) and the City of Seattle’s SEPA Ordinance (SMC 25.05).

A major purpose of SEPA is to ensure that environmental effects are considered in decisions on “proposals,” a term which includes public plans and legislation (referred to as non-project or programmatic actions) as well as public or private development projects. An environmental

impact statement (EIS) is one type of document that may be used to describe, evaluate and disclose the impacts of a proposal. An EIS also examines alternative ways of accomplishing a proposal's purpose, and techniques that may be used to mitigate (i.e., avoid, reduce, or minimize) identified impacts. Communicating such information to the public, agencies, tribes and decision makers before a decision is made is a key objective of SEPA. The required contents of an EIS, the detail of analysis required, as well as requirements for publication, notice, commenting, and using existing environmental documents, are set forth in the previously referenced laws.

2.4.2 Prior Environmental Documents

The City prepared an EIS in 1991 to support development of the Northgate Area Comprehensive Plan (NACP). That EIS evaluated the environmental effects of the proposed plan on land use, population, housing, employment, air quality and transportation. The NACP EIS evaluated the impacts of growth which was assumed to include 3,000 housing units and 9,300 jobs during a 20-year planning horizon.

In 2006, SDOT prepared an EIS for the CTIP. It evaluated impacts of transportation facility improvements on traffic, air quality, land use, population and housing. Another purpose of the CTIP EIS, articulated in Council Resolution 30641, was to prepare an area-wide transportation analysis which could be used by property owners when permitting future projects.

2.4.3 SEPA Compliance for the Northgate Urban Center Rezone

DPD performed a number of preliminary planning and environmental analyses to help define the parameters of the Northgate Urban Center Rezone alternatives. These initial steps included: (1) a preliminary transportation analysis, to identify the ability to focus a greater portion of Northgate's projected growth within the Urban Center and, more specifically, along Northgate Way, within the constraints of the area's existing transportation system and the CTIP's planned improvements; and (2) an assessment of market and economic conditions, to help assess the redevelopment potential of properties within the study area. These preliminary studies are discussed below in subsection 2.5.2.4.

Pursuant to SEPA, the City published a determination of significance (DS) on 2007, and received comments on the scope of the EIS from agencies and individuals. The scoping comment period extended from April 16, 2007 to May 16, 2007; a scoping meeting was held on May 3, 2007 and attendees provided verbal and written comments on the scope of the EIS. DPD used that input to help determine the contents of this EIS.

2.4.4 Scope of Northgate Urban Center Rezone EIS

Programmatic Document

EISs for plans, policies, and programs – like the CTIP and this rezone proposal – are referred to as “programmatic” or non-project documents. Because these types of government actions are usually broad in scope and area, the analysis in programmatic EISs is also broad in scope and general in nature. In addition, because the proposal is legislative and area-wide, it does not contain detailed information about future development on each parcel that is subject to the rezone. However, preliminary development plans or concepts for individual parcels (e.g.,

Northgate Apartments, The Court at Northgate, Wallace Phase II) are incorporated where such information is available.

Phased Review

This EIS is also part of a course of phased environmental review for actions in the Northgate Urban Center, consistent with provisions in WAC 197-11-060(6) and SMC 25.05.060.E. In general, phased review involves a sequence of environmental documents that proceeds from general, programmatic and/or area-wide documents for planning projects, to more focused, detailed analyses for site specific development proposals. To the extent required by SEPA, future development projects within Northgate will undergo individual environmental review. That project-specific review may rely on or use all or parts of the present EIS.

Impacts Considered

This EIS examines the direct, indirect and cumulative impacts of the possible rezones. Cumulative impacts include those associated with growth in Northgate including incremental growth from the rezone alternatives. Elements of the environment addressed include land use, housing, aesthetics/urban design, transportation, air quality, water resources, and plants and animals. By itself, the rezone alternatives will not have any direct effect on the environment, since they involve only changes to the City's Land Use Map and changes to the text of the land use code. Rezoning would, however, provide a framework for future project proposals within the rezone area. Development of these sites would, over time, result in an intensification of development within the Northgate Way corridor.

Other elements of the environment were not considered because it is unlikely that an intensification of land use envisioned through the rezone alternatives considered would significantly affect them. Rezoning would not significantly alter the impacts on soils, noise, environmental health, or public services and utilities that would occur with future growth even without the rezone. There are no known historic or cultural resources that would be affected by rezoning.

Non-Conforming Uses and Sites

It is common for changes in zoning to create or potentially exacerbate non-conformities relating to land uses or dimensional standards (e.g., height, bulk, setbacks, parking, open space). Numerous non-conformities may exist with respect to individual sites or buildings within the Northgate Urban Center Rezone area as a result of changes to the land use code since a site was developed. As a general principle of public policy, non-conformities are undesirable and should be limited. The Seattle Land Use Code (SMC 23.42) limits the ability of a property owner to expand or change a non-conforming use or structure.

The number of parcels in the rezone area that may be similarly affected is unknown, since potential nonconformities would depend on the nature of future redevelopment proposals. In the context of the EIS, the effect of non-conformities is likely to be a reduction of some unknown magnitude to the amount of redevelopment likely to occur in the study area. For this reason, the amount of redevelopment assumed for the EIS alternatives, including No Action, is likely overstated.

Separate Actions

Hubbard Homestead Park

All EIS alternatives assume development of Hubbard Homestead Park on the approximate 3.73-acre property located at 5th Avenue NE and NE 112th Street that the city purchased from King County. Park construction work began in November, 2009. While the park is not part of the rezone proposal, the EIS does consider the potential impacts of development under the rezone alternatives on a future park in this location.

Incentive Zoning

An Incentive Zoning program, which was described in section 2.5.3.4 of the Draft EIS, was adopted by the City Council in December, 2008 (Ordinance 122882, codified as SMC 23.58A) after undergoing independent environmental review. The Draft EIS incorrectly described this program as closely related and connected to the Northgate Rezone alternatives for purposes of environmental review. In fact, the incentive zoning program was always envisioned as an independent project and was not evaluated in the Draft EIS except to the extent that it might apply to address some identified impacts. While rezones in Northgate could be subject to the program, as would rezones in most of the City, there is no special or unique connection or dependence between the Northgate rezone alternatives and the incentive zoning program.

The regulation provides rules that will guide bonus provisions applicable to future rezones; it becomes applicable when regulations for specific zones or geographic areas are adopted or amended and reference SMC 23.58A. The program is voluntary; its provisions do not apply if property owners develop under existing zoning or to the “base” zoning to which the bonus provisions would not apply.

In general, the rules require that private developers provide affordable workforce housing if they elect to take advantage of increased height and development densities. For projects more than 85 feet in height, the housing may be provided on-site, off-site, or through payment of a fee in lieu. For projects 85 feet or lower, performance is the only option for achieving the bonus. For projects in which heights are greater than 85 feet, 60 percent of the bonus floor area must be achieved through provision of affordable workforce housing. The balance of the bonus may be achieved through the provision of affordable housing or other public amenities, determined through future definition of the bonus program.

As discussed further below, the City plans to propose incentive zoning provisions for Northgate that would: establish the applicability of incentive zoning in contract rezones that might occur within the Northgate Urban Design Overlay area; establish a bonus program through which projects higher than 85 feet can achieve a portion of their bonus and mitigate the additional impacts of taller, more intensive development; and clarify the calculation of bonuses in mixed-use developments.

Other Programs

Several other City land use programs that would apply to Northgate are currently being developed or proposed, and are described in this Final EIS (see Section 2.5.3.5 of this Chapter). These separate programs include amendments to the Northgate Overlay District (SMC 23.71), incentive zoning provisions, additions and edits to the Urban Design Guidelines, and new administrative streetscape plans. Most are conceptual at this time and draft regulations are not yet available. These programs would provide land use tools that would help accomplish the goals of Northgate revitalization. They are primarily the result of ongoing discussions between the City and neighborhood stakeholders and seek to address planning and design issues in the Northgate Urban Center; as such, they are part of larger Northgate planning and revitalization efforts that are continuing to occur. These implementation programs are not connected to a particular EIS alternative and could apply to any alternative, including No Action. In general, these programs would not result in significant adverse environmental impacts, would assist in realizing improvements, and would help to mitigate impacts that may otherwise occur.

A Comprehensive Plan amendment has also been proposed and will be considered independently during the City's annual Comprehensive Plan amendment docket process. This proposal would add and/or revise policy language to express general support for rezones within the Northgate Urban Center that are consistent with Comprehensive Plan policies. The rezone alternatives are not dependent on this amendment.

2.4.5 Draft and Final EISs

The Draft EIS for the Northgate Urban Center Rezone proposal was published on May 1, 2008 and the comment period was open through June 17th (including an extension). A public meeting was held on May 28, 2008, to receive verbal and written comments on the EIS. Chapter 4 of this Final EIS contains responses to comments received on the Draft EIS. A new alternative is also evaluated (Chapter 3).

As noted in the EIS, the EIS rezone alternatives are considered to represent a range of options for rezoning properties in the Urban Center to accomplish a number of policy objectives. None of the Draft EIS alternatives was considered "preferred" or specifically proposed for City action. The stated intent, consistent with the goals of SEPA, was to use the information in the Draft EIS, along with public comment, to identify a new or hybrid alternative, and/or to select an alternative for further consideration. The Final EIS identifies a new alternative, described in Section 2.5, which will advance these purposes.

2.5 Description of Proposal & Alternatives

2.5.1 Proposal and Objectives

The proposal would advance Seattle Comprehensive Plan and Northgate neighborhood planning objectives through rezones of properties in the vicinity of Northgate Way within the Northgate Urban Center. This "north core subarea" is a key portion of the Northgate Urban Center, where the nature of future growth and development will play an important role in determining how successfully the Comprehensive Plan's goal of a vibrant, walkable, and livable Urban Center is achieved. The three "action alternatives" include both legislative and privately-initiated contract

rezones, different intensities and height of development, and different geographic rezone areas. In a separate but related action, a Comprehensive Plan policy would be added to identify general support for possible future rezones in the north core subarea. Implementing programs that would apply to any of the EIS alternatives will also be considered.

The overall objectives of the rezone include the following:

- Implement the City of Seattle Comprehensive Plan's goals for Urban Centers;
- Implement the vision of the Northgate community expressed in the Comprehensive Plan;
- Use public investments efficiently in service of City policy goals and the community's vision;
- Maintain the transportation system consistent with the Northgate Coordinated Transportation Investment Plan (CTIP);
- Achieve an attractive urban form through height transitions and pedestrian orientation;
- Focus additional growth, and leverage the development opportunities presented by a number of large private parcels located along the Northgate Way corridor and the future City park located at 5th Ave. and 112th Street; and
- Incorporate a voluntary bonus program whereby increased density/intensity of development beyond the base zoning is achieved when features such as affordable housing are provided to help mitigate the impacts of development.

The vision and goals of Seattle's Comprehensive Plan for the Northgate Urban Center also provide a context for the proposed rezone. Please refer to the discussion in subsection 2.2 above.

2.5.2 Method of Analysis

2.5.2.1 Rezone Study Area

The study area for the proposed rezone is shown in Figure 2-1. I-5 divides the study area, and approximately one-third of the area lies west of the freeway. The study area is located within the Northgate Urban Center and contains approximately 98 acres of land that are currently developed with a combination of auto-oriented retail, including some large-scale stores, office and service uses, parking lots, and housing. The Seattle Department of Parks and Recreation is currently constructing Hubbard Homestead Park on the Metro Park-and-Ride Lot on NE 112th Street and 5th Avenue NE. Northgate Way carries heavy volumes of traffic and the street contains few pedestrian amenities.

The area immediately south of the study area -- also located within the Northgate Urban Center and Core Area -- contains the Northgate Mall, a regional shopping center that recently underwent redevelopment, and several other recent redevelopment projects, including the Thornton Place mixed use development, 507 Northgate Way, Northgate Community Center, Library, and Park and the Thornton Creek Water Quality Channel. The areas north and east of the study area (and the Urban Center) generally consist of single family housing.

2.5.2.2 Subareas

Several subareas have been defined within the overall study area to aid in the discussion and analysis in the EIS. Subareas are a commonly-used technique for planning and environmental analysis and simplify references to specific locations. The subareas are intended to reflect factors such as parcel size, physical location, adjacent uses and overall context. Use of planning subareas will also permit identification of appropriate mitigation measures and regulatory requirements in a more discrete manner. The subareas are shown on Figure 2-1 and are described in Table 2-1.

Table 2-1. Subarea Descriptions

<i>Subarea</i>	<i>General Location/Boundaries</i>
A	West of I-5, generally from Corliss Ave on the east to Meridian Ave and Burke Ave on the west, N. 112 th Street on the north, and N. 107 th Street in the south
B	1 st Ave NE to 3 rd Ave NE, between Northgate Way and north of NE 114 th Street
C	3 rd Ave NE to 5 th Ave NE, between NE 112 th Street and north of NE 114 th
D	The balance of the study area within the Urban Center along and adjacent to Northgate Way; the north boundary is irregular
E *	A triangular area between Pinehurst Way on the west and 15 th Ave NE on the east, and between NE 115 th Street on the south and 117 th Street on the north, outside the Urban Center

* Subarea E is not considered appropriate for rezoning under the EIS alternatives. This subarea is outside the designated Northgate Urban Center; the Urban Center boundary will define the maximum outer boundary of the area eligible for either legislative or contract rezones.

2.5.2.3 Growth Assumptions

City of Seattle growth targets for Northgate are shown in Table 2-2. The CTIP and CTIP EIS were based on the Comprehensive Plan’s adopted 2024 population and employment allocations for Northgate – an addition of 2,500 households and 4,220 jobs. The CTIP also used Puget Sound Regional Council (PSRC) forecasts to estimate the traffic implications of growth through the year 2030. Estimates used for traffic modeling for the CTIP assumed 20,000 total households and 27,000 jobs in 2030 for the broader Northgate CTIP study area.

The EIS rezone alternatives assume that growth in the study area to 2030 will generally be within the range identified in Northgate’s household and employment projections, shown in Table 2-2. One of the intended effects of the Northgate Urban Center Rezone is to attract, focus and

accelerate development along the Northgate Way corridor; for the purposes of impact analysis, it is assumed that this will shift growth from other portions of the larger Northgate planning area.

Table 2-2. Northgate Growth Targets

	<i>2024 Urban Center Growth Target (Increment)</i>	<i>2024 Urban Center (Total)</i>	<i>2030 Northgate CTIP Study Area (Total)</i>
Households	2,500	5,990	20,000
Jobs	4,220	15,250	27,000

Sources: Seattle Comprehensive Plan; CTIP Draft EIS

It is also possible, however, that the rezone could stimulate growth within the Urban Center and exceed the 2030 projections. Growth could be attracted from adjacent areas outside the Northgate Urban Center. Although the timing of development is uncertain, the implications of an increase in growth within the 2030 period are discussed in this EIS. Growth exceeding these assumed projections, if it occurred, would likely require an adjustment in Northgate’s allocation in the Comprehensive Plan, as well as additional investments in transportation and other improvements.

2.5.2.4 Preliminary Analysis – Traffic and Real Estate Market Conditions

As noted above, objectives of the rezone proposal include remaining consistent with the Comprehensive Plan, including applicable growth targets, and maintaining the viability of Northgate’s transportation system as defined by the capacity provided by improvements identified in the CTIP. With the help of its consultant team, the City conducted several preliminary studies to test and frame rezone alternatives that could meet the project’s objectives.

The transportation consultant initially tested the probable effects of rezoning on key intersections, as a means to gauge how much development could be accommodated without triggering additional (i.e., beyond CTIP) improvements. This preliminary traffic analysis (Mirai, 2007) generally assumed that one incremental increase in zoning intensity and height (e.g., from Neighborhood Commercial 3 with a 65-foot height limit (NC3-65) to Neighborhood Commercial 3 with an 85-foot height limit (NC3-85) would occur. The analysis used City land capacity data to identify parcels considered likely to redevelop. The preliminary traffic analysis generally assumed that the overall amount of growth in Northgate would remain within the Comprehensive Plan’s growth targets, but that some growth would shift toward properties along the Northgate Way corridor as a result of the rezone. Using these assumptions, the preliminary analysis confirmed that most study intersections would operate within the parameters of the CTIP level of service benchmarks in 2030 (generally LOS E), with the exception of Northgate Way/Meridian Avenue N., which would decline to LOS F with or without a rezone.

To further test assumptions and help define reasonable alternatives, the City engaged a real estate economics consultant to provide information about real estate market conditions in Northgate. This analysis (Heartland, 2007) led to insights about development dynamics within Northgate –

for the Urban Center as a whole and for individual parcels – and provided input to estimates of the probable amount and types of development that would occur in the near, mid and longer terms (Heartland, 2007). The analysis also identified some economic implications of imposing public amenity requirements. The market for housing in the Northgate Urban Center is still relatively young. Its maturity will be proven based on the success of current mixed-use projects (e.g., 507 Northgate and Thornton Place). In addition, the economic recession of 2008/2009 adds uncertainty to the Northgate real estate market that mirrors the city as a whole. In this environment, the pace of redevelopment in Northgate is expected to be slow. In addition, when economic recovery begins, excessive regulatory requirements could further delay Northgate’s transition from an auto-oriented retail destination to a high density mixed-use, pedestrian-oriented urban center.

2.5.3 Rezone Alternatives

The EIS examines three alternatives for how the study area could be rezoned to further the vision, objectives and Comprehensive Plan and neighborhood planning policies for the Northgate Urban Center, and different scenarios for the type and form of development that could occur. None of the Draft EIS alternatives was “preferred” or proposed. In general, the rezone alternatives in the Draft EIS were intended to bracket or “book-end” a wide range of possibilities for rezoning, from “no action” to maximum likely intensity. Final EIS Alternative 3 has been developed in response to Draft EIS commentary and follow-up analysis. It is not preferred or proposed at this time, however.

Defined broadly, the proposal includes a rezone strategy that would be implemented either through legislative rezones (as assumed in Alternatives 1 and 2) or through future privately-initiated “contract rezones” (as assumed in the Alternative 3). Rezones would help direct and focus projected growth, particularly housing, at higher densities and intensities of development in locations within the heart of the Northgate Urban Center. The proposal would help fulfill Comprehensive Plan and neighborhood planning objectives related to the future growth and development of a denser, more active and more livable Urban Center environment at Northgate.

In addition, as discussed further below, all alternatives assume that the City will propose, as separate actions, several regulatory programs, including an incentive zoning program, and revised Northgate Overlay District regulations and design guidelines. These programs would help to achieve a range of policy objectives for the Urban Center.

Calculations of assumed type and amount of development for each parcel under each alternative are included in Appendix A. It should be noted that for all EIS alternatives, some properties that would be rezoned are not considered likely to redevelop by 2030, due to economic and market factors. Parcels assumed to redevelop are identified in Appendix A. The amounts of development considered likely to occur under No Action and other EIS alternatives are shown in Table 2-3.

Table 2-3. Estimated Growth for Rezone Alternatives

<i>Alternative</i>	<i>Total New Residential Units within the study area</i>	<i>Net Increase in Residential Units over the No Action Alternative Due to Rezone</i>	<i>Total New Commercial Floor Area within the study area (square feet)</i>	<i>Net Increase in Commercial Floor Area over the No Action Alternative Due to Rezone (square feet)</i>	<i>Total Job Growth</i>
<i>No Action</i>	2,362	--	324,104	--	858
<i>1.A Broad Rezone – Residential Focus</i>	4,064	1,702	1,023,737	699,633	2,711
<i>1.B Broad Rezone – Commercial Focus</i>	919	-1,433	3,946,647	3,622,543	10,453
<i>2 Focused Rezone</i>	3,431	1,069	818,321	494,216	2,167
<i>3.Urban Design Framework</i>	4,189	1,827	954,443	630,339	2,528

Note: All numbers shown in this table reflect the estimated potential net increase in jobs or housing, taking into account the housing or businesses that would be replaced with new development. The table has been updated since the Draft EIS to reflect minor corrections to calculations. The magnitude of the changes is small and the changes do not affect the prior conclusions of the Draft EIS.

2.5.3.1 No Action Alternative

SEPA requires that an EIS consider the alternative of not taking the proposed action. This provides a baseline which other alternatives may be compared to. Taking no action would mean that rezones would not occur and existing zoning would be retained in the near-term. Growth could still occur under the No Action Alternative as permitted by existing regulations.

Existing zoning is shown in Figure 2-3. Development under the No Action Alternative would generally occur as assumed in the Comprehensive Plan and the CTIP, and would include a mix of housing and jobs. No additional stimulus for housing would be provided by rezoning, and housing and job development in Northgate could continue to lag. Growth probably would be relatively more dispersed, and may or may not be focused along Northgate Way. Northgate Way could remain an auto-oriented, suburban scale commercial strip. The rate and amount of growth

is assumed to continue at present levels in a manner consistent with Comprehensive Plan growth assumptions. It is acknowledged that the large opportunity parcels (Northgate Apartments, The Court at Northgate and Wallace Phase II) could proceed as proposals for contract rezones, and could, therefore, eventually achieve higher development intensities than currently permitted. However, the No Action Alternative considers only what is allowed under current zoning.

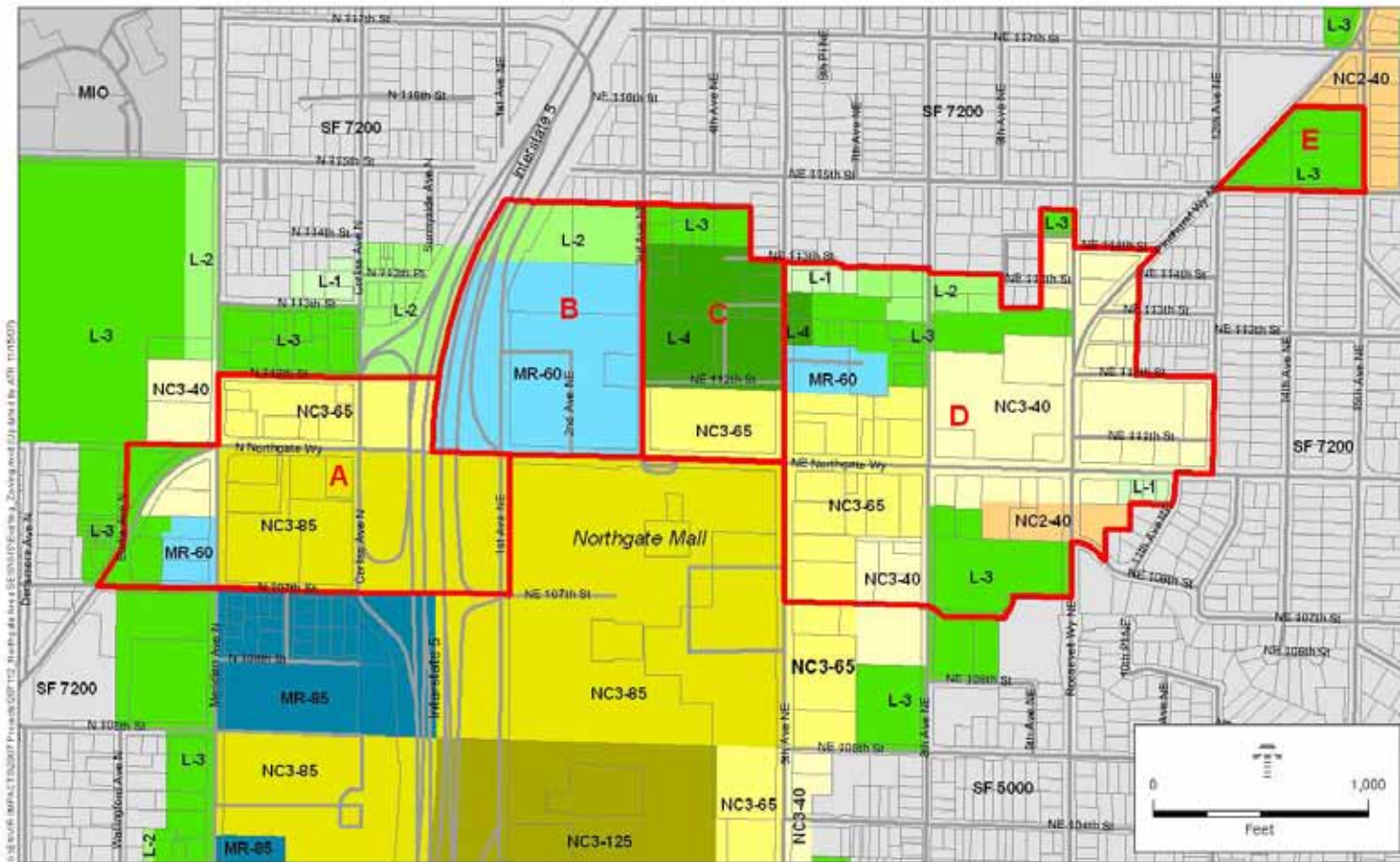
2.5.3.2 Alternative 1: Broad Rezone

The Broad Rezone Alternative (Alternative 1) is a set of legislative rezones that would occur across the full extent of the Northgate Way corridor, from approximately Meridian Avenue on the west to 12th Avenue NE on the east. (See the note to Table 2-4 regarding sub-area E). The theme and intent of this rezone approach is to increase capability for infill development consistently across the broad study area. This is meant to ensure that properties are efficiently used and not underbuilt when future market-driven development occurs. Underbuilding might compromise the area's growth potential and the likelihood of developing a walkable and diverse Urban Center.

Rezoning under Alternative 1 is shown in Figure 2-4 and the potential amount of development that could occur is shown in Table 2-3. Table 2-4 describes the zoning changes under the Broad Rezone for each subarea. All properties within the study area would generally increase one increment in density or height, relative to existing zoning. NC3-65 properties, for example, would be rezoned to NC3-85. Also, certain Midrise (MR) zoned properties would be rezoned to Neighborhood Commercial 3 (NC3), a change that would broaden the range of permitted uses and provide the potential for more retail activity in mixed-use buildings.

Exceptions to this general approach would occur for several sub-areas, as shown in Table 2-4, to reflect parcel size, location, development potential, and/or adjacent land use (e.g., for parcels adjacent to the proposed park or residential uses).

To account for the range of development that is possible in zones that allow mixed-use (e.g., NC3), Alternative 1 includes two different land use scenarios -- one emphasizing housing, and the other emphasizing commercial development. The residential focus scenario (Scenario A) assumes that mixed-use properties are developed 75 percent for residential use and 25 percent for commercial use, while the commercial focus scenario (Scenario B) assumes 80 percent commercial (60 percent office, 20 percent retail), and 20 percent residential development. The broad rezone could include other uses, including new or expanded hotel uses, restaurants, or entertainment uses, but the combination of office and retail would generally be expected to contribute more traffic to the peak hour period than other uses, and was therefore assumed for the traffic analysis.



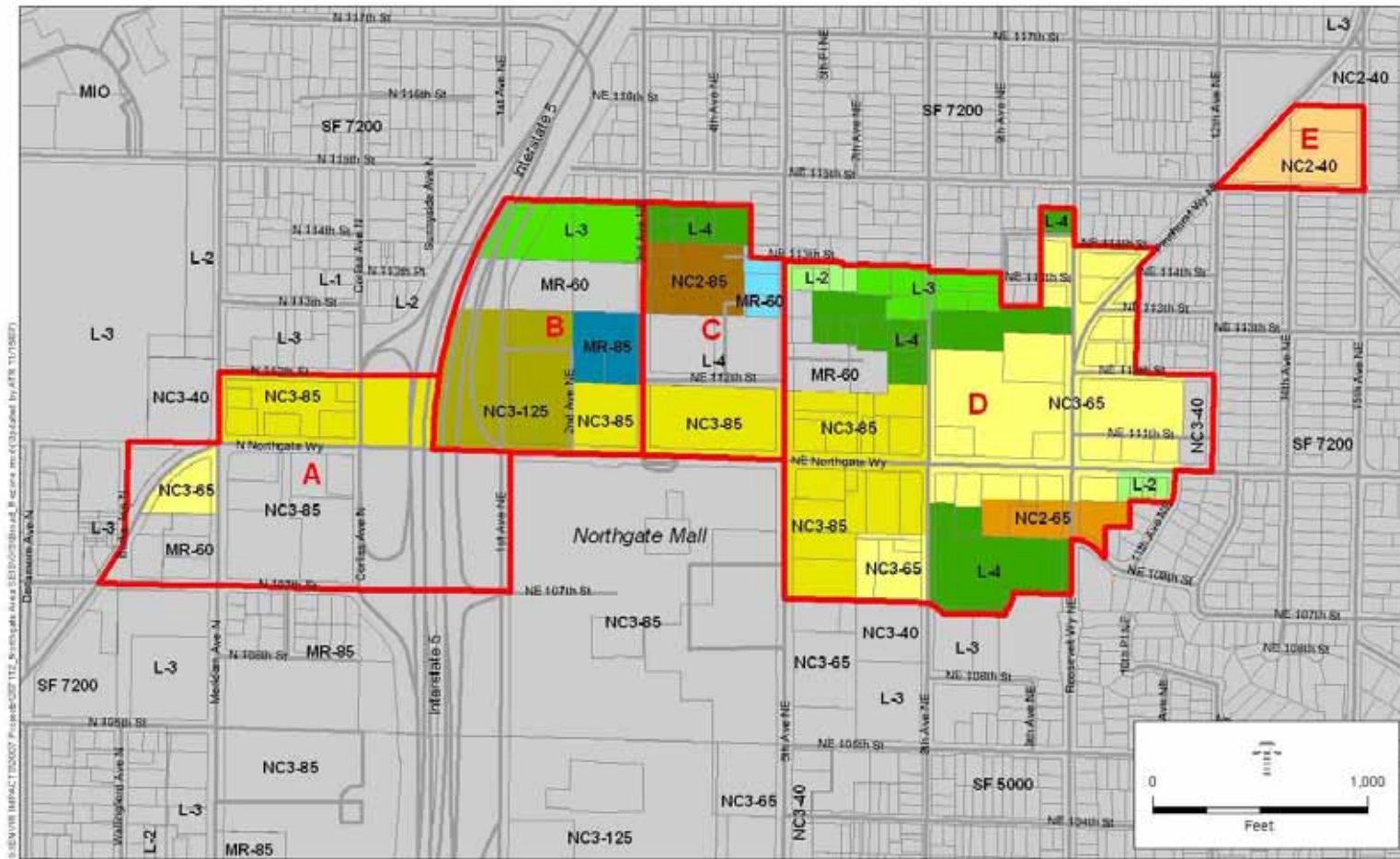
SOURCE: King County 2004, 2008, Seattle 2006, 2007

Northgate Urban Center Rezone EIS

Figure 2-3
Existing Zoning in the
Northgate Rezone Study Area
Seattle, Washington

Legend

- | | | | | |
|-----------------------------------|------------------------------------|-----------|--------------------------|------------|
| Neighborhood Commercial 2 - 85 Ft | Neighborhood Commercial 3 - 125 Ft | Lowrise 4 | Midrise 85 Ft | Study Area |
| Neighborhood Commercial 2 - 65 Ft | Neighborhood Commercial 3 - 85 Ft | Lowrise 3 | Midrise 60 Ft | Road |
| Neighborhood Commercial 2 - 40 Ft | Neighborhood Commercial 3 - 65 Ft | Lowrise 2 | Single Family 7200 Sq Ft | Parcel |
| Major Institution Overlay | Neighborhood Commercial 3 - 40 Ft | Lowrise 1 | Single Family 5000 Sq Ft | |



SOURCE: King County 2004, 2006, Seattle 2006, 2007

Northgate Urban Center Rezone EIS

Figure 2-4
Zoning for Alternative 1 - Broad Rezone
Seattle, Washington

Legend

Neighborhood Commercial 2 - 85 Ft	Neighborhood Commercial 3 - 125 Ft	Lowrise 4	Midrise 85 Ft	Study Area
Neighborhood Commercial 2 - 85 Ft	Neighborhood Commercial 3 - 85 Ft	Lowrise 3	Midrise 60 Ft	Parcel
Neighborhood Commercial 2 - 40 Ft	Neighborhood Commercial 3 - 65 Ft	Lowrise 2	Zoning Unchanged	Road
Neighborhood Commercial 3 - 40 Ft	Lowrise 1			

Table 2-4. Alternative 1 (Broad Rezone) Zoning Changes

<i>Subarea</i>	<i>Change in Zoning</i>
A	One increase in zoning height/intensity for the NC3-65 and NC3-40 zones. NC3-85, Lowrise-3 (L-3) and Midrise (MR) zones would not change
B	The Northgate Apartments property would be rezoned NC3-85, and NC3-125 and MR-85. The MR-zoned parcels to the north would remain at MR, and Lowrise 2 (L-2)-zoned parcels would be rezoned to Lowrise 3 (L-3).
C	The Court at Northgate Property would be rezoned from L-4 to NC2-85 to encourage housing and small scale retail on the street level facing the park. The parcel to the south of the proposed park would be rezoned from NC3-65 to NC3-85. Midrise (MR) would be applied to the properties east of The Court at Northgate property. No change would occur for the park site. L-3 parcels would change to Lowrise-4 (L-4), and the sole NC3-65 site would change to NC3-85.
D	Generally, one increase in zoning height/intensity. No change would occur for the MR parcel adjacent to the park, and L-1 zoned parcels would be zoned L-2, L-2 zoned parcels would be zoned L-3, and L-3 parcels would change to L-4.
E*	All parcels would be rezoned to Neighborhood Commercial 2 with a 40-foot height limit (NC2-40), to match the adjacent zoning to the north and east.

* Note: Subarea E was included in the analysis but was later found to have been misidentified as an area that the community supported including in the rezone study. This sub-area is also outside the designated Urban Center and is not expected to be included in a final proposal to the City Council.

2.5.3.3 Alternative 2: Focused Rezone

The Focused Rezone Alternative (Alternative 2) is a set of legislative rezones that would occur across a smaller area than Alternative 1, concentrated on properties east of I-5 and west of Roosevelt Way. The rezones proposed under Alternative 2 would also be to less intensive zones than in Alternative 1 in the area between I-5 and 5th Avenue NE. The intent of this rezone alternative is to moderately increase capability for infill development in key portions of the Northgate Way corridor. This would help achieve Comprehensive Plan and neighborhood planning objectives similar to Alternative 1 but with a lesser degree of change.

Rezoning under Alternative 2 is shown in Figure 2-5. Table 2-5 summarizes the changes to zoning under Alternative 2.

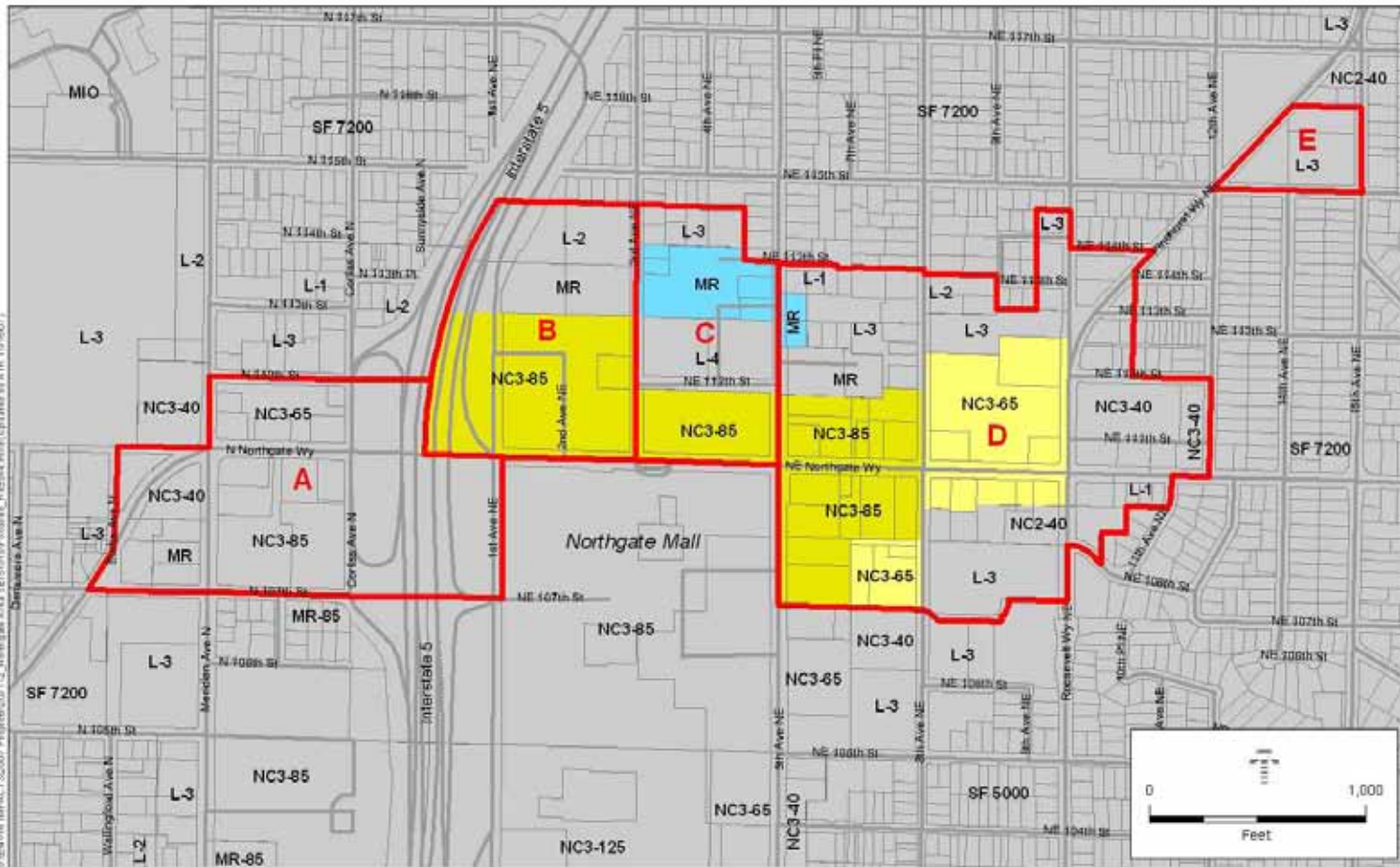
Table 2-5. Alternative 2 (Focused Rezone) Zoning Changes

<i>Subarea</i>	<i>Change in Zoning</i>
A	Not included in alternative
B	The Northgate Apartments property would be rezoned NC3-85. All other parcels would retain existing zoning.
C	L-4 parcels surrounding the proposed park would be rezoned to MR. The parcel to the south of the proposed park would be rezoned from NC3-65 to NC3-85. All other parcels would retain existing zoning.
D	NC3-65 would be rezoned to NC3-85. Parcels zoned NC3-40 that are west of Roosevelt Way NE would be rezoned to NC3-65. All other parcels would retain existing zoning.
E	Not included in alternative.

A portion of sub-area B would be rezoned to Neighborhood Commercial 3 with an 85-foot height limit (NC3-85). L-4 zoned parcels in Sub-area C would be rezoned to Midrise with a 60 foot height limit, and the NC3-65 parcel (Northgate North shopping center) would be rezoned to NC3-85. Sub-area D would generally be zoned the same as in Alternative 1 and discussed above. To help create and maintain a transition to single-family neighborhoods bordering the urban center/study area, however, the Lowrise-zoned parcels on the edge of the study area would not be rezoned.

Sub-area A, located west of I-5, would not be rezoned in this scenario. Analysis in the CTIP EIS, and preliminary analysis for this Draft EIS, indicated that the Northgate Way/Meridian Ave intersection would decrease in peak hour performance to LOS F. Analysis in the CTIP indicated that an additional left turn lane would be needed to improve operations. However, the existing right-of-way is insufficient and condemnation of property would be required to expand the intersection. The necessary property is developed with a recent structure, and condemnation costs would be prohibitive. Improvement to this intersection was not included in the CTIP for this reason.

Properties in Sub-Area E, at Pinehurst Way and NE 115th Street, would also not be rezoned. These properties are currently outside the Comprehensive Plan’s designated Urban Center.



SOURCE: King County 2004, 2006, Seattle 2006, 2007

Northgate Urban Center Rezone EIS

Figure 2-5
Zoning for Alternative 2 - Focused Rezone
Seattle, Washington

Legend

- | | | | | |
|-----------------------------------|------------------------------------|-----------|------------------|------------|
| Neighborhood Commercial 2 - 85 Ft | Neighborhood Commercial 3 - 125 Ft | Lowrise 4 | Midrise 85 Ft | Study Area |
| Neighborhood Commercial 2 - 65 Ft | Neighborhood Commercial 3 - 95 Ft | Lowrise 3 | Midrise 60 Ft | Road |
| Neighborhood Commercial 2 - 40 Ft | Neighborhood Commercial 3 - 65 Ft | Lowrise 2 | Zoning Unchanged | Parcel |
| Neighborhood Commercial 3 - 40 Ft | Lowrise 1 | | | |

2.5.3.4 Final EIS Alternative 3: Urban Design Framework

Final EIS Alternative 3 is a set of rezones that are assumed to be implemented through subsequent “contract rezone” proposals submitted separately by private property owners and developers; a legislative rezone could be considered for this alternative, but it is not assumed to occur. This alternative assumes intensity and height limits would be established for potential rezoning, and these limits are evaluated in this EIS. Such limits could be established through reference to the Alternative 3 zoning map in the FEIS (Figure 2-6) and/or pursuant to a resolution adopted by the City Council. The existing incentive zoning program (SMC 23.58A), which provides a bonus program for projects greater than 85 feet in height, would be referenced by Land Use Code changes to be proposed at a later date, and is assumed to apply to zones established by possible future individual rezone actions.

The rezone area for Alternative 3 is smaller than Alternative 1 but larger than Alternative 2. Alternative 3 includes areas west of I-5 and extends to Roosevelt Way NE on the east. The potential zones that could be achieved under Alternative 3 would allow taller and more intensive buildings than either Alternatives 1 or 2 on properties in the central portion of the study area between I-5 and Roosevelt Way NE. The theme and intent of Alternative 3’s approach is to concentrate more future development potential in this central area and to limit development potential in other nearby edge areas. The edge areas are generally zoned L-2 and L-3 at present and would remain unchanged in Alternative 3 to help to create gradual transitions in building height to single family residential neighborhoods adjacent to the Urban Center.

Potential contract rezoning under Final EIS Alternative 3 shown on Figure 2-6 is summarized in Table 2-6.

Table 2-6. Alternative 3: Urban Design Framework Zoning Changes ¹

<i>Subarea</i>	<i>Change in Zoning</i>
A	Properties west of I-5, between N. 112 th Street and N.107 th Street, would be rezoned to NC3-125. An area west of Meridian Ave adjacent to N. Northgate Way would be rezoned to MR-60, consistent with the parcel to the south. Parcels currently zoned L-3 on the border of the study area would not be rezoned.
B	Sub-area B would be rezoned using 3 different designations, reflecting the context of this large parcel: NC3-160 would apply to the western portion of the property, adjacent to I-5, and NC3-125 would apply to the eastern portion. MR-85 would apply to the northern portion of the sub-area. Existing L-2 zones to the north, on the boundary of the study area would not be rezoned.
C	An existing L-4 zoned parcel north of the new park would be rezoned to MR-85. Other L-4 and NC3-65 zoning south and west of the park, and L-3 zoning on the northern end of sub-area B, would not be changed.
D	NC3-65 parcels would be rezoned to NC3-85 north of NE Northgate Way, and NC3-125 south of NE Northgate Way, adjacent to the Northgate Mall. Parcels north of NE 112 th Street currently zoned MR-60, L-3 and L-4 would be rezoned MR-85. L-2 parcels would not be changed. One L-1 parcel would be rezoned L-2. NC-zoned parcels on the block between 8 th Ave NE and Roosevelt Way would be rezoned to NC3-85, NC3-125 and NC3-65 north of NE Northgate Way and NC3-85 south of NE Northgate Way. L-3 and L-2 zoning would be retained at the north and south boundaries of the sub-area. The area east of Roosevelt Way NE and Pinehurst Way would not be rezoned.
E	These parcels are located outside the designated Urban Center and are not included in Alternative 3.

1. The zoning changes listed in Table 2-6 summarize the maximum heights and intensities assumed for future contract rezone proposals and evaluated in the EIS.

In general, compared to the other alternatives, Final EIS Alternative 3 would create the potential for taller/more intensive buildings (NC3-125) on a greater number of parcels in sub-areas A, B, and D. One parcel adjacent to I-5 in Sub-Area B could be rezoned to NC3-160. However, L-2 and L-3 zoned parcels at the edges of the study area would not be rezoned; this is intended to create a buffer and transition that is more responsive to existing single family residential neighborhoods on the border of the Urban Center. In Sub-Area C, the Northgate North shopping center south of the new park would retain its existing zoning to avoid potential shadow effects identified in the analysis of some of the other alternatives. Parcels located east of Roosevelt Way NE in Sub-Area D and all of Sub-Area E would not be rezoned in this alternative. The growth potential created by Final EIS Alternative 3 is shown in Table 2-3.

2.5.4 Implementation Programs

The City is developing several implementation programs that would help mitigate the effects of additional height and intensity, accomplish key physical improvements in the Northgate Urban Center and implement the broader goals of the Northgate Neighborhood Plan. The improvements have been identified in past planning efforts as important to reinforce and improve the physical environment. Examples include:

- Encouraging the realization of enhanced streets, pedestrian and bicycle networks;
- Additional open spaces and improved streetscapes integrated into public and private development projects;
- Expanded affordable housing opportunities.

These implementation tools are part of larger, ongoing efforts supporting Northgate revitalization that are moving forward independent of the Northgate Rezone alternatives. They could be implemented in conjunction with any of the EIS alternatives, including No Action. They would be achieved through various means, including future possible contract rezone decisions, policy-setting, design review, revised infrastructure standards, and other public and private actions related to property development. The programs would be established through both legislative and administrative actions. Elements of these programs, which are still being developed, include the following:

- The Northgate-specific Design Guidelines would be revised to address topics such as pedestrian connections across private property, transit-friendly improvements, bicycle infrastructure, and creating an appropriate transition at the edge adjacent to Hubbard Homestead Park. The Guidelines would be applied in conjunction with review of future development proposals.
- Incentive zoning provisions specific to Northgate would be proposed consistent with the program established in SMC 23.58A. In addition to the provision of affordable housing to obtain a bonus, additional components of a bonus program for Northgate could include mid-block pedestrian promenades, enhanced pedestrian amenities, bicycle improvements, public plazas, childcare facilities and sustainability features.
- The Northgate Overlay District (SMC 23.71) would be amended to authorize an open space fund, and revise other development standards.
- SDOT's right-of-way improvements manual would be amended administratively to include guidance for streetscape improvements, including the 3rd Avenue NE Green Street and potential 8th Avenue NE Green Street.

In addition, a Comprehensive Plan amendment was proposed in 2009 and is currently scheduled to be considered by the City Council in March 2010. The amendment expresses support for future rezones as a means to achieve Northgate objectives.

CHAPTER 3 ADDITIONAL ANALYSIS: IMPACTS AND MITIGATION MEASURES FOR ALTERNATIVE 3- URBAN DESIGN FRAMEWORK

As stated in Chapter 2, the rezones under consideration would not have any direct effects on the environment, since they only involve potential changes to zoning designations and the land use code. However, future development or redevelopment of these sites consistent with the new zoning would generate impacts on the environment and other resources, and those potential impacts could change as a result of the rezone.

The affected environment section in the Draft EIS (Chapter 3) describes existing conditions in the study area. Those conditions have not changed substantially and that information is not repeated in the Final EIS. This section of the Final EIS discusses only the impacts of Alternative 3- Urban Design Framework, described in Chapter 2. Impacts of the other rezone alternatives are summarized in Chapter 1 of this document, and described in detail in Chapter 4 of the Draft EIS.

For the various resource areas discussed below, unless specifically stated otherwise, the impacts would be the same across all subareas.

3.1 Land Use

The land use analysis included in this Final EIS (FEIS) discusses changes in land use expected to occur under Alternative 3 and potential impacts associated with these expected land use changes. The analysis focuses primarily on land use conflicts, transitions between zones, and changes in the overall pattern of land use. Consistency with applicable policies is also discussed.

The development assumptions used in this analysis, as for the Draft EIS, were based on City staff analysis of typical development in the zones affected and properties likely to redevelop, and on input from a real estate consulting firm, Heartland, which examined conditions in the Northgate area. The assumptions are generalized and are not intended to limit the types of development that would be allowed. Please refer to Appendix A of the Final EIS for additional information about development assumptions.

3.1.1 Land Use Impacts

3.1.1.1 Alternative 3 - Urban Design Framework

Similar to the other rezone alternatives considered in the Draft EIS, key objectives of Alternative 3 are to concentrate a diverse mix of land uses at increased densities along Northgate Way, in the heart of the Urban Center, and to increase the development of housing. Concentrating growth in a compact area in this manner, within walking distance of transit, can reduce individual auto travel and increase pedestrian travel. The potential to achieve increased development capacity through rezoning, whether by individual contract rezones or legislative rezoning, would help to attract development to the Urban Center. Alternative 3, like the other rezone alternatives, assumes that growth will be attracted primarily from other portions of the larger Northgate area.

The overall development capacity created under Alternative 3 would be very similar to Alternative 1A. Alternative 3 would create capacity for approximately 4,157 new residential units compared to 4,064 under the Broad Rezone Alternative 1A. It would result in approximately 954,443 square feet of commercial space and 2,527 jobs; compared to approximately 1,023,737 square feet and 2,711 jobs under the Broad Rezone Alternative 1A. As such, impacts are generally expected to be similar as well. Capacity would increase in nearly all sub-areas relative to the No Action Alternative. The major exception would be Subarea C, where neither the No Action nor Alternative 3 would create additional capacity for commercial development, beyond a limited amount allowed on the ground floor in the Midrise zone. Note that Subarea E is not included in Alternative 3.

The configuration and intensity of potential rezones is different, however. The Alternative 3 rezones would allow taller and more intensive buildings focused along Northgate Way in some locations. One site would allow buildings up to 160 feet, and a greater number of parcels could be developed up to 125 feet. While buildings of this height would be significantly taller than adjacent buildings, they would not be greater in bulk because of limitations in the applicable NC-3 zoning designations. Differences between impacts of the alternatives will be more evident at the subarea level, and these differences are discussed below for individual subareas. While Alternative 3 assumes that rezoning would occur through individual contract rezone proposals, rather than through legislative rezones, the land use impact analysis does not distinguish between these procedures. Development of the identified types and intensities are assumed to occur regardless of the rezone process used.

Similar to the other EIS alternatives, rezoning would likely result in non-conformities that could limit the ability of some properties to redevelop. Nonconforming buildings can generally remain as legal structures, but the land use code places restrictions on how such buildings can be expanded or modified. In the Northgate Rezone Study Area, such non-conformity is most likely for properties where the zoning would change to NC from a multi-family designation.

As with the other rezone alternatives, it is possible that growth under Alternative 3 could exceed the growth targets set for Northgate in the City's Comprehensive Plan. This could occur even without rezoning because the Northgate Urban Center currently has more capacity for development than is needed to accommodate the growth target. As noted above, the rezones are not motivated by a need to increase growth capacity; rather, the intent is to help guide and shape the location and form of growth in the Urban Center. Development under Alternative 3 may be somewhat more likely to exceed growth targets, however, because Alternative 3 could give more properties an incentive to seek contract rezones to achieve increased development capacity.

If growth were to exceed the planning targets, the City may need to reexamine its priorities for infrastructure to serve the area. However, the growth targets in the Comprehensive Plan were based on regional growth trends that are in turn based on long-term regional population change rates, migration patterns, transportation planning, and employment trends. These trends are not likely to be altered by changes in zoning in a small portion of the Northgate Urban Center. Thus the likelihood that growth in the Northgate planning area would exceed the targets considered in this analysis is low.

Under Alternative 3, properties eligible for rezoning would redevelop with a mix of 75 percent residential use and 25 percent commercial use. This scenario would result in capacity for a net increase of 4,189 residential units within the study area, which is 44 percent greater than the capacity under the No Action Alternative. This additional density and residential population when developed would likely increase demand for everyday goods and services and thus could encourage the growth of businesses to serve the immediate neighborhood, rather than the destination retail stores that currently predominate. There would also be an increase in capacity for commercial development, which could accommodate approximately 2,527 net new jobs in approximately 954,443 square feet of net new commercial space.

According to the maximum development and growth assumptions for 2024 in this analysis, Alternative 3 could result in 44 percent more new housing units in the Northgate Urban Center than currently anticipated in the comprehensive plan. As an indirect result, one of the expected impacts is that some areas outside of the Northgate Urban Center Rezone study area could grow more slowly than assumed under the No Action Alternative. Additional growth would likely reduce demand for multifamily development outside of the Northgate Urban Center.

Subarea A. In Subarea A, Alternative 3 would create capacity for approximately 2 percent of the employment growth and 11 percent of the residential growth anticipated for the Northgate Urban Center through 2024. Residential growth would be similar to that expected under the Broad Rezone Alternative 1A, but employment growth would be greater (11 vs. 4 percent).

Alternative 3 is generally similar to Alternative 1A in Subarea A and impacts to the overall land use pattern are expected to be similar and not significant. The major exception is that Alternative 3 would allow higher buildings on the lots between Meridian Ave N and Corliss Ave N. The NC3-65 and NC3-85 zoned parcels in the center of the sub-area would be rezoned to NC3-125; much of the increase in density is assumed to be either residential or hotel use. However, as noted in the DEIS, the property south of Northgate Way is considered unlikely to redevelop. Therefore, on the lots north of Northgate Way density could be greater than under the No Action and Alternative 1A.

Subarea B. In Subarea B, Alternative 3 would create capacity for approximately 22 percent of the employment growth and 35 percent of the residential growth anticipated for the Northgate Urban Center through 2024. L-2 and MR-60 zoning would remain in place adjacent to I-5, but would be replaced with neighborhood commercial (NC3-160 and NC3-125) zoning between 1st Ave NE and 3rd Ave NE (one of Northgate's opportunity sites). Alternative 3 would allow greater heights in this area than the Broad Rezone Alternative 1A, and would create approximately 30 percent more residential capacity and 40 percent more commercial capacity.

Rezoning would allow a change from a residential only to a mixed-use land use pattern. Mixed-use development would likely include ground floor commercial that would face adjacent streets and internal roads. The area adjacent to Hubbard Homestead Park to the east of 3rd Ave NE would be rezoned to NC-125, which would allow relatively high (125 feet) mixed use buildings. The uses anticipated within the subarea would generally be compatible with the park and surrounding uses. Some potential would exist for minor conflicts (e.g. noise, odors) from commercial activities within mixed use developments. Project-specific impacts would be evaluated at the time of project review.

Some of the northern portion of the subarea would be rezoned to from L-2 to MR-85 with a portion remaining L-2. This zoning would allow slightly greater densities. However, as stated in the DEIS, these parcels are not expected to redevelop in the next 25 years because existing development on these lots is in good condition and the increase in development capacity from the rezone is not likely significant enough to encourage redevelopment. Land use changes in this portion of Subarea B would be negligible.

Subarea C. In Subarea C, Alternative 3 would not create any additional capacity for employment growth. It would create capacity for approximately 5 percent of the residential growth anticipated for the Northgate Urban Center through 2024, however. Total capacity for housing under Alternative 3 would be greater than for all other rezone alternatives. Existing zoning in Subarea C consists of low-rise residential (L-3 and L-4) and neighborhood commercial (NC3-65). Under Alternative 3, the L-3 parcel would remain L-3 and is not considered likely to redevelop. The Northgate North (Target/Best Buy) site would remain zoned NC3-65 and is also unlikely to redevelop within the time horizon of this analysis.

The northern portion of the existing L-4 zone would be rezoned to MR-85, resulting in an increase in the potential number of residential units adjacent to the north boundary of Hubbard Homestead Park. Limited ground floor commercial uses are also allowed within the MR-85 zone. Redevelopment in this zone would likely be limited based on the size and condition of the existing development, but some infill or expansion would be possible, especially at the southeastern portion of this zone.

The addition of residential capacity within the subarea would be generally compatible with the new park. For The Court at Northgate property (one of Northgate's opportunity sites, discussed in Chapter 2), the design of any specific new development would need to consider potential impacts of such development on Hubbard Homestead Park, such as the impacts of an access road, provision for pedestrian movement, and privacy issues related to windows located near park areas. The addition of residential uses facing the park could also be beneficial to the park, by providing natural surveillance of the park.

Subarea D. In Subarea D Alternative 3 would create capacity for approximately 35 percent of the employment growth and 115 percent of the residential growth anticipated for the Northgate Urban Center through 2024. These percentages are similar to the Broad Rezone Alternative 1A. Rezoning would result in an overall increase in density and height in this subarea. However, unlike the Broad Rezone Alternative, the increase in density would be focused with greater height allowances along Northgate Way and west of Roosevelt Way. No zoning changes would occur for properties east of Roosevelt Way.

The land use character of this subarea could change substantially as a result of rezoning under any alternative, especially on larger parcels that currently host a large amount of surface parking. This is particularly true for Alternative 3, where current allowed heights of 65 and 40 feet could be increased to 125 feet. Mixed-use structures would introduce residential uses into an area predominated currently by destination retail stores and services. Redevelopment could also add more neighborhood oriented commercial uses to the mix, rather than merely replacing destination retail uses. As discussed above, mixed-use development has some potential to introduce land use conflicts between residents and commercial users, which would need to be

addressed at the project level. In the context of the overall land use pattern, these changes are generally considered to be positive and not adverse; the impacts of increased height and bulk are discussed further in subsection 3.3, Aesthetics.

3.1.2 Plans and Policies

This sub-section of the Final EIS contains a revised discussion of the relationship of the Northgate Urban Center Rezone alternatives to major goals and policies of the City of Seattle Comprehensive Plan. It has been updated since the Draft EIS to address the impacts of Alternative 3. The focus is on policies that are related to the type, amount, location and form of growth occurring in Urban Centers generally and within the Northgate Urban Center particularly; these factors are considered most relevant to the rezone alternatives. In general, Alternative 3 and all of the rezone alternatives would be consistent with applicable policies. A discussion of the relationship of growth in the Urban Center to neighborhood plan policies for Aurora-Licton, Broadview – Bitter Lake – Haller Lake, and to Master Plans for North Seattle Community College and Northwest Hospital – is contained in the CTIP Draft EIS (Seattle Department of Transportation, 2006).

City of Seattle Comprehensive Plan

Summary: The City of Seattle’s *Comprehensive Plan – Towards a Sustainable Seattle*, contains goals and policies designed to guide growth within the City for the next 20 years. The *Comprehensive Plan* is comprised of eleven elements and is based upon a development pattern called the “urban village strategy.” This strategy directs most of the City’s new household and employment growth to 2024 (approximately 58 percent of residential growth and 73 percent of employment growth) into designated urban centers. The *Comprehensive Plan* designates six urban centers, one of which is Northgate. The rezone study area encompasses a portion of the Northgate Urban Center. Major goals and policies related to urban centers, land use and the Northgate neighborhood are summarized below.

Urban Village Element

Goal UVG4 – Promote densities, mix of uses, and transportation improvements, that support walking and use of public transportation, especially within urban centers and urban villages.

Policy UV1 – Promote the growth of urban villages as compact mixed-use neighborhoods in order to support walking and transit use, and to provide services and employment close to residences.

Goal UVG6 – Accommodate planned levels of household and employment growth. Depending on the characteristics of each area, establish concentrations of employment and housing at varying densities and with varying mixes of uses.

Goal UVG8 – Accommodate the City’s existing and future housing needs through maintenance of existing residential neighborhoods and the creation of new residential neighborhoods...

Goal UVG9 – Use limited land resources more efficiently and pursue a development pattern that is more economically sound, by encouraging infill development on vacant and underutilized sites, particularly within urban villages.

Goal UVG10 – Maximize the benefit of public investment in infrastructure and services, and deliver those services more equitably, by focusing new infrastructure and services, as well as maintenance and improvements to existing infrastructure and services, in areas expected to see additional growth, and by focusing growth in areas with sufficient infrastructure and services to support that growth.

UVG11 – Collaborate with the community in planning for the future.

UVG16 – Provide parks and open spaces that are accessible to urban villages to enhance the livability of urban villages, to help shape the overall development pattern, and to enrich the character of each village.

UVG17 —Guide public and private activities to achieve the function, character, amount of growth, intensity of activity, and scale of development of each urban village consistent with its urban village designation and adopted neighborhood plan.

UVG35 – Achieve growth in urban centers...that is consistent with the 20-year residential and employment growth targets...

UVG36 – Achieve development within urban villages at a pace appropriate to current conditions in the area.

Policy UVG40 – Use 20-year growth targets for urban villages as a tool for planning for the growth that may occur. Use these targets as a guide for City plans for development and infrastructure provision. Recognize that the growth targets do not represent the maximum amount of growth that could occur in a village...

Discussion:

All of the rezone alternatives are intended to allow a modest increase in density within the rezone area, to encourage a broader mix of uses on selected parcels, and to help focus a greater amount of Northgate’s growth within the commercial core of the Urban Center. Accommodating growth in this location and in this manner would be consistent with the City’s Urban Village strategy. Higher densities would be focused in a relatively compact area that is adjacent to existing and planned regional transit facilities, and within walking distance of a wide range of retail and community services. (UVG4, UV1)

With or without rezoning, the Urban Center has sufficient zoned development capacity to accommodate Northgate’s population and employment targets. Rezoning, in conjunction with the City’s adopted incentive zoning program, is intended to stimulate the production of housing – which is lagging behind growth in jobs within the Urban Center (UVG6, UVG8). As indicated in Table 2-3, Alternative 3 would provide the greatest potential for additional residential units among the rezone alternatives.

The rezone is also intended to stimulate redevelopment of underutilized parcels adjacent to Northgate Way – including several large “opportunity sites” - as a means to increase densities and use existing land resources more efficiently. Focusing growth within this area along Northgate Way within the Urban Center would also use existing infrastructure more efficiently. The Northgate CTIP includes numerous planned improvements that are designed to support Northgate’s planned growth, move people safely and efficiently, reduce drive-along travel, and protect residential neighborhoods. (UVG9, UVG10) Alternative 3 identifies several additional regulatory changes and programs that would reduce drive-alone travel and promote pedestrian activity.

As noted in the Project Description (B.5), the rezone is based on concepts articulated by a community design charrette, one of which was to consider increasing density and height in the Northgate Way corridor. (UVG11) Alternative 3 was developed in response to issues identified in the Draft EIS and preferences articulated at a community workshop in November 2008, and the continued planning efforts of the City staff.

Construction of Hubbard Homestead Park commenced in November, 2009 on the former Metro park-and-ride lot, located along Northgate Way between 3rd and 5th Avenues. This parcel is strategically located within the commercial core of the Northgate Urban Center. The EIS evaluates potential impacts to park use of this site in connection with land use changes and possible shadows (UVG16).

The Urban Center Rezone is intended to guide a portion of Northgate’s future growth to the Northgate Way corridor. This refocusing of growth would increase the intensity of activity and scale of development, and would broaden the mix of uses within the study area. The EIS explores alternatives for accomplishing those objectives consistent with City policy. (UVG17)

Based on real estate market information that was used to help inform the rezone alternatives, and based on evaluation of properties considered likely to develop in the study area over time, growth within Northgate as a result of rezoning, whether by legislative action or individual contract rezones, is anticipated to remain within the current 20-year growth targets (UVG35). Refer to Final EIS Tables 2-2 and 2-3 for applicable growth targets and estimates, respectively.

As discussed in the EIS, however, it is also possible that the stimulus provided by the rezone could attract a greater than anticipated amount of growth, or accelerate the rate of growth (UVG36). It is assumed that the City would identify this situation, if it occurred, through its ongoing monitoring of city-wide growth. In general, the Comprehensive Plan’s growth targets are intended to be used as guides and do not establish limits. (UVG40) If a significant discrepancy between adopted growth targets and the rate or amount of growth did occur, the City could amend the Comprehensive Plan to adjust Northgate’s targets, and propose necessary changes to capital facility plans.

Land Use Element

LU3 – Establish rezone evaluation criteria and procedures to guide decisions about zones that will provide the best match for the characteristics of an area and will most clearly further City goals.

LU5 – 1. Consider, through neighborhood planning processes, recommendations for the revision of zoning to better reflect community preferences for the development of an area, provided that consistency between the zoning and this Plan is maintained. Consider relevant goals and policies in adopted neighborhood plans when evaluating a rezone proposal.

2. Seek opportunities to incorporate incentive programs for development of housing affordable to lower-income households into legislative rezones or changes in development regulations that increase development potential.

3. Consider development regulations that condition higher-density development on the provision of public benefits when such public benefits will help mitigate impacts of development attributable to increased development potential.

LU100 – Use a range of high-density multi-family zones in desirable pedestrian-oriented urban neighborhoods with access to regional transit, a broad range of services and amenities and access to employment to:

- Encourage housing development of a medium to large scale with heights greater than those in Lowrise zones;
- Accommodate larger scale structures while maintaining the livability of these communities, including measures which minimize the appearance of bulk;
- Allow high-density residential development in urban centers...

LU105 – Designate as mixed-use commercial areas, existing areas that provide locations for accommodating the employment, service, retail and housing needs of Seattle’s existing and future population. Allow for a wide range in the character and function of individual areas consistent with the urban village strategy.

Discussion:

The EIS rezone alternatives are assessing the potential effects of applying various zones and increases in intensity to help determine how best to satisfy the City’s adopted zoning criteria and accomplish the objectives of the Comprehensive Plan. General rezone criteria are set forth in SMC 23.34.008 and include, but are not limited to, the following:

- providing sufficient capacity in Urban Centers to accommodate adopted growth targets;
- closely matching the locational criteria for the proposed zoning designation;
- examining previous and potential zoning changes in and around the rezoned area;
- minimizing the effect of more intensive zones on less intensive zones through gradual transitions, including heights;

- using physical buffers (e.g., natural features, freeways and arterials, open space) to separate different uses and intensities of development; and
- considering physical buffers and platted lot lines when establishing zoning boundaries, and orienting commercial uses to face each other and away from adjacent residential areas.

Other general rezoning principles which should be considered include:

- possible negative and positive impacts from rezoning to housing, public services, environmental resources, pedestrian safety, employment and the character of areas with architectural or historic value;
- shoreline views and access;
- anticipated service capacities of the area (streets, transit, parking and utilities);
- the presence of changed circumstances, which is not required for a rezone;
- the presence of critical areas; and
- the purpose and boundaries of any applicable zoning overlay district.

All of the rezone alternatives except No Action would increase development capacity on affected properties within the rezone study area (along the Northgate Way corridor); that is a stated objective of the City's action. The increase in capacity for the various alternatives is shown in Table 2-3. The relationship of the alternatives to zoning locational criteria is discussed further below. The EIS discussion of Land Use patterns acknowledges that the rezone could potentially stimulate additional growth through legislative or contract rezones and/or through market forces. It also discusses compatibility between uses of different intensity; the rezone alternatives generally incorporate transitions between zones of different intensity. Final EIS Alternative 3 directly addresses transition issues, and would reduce potential impacts to residential properties, associated with the other rezone alternatives. Natural physical buffers and critical areas are either not present or not extensive in the study area. Commercial uses would generally be oriented to Northgate Way and away from lower density residential uses along the boundary of the study area. In reference to other general rezoning principles, the EIS evaluates the potential impacts of the rezone alternatives to those elements of the environment included in the EIS scope.

As noted previously, the proposed rezone study area was developed with the input of the Northgate Stakeholders Group. Direction from the community design charrette and Stakeholder Advice Memo – specifically to focus additional growth along Northgate Way and to consider building heights up to 125 feet – was used to guide initial rezone alternatives. (LU5) Alternative 3 is responsive to issues identified in the Draft EIS and at a community workshop held in November, 2008, as well as follow up planning analysis by City staff. All EIS alternatives assume implementation of the City's adopted incentive zoning program in conjunction with future rezones.

The rezone alternatives include application of high-density multi-family and mixed-use commercial designations. An additional increment of development would be guided to the Northgate Way corridor; overall, Urban Center growth is expected to remain within the Northgate growth targets. Previous EISs prepared for the Comprehensive Plan, Northgate Neighborhood (NACP) and CTIP have not identified deficiencies in infrastructure or service capacity within the Urban Center.

Northgate Neighborhood Goals and Policies

Summary: Policies from the 1993 *Northgate Area Comprehensive Plan* (NACP) are now incorporated into the Seattle Comprehensive Plan's *Neighborhood Plan* element. The Northgate policies are designed to transform the Northgate area into a thriving mixed-use center of concentrated development and to support a vibrant community that contains good transit service, roads, parks, libraries, play fields, retail shops, open spaces, pedestrian facilities, adequate drainage and several community and human services.

NG-G1 – A place where people live, work, shop, play and go to school – all within walking distance.

NG-G2 – A thriving, vital, mixed-use center of concentrated development surrounded by healthy single-family neighborhoods transformed from an underutilized, auto-oriented office/retail area.

Discussion:

To varying degrees, the rezone alternatives are all intended to modestly increase the intensity of development, and the amount of residential development, occurring within the Northgate Urban Center. These changes would promote a greater local balance of population and employment. Recent City-initiated projects – such as the library, park and community center -- have provided some important elements of a balanced, self-sufficient community. Currently, the Northgate Way corridor is predominantly low-rise in scale and auto-oriented in character. A greater diversity of more intensive land uses would further the goal of creating a vital, mixed-use center. Rezoning would, overall, assist and continue the desired transformation of the Urban Center. (NG-G1, NG-G2) Alternative 3 would create the largest potential for additional residential units and would help to achieve a relative balance of population and employment.

Land Use & Housing

Goal NG-G3 – The surrounding single-family neighborhoods are buffered from intense development in the core, but have ready access to the goods, services, and employment located in the core via a range of transportation alternatives including walking, bicycling, transit, and automobile.

NG-G4 – The most intense and dense development is concentrated within the core.

NG-P1 – Encourage development of the core as a major regional activity center for retail, commercial, office, multifamily residential, and educational uses with densities sufficient to support transit.

NG-P2 – Use land use regulation to cause new development to locate close to transit stops and provide good pedestrian and bicycle connections throughout the area so that intra-area vehicular trips and locally generated traffic are reduced.

NG-P4 – Concentrate employment activity where the infrastructure and transportation system can best accommodate it.

NG-P5 – Promote a mixture of activities including commercial and residential uses in areas that have Neighborhood Commercial and Residential Commercial zoning designations.

NG-P6 – Promote additional multi-family housing opportunities for households of all income levels to the extent that a compatible scale and intensity of development can be maintained with adjacent single family areas.

NG-P7 – Reduce conflicts between activities and promote a compatible relationship between different scales of development by maintaining a transition between zones where significantly different intensities of development are allowed.

NG-P8 – Maintain the character and integrity of existing single family areas by maintaining current single family zoning.

Discussion:

The rezone study area is located within the commercial core of the designated Northgate Urban Center, with the exception of the parcels along Pinehurst Way NE (in Alternative 1). Rezoning would encourage more intensive redevelopment of commercial and multi-family uses within a portion of the Urban Center core (NG-G4, NG-P1, NG-P5). One objective of the rezone is to encourage more multi-family housing in the Urban Center, and to provide a better balance to employment activity. (NG-P6) Alternative 3 would provide more capacity for added housing and a better balance of uses relative to the other rezone alternatives. The permitted intensity of development would step down on the borders of the study area to provide a transition and buffer for adjacent single family neighborhoods. (NG-G3, NG-P7) The transition would be more pronounced in Alternative 3 compared to the other alternatives. The EIS sections on Land Use and Aesthetics discuss potential conflicts and incompatibilities as a result of increasing the intensity of land use. (NG-P7) None of the rezone alternatives propose any changes to existing single family zoning, and no significant impacts to adjacent single family neighborhoods is anticipated (NG-P8)

The Urban Center core, including the rezone area, is located within walking distance of existing and planned transit facilities. The Northgate CTIP includes a balanced program of multi-modal transportation system improvements which are intended to provide options to and reduce drive-alone trips. Alternative 3 includes an assumed emphasis on pedestrian travel. This would be accomplished through regulatory changes and other programs; these programs could be applied to any rezone scenario. The transportation analysis in this EIS indicates that CTIP improvements

can accommodate Alternative 2 (Focused Rezone) and Alternative 3 (Urban Design Framework) without significant reduction in level of service, but Alternative 1 (Broad Rezone) if built out would generate significant impacts on some intersections (NG-P4).

Transportation

NG-G6 – An economically viable commercial core with improved alternative means of access, good vehicular and pedestrian circulation, and an enhanced, interesting environment that attracts customers, visitors, and employers.

NG-G7 – Medium- to high-density residential and employment uses are concentrated within a 10-minute walk of the transit center, reducing the number and length of vehicle trips and making travel by foot and bicycle more attractive.

NG-P11 – Promote pedestrian circulation with an improved street level environment by striving to create pedestrian connections that are safe, interesting and pleasant.

Discussion:

Alternative 3 would be consistent with the Comprehensive Plan's Northgate Transportation policies. Please refer to the discussion in the CTIP Draft EIS (City of Seattle, 2006).

Open Space

NG-P15 -- Promote a system of open spaces and pedestrian connections, to guide acquisition, location and development of future open space and to establish priorities for related public improvements.

Discussion:

The City is constructing Hubbard Homestead Park on the former Metro park-and-ride facility located between 3rd Ave. and 5th Ave., adjacent to Northgate Way. It will provide a significant open space in the Urban Center. The CTIP includes several capital projects that are intended to improve pedestrian connections within the Urban Center (SDOT, 2006). The City's adopted incentive zoning program allows a portion of the zoning bonus for projects higher than 85 feet to be achieved through provision of open space, and this approach is also likely to be implemented through future rezones in this Northgate rezone study area. (NG-P15)

Financing

NG-P18 – Explore and seek to develop a variety of strategies for financing implementation of these goals and policies.

Discussion:

As described in Chapter 2, the City has adopted an incentive program that potentially applies to rezones city-wide, including in this Northgate rezone study area. It provides a means to

encourage provision of affordable housing, open space and other amenities, which would help achieve the Comprehensive Plan's Northgate goals and policies. A separate program has defined a Voluntary Transportation Mitigation Payment Program (VTMPP) for Northgate to help fund needed transportation improvements.

3.1.3 Mitigation Measures

Development under Alternative 3 would be consistent with the overall land use pattern encouraged for the Urban Center by the policies of the Comprehensive Plan. Although the degree of change could be substantial in some subareas, no significant adverse impacts to land use have been identified; therefore, no mitigation measures are required. The Seattle Municipal Code includes measures that would provide potential mitigation for some noise and odor impacts, both during construction and operation of development. Noise and odor impacts resulting from conflicting land uses -- such as residential uses located in close proximity to commercial activities -- would be further controlled through environmental review of individual projects, by examining specific uses, locations, project designs, and other factors that are beyond the scope of this analysis.

3.1.4 Significant Unavoidable Adverse Impacts

Anticipated land use impacts would be largely mitigated by land use regulations, and no significant incompatibilities between uses are expected. Similarly, no inconsistencies with adopted policies have been identified. Therefore, no significant unavoidable land use impacts are anticipated under Alternative 3.

3.2 Housing

Alternative 3 has the largest potential increase in housing among the EIS alternatives – 4,189 new housing units overall, and 1,827 units more than No Action. The increase would be only incrementally greater (125 more units) than Alternative 1A, and would affect the same existing housing as Alternative 1A. Therefore, impacts on housing would be generally the same as those described for Alternative 1A in the Draft EIS. Please see the Draft EIS for discussion of those impacts and mitigation measures.

3.3 Aesthetics

The elements of the visual environment considered in this analysis include:

- Overall visual character
- Streetscape character
- Protected scenic views
- Light and glare

- Bulk and scale of buildings
- Transition in scale between different zones
- Shade and shadows

The first four of these are considered together for the study area as a whole. The height, bulk, and scale of buildings allowed and the scale transitions between zones are analyzed by subarea. Finally, shade and shadow impacts are discussed by subarea, with specific attention to potential effects on Hubbard Homestead Park.

3.3.1 Impacts

Overall visual character

During the construction period associated with any new development or redevelopment, there would be temporary impacts to the visual environment, including the presence of construction equipment within the study area, stockpiled materials at the sites, and worker vehicles. Rezoning or the incentive for individual contract rezones could have the effect of speeding up the rate of redevelopment in the study area, resulting in construction impacts that are concentrated in a shorter period of time as well as closer together. These short term impacts are not expected to be significant, but would be further evaluated in detail as part of environmental review for each project.

Incremental redevelopment of the study area is ongoing and is expected to be accelerated by any of the rezone alternatives, with most new projects taking advantage of the maximum size of building allowed by the Land Use Code. Alternative 3 would allow taller buildings relative to the other alternatives and could create a somewhat greater incentive for development. This would result in greater bulk and scale of buildings, and decreases in the amount of open space, landscaped area, and area dedicated to surface parking. As redevelopment occurs over time, small buildings and parking areas would be replaced with larger buildings, which could affect the transition in scale from higher intensity zones to adjacent low intensity zones, such as between multifamily zones and single family zones. As a result of redevelopment, existing lawns and parking areas would be largely replaced by multistory structures, and streets would be fully developed with sidewalks, streetlights, and street trees. Overall, the study area would evolve from its existing largely suburban character to a more urban character.

Among the alternatives considered in the EIS, Alternative 3 could produce the tallest structures. However, it would not include upzoning of lower density land on the perimeter of the study area, so the immediate transitions to the single family zones would remain largely the same as under the No Action Alternative. The greatest difference under Alternative 3 would be seen along NE Northgate Way, where buildings could be up to 100 feet taller than currently allowed in the area closest to the east side of I-5. The transition in building heights from the single-family and Lowrise zones to the zones allowing the tallest buildings would still include incremental steps in allowable height. However, contrasts in height would be more pronounced under the Alternative 3 since the tallest height limit would be 160 feet, as shown in Figure 3-1.

Streetscape character

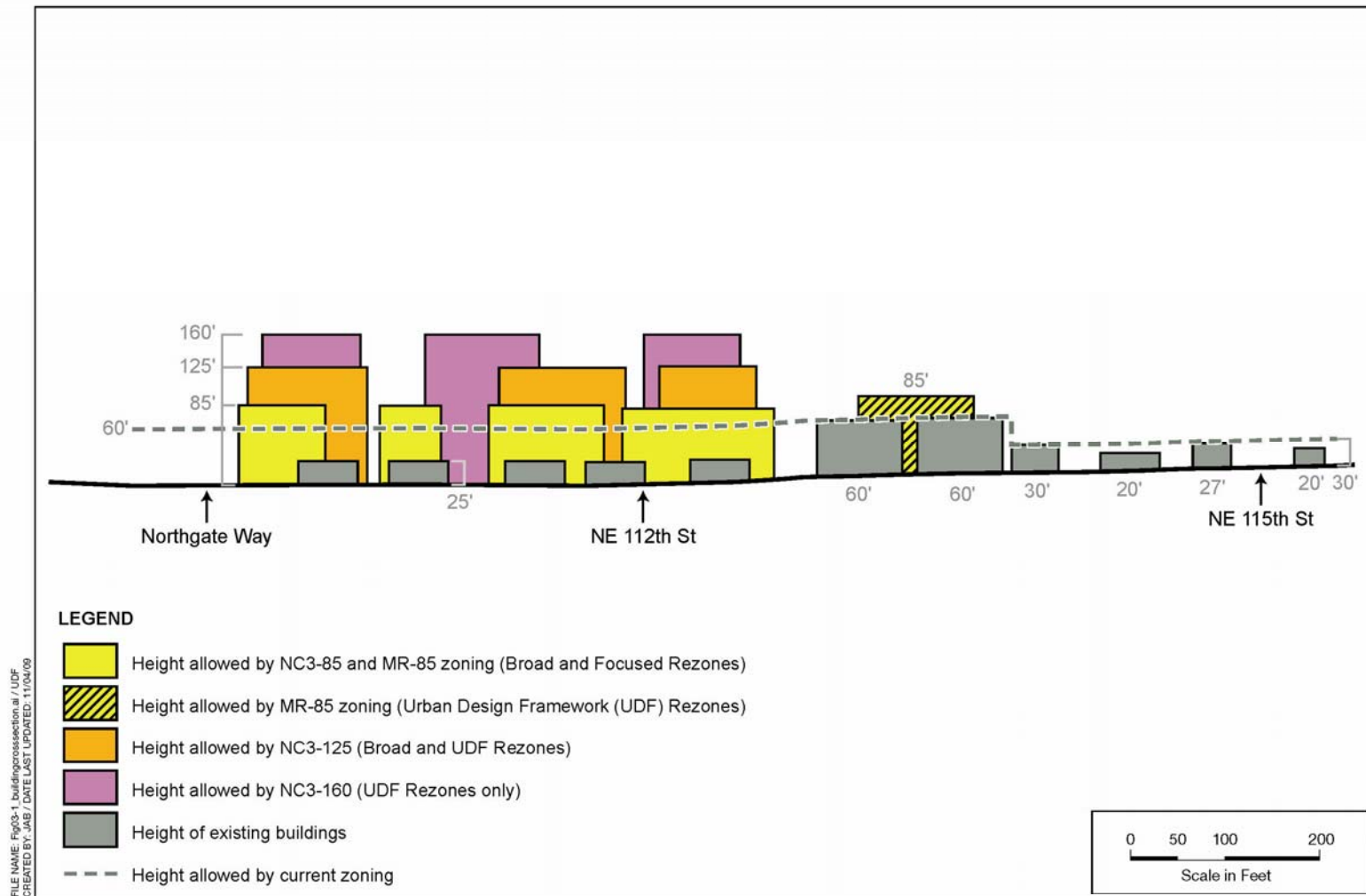
For all alternatives evaluated in the EIS, many new streetscapes would include storefront windows, lighted signage, street trees, limited landscaping along sidewalks and around buildings, and more pedestrian-oriented amenities along streets. Alternative 3 also encourages pedestrian pathways that would break up the large blocks of the area and would create additional storefront opportunities in some developments. The concentrated and more intensive development proposed under Alternative 3, along with implementation programs designed to provide streetscape improvements and amenities, could result in the highest level of street level pedestrian activity.

Protected Scenic Views

As described in Chapter 3 of the Draft EIS, there are no protected scenic views that would be adversely affected by Alternative 3 or any of the alternatives. The only protected view available from the study area is of Mount Rainier from the southbound lanes of I-5. Due to topography, that view would not be blocked by any structures within the study area.

Light and Glare

Under any of the alternatives in the EIS, including Alternative 3, development of new buildings could contribute new sources of light and glare. Light sources would include night lighting, storefront lighting, and interior building lights visible through windows at night, and vehicle headlights. Although these light sources would increase, none of these sources is expected to cause significant adverse impacts because the study area already has many of these types of lights and future project design review processes could set limits on light/glare in new development. In some cases, replacing a lighted parking lot with a building may decrease the level of glare from exterior lighting.



SOURCE: ESA Adolfsen, 2009.

Northgate Urban Center Rezone . 27112

Figure 3-1
 Cross Section through Subarea B
 Showing Allowable Building Height under Each Alternative

Reflected light can cause glare, and is especially a concern near highways and major thoroughfares where glare can impair drivers temporarily and create safety hazards. The primary potential source of glare is sunlight reflected off of building glass. With taller buildings being proposed near the freeway, this type of impact could increase under Alternative 3. Such potential impacts should be evaluated for any new buildings.

Bulk and Scale of Buildings and Transitions between Zones

The following analysis deals primarily with the scale of buildings, rather than the character of the facades, which is not known at this time. In general, Alternative 3 would allow more taller buildings than the other EIS alternatives, and therefore creates the potential for greater contrasts in bulk and scale with adjacent properties. Impacts within individual subareas would vary and are described in further detail below.

Subarea A. In Subarea A, existing zoning would be unchanged except for the NC3 zone immediately north and south of N Northgate Way, west of Corliss Ave N, where the allowable height would increase to 125 feet (NC3-125 zone). Current zoning has 65 feet to 85 feet height limits within the NC3-65 and NC3-85 zones respectively. The height allowed in the zone on the north side of N 107th St would be 40 feet higher than the height allowed on the south side. The property to the east of the new NC3-85 zone is part of the I-5 freeway, so no adverse bulk and scale impacts are anticipated to the south or east.

The adjacent NC3-40 zone to the northwest of Subarea A allows 40-foot tall buildings and the L-3 zone to the north of Subarea A allows 30-foot tall buildings. The most pronounced contrast would be between the L-3 zone immediately to the north of Subarea A, and the new NC3-125 zone which allows buildings up to 125 feet in height – a difference of 95 feet. North 112th Street provides some separation between the L-3 and NC3-125 zones, and the separation of buildings across the width of the street would help mitigate the impact of this contrast in height. Existing development standards in the Land Use Code would help address the issues of contrast and transition between these properties by limiting the scale of the upper stories of a building in the NC3-125 zone, requiring street trees, and requiring setbacks in the L-3 zone. Furthermore, any specific project would be subject to Design Review, which could address the transition by guiding the siting, massing and other features of any new buildings.

Subarea B. Subarea B abuts the freeway on the west, NE Northgate Way and Northgate Mall on the south, a succession of commercial and multifamily residential zones on the east, and single family (SF-7200) zoning to the north. Within the southern portion of this subarea, the maximum height allowed under Alternative 3 would increase to 160 feet (NC3-160 zone). This represents an increase from 60 feet allowed under the current MR zone, and an increase from 125 feet allowed under the NC3-125 zone under the Broad Rezone alternative. In the northern portion of Subarea B, MR zones up to 85 feet could occur, and existing Lowrise zones at the subareas north edge would be retained.

The most substantial change in allowable building heights would be along 1st Ave NE on the east side of the freeway where the western portion of the Northgate Apartments property would be rezoned to NC3-160. Buildings of this height would be substantially larger than any other buildings visible from the freeway, and thus would form a prominent new landmark. The scale

of the freeway and the separation provided by the on-ramp area would limit the bulk and scale impacts from 160-foot tall buildings. Development under the NC3-160 zone would not obscure any protected scenic views from the freeway.

The southern edge of Subarea B abuts NE Northgate Way, which is the focal center of the Northgate area. Like Alternative 1, Alternative 3 would allow commercial development up to the edge of the street right-of-way, and buildings could be 125 feet to 160 feet tall at this location. By comparison, the existing MR zone would allow development of 60-foot tall buildings in this area, with a 3 to 15 foot setback required from the street, and large setbacks on side lot lines. The proposed NC3-160 zoning would allow the tallest buildings nearest to the freeway, transitioning to NC3-125 going east. Building modulation is not required in NC3 zones, although some modulation is expected, especially for buildings with residential uses. Buildings would likely include retail uses at the street level and possibly one level above. Uses above the second floor would likely be offices, a hotel, or apartments. Additional setbacks are required above 40 feet, and limits on the floor area ratio (FAR) would likely result in tower structures that cover slightly less than one-half of a project site, typically built over a base that is built out to the property lines.

Across Northgate Way to the south of Subarea B, the zoning on the Northgate Mall site allows 85-foot tall structures, although most structures built to date have been far smaller and have been set back from the street. Over the next 20 years, however, it is possible that the Northgate Mall site could be developed with 85 foot-tall buildings.

The eastern edge of Subarea B would be zoned for 125-foot tall buildings (NC3-125) abutting Hubbard Homestead Park east of 3rd Ave NE in the center of the subarea. As described in the shadow analysis below, these structures would increase shadows on the park in late afternoon. The 160-foot tall buildings that may be built on the west side of Subarea B would be approximately 300 feet west of the park and thus would be visible behind the 125-foot tall structures only when viewed from the eastern side of the park.

To the northwest of the park along 3rd Ave NE, Alternative 3 would allow the same height limits in Subarea B as the properties in Subarea C to the east, each within a MR-85 zone. Potential bulk and scale impacts at the zone edge along 3rd Ave NE north of the park are described in Subarea C below.

Overall, the transition between single family zones to the north of Subarea B and the highest buildings along NE Northgate Way to the south would be gradual, characterized by a series of increasingly taller and larger-scaled buildings. The northern edge of Subarea B would remain zoned predominantly L-2, which currently allows 25-foot tall structures such as low-rise apartment buildings or townhomes. (Both L-2 and L-3 zones allow an additional 5 feet for a pitched roof.) A small area of the northern one-half of Subarea B adjacent to the freeway right-of-way could be upzoned to MR-85 from L-2. This would introduce the possibility of larger structures closer to the SF-7200 zone, where the height allowed is 30 feet. This MR-85 zone would also stand to the west and south of the L-2 zone described above, which could result in a 60-foot differential in the heights of buildings. Land Use Code requirements for building landscaping, setbacks, lot coverage, and façade modulation would provide a degree of mitigation for these impacts.

Subarea C. Subarea C is located to the north of NE Northgate Way between 3rd Avenue NE to the west and 5th Avenue NE to the east. The approximately 3-acre Hubbard Homestead Park is being developed on the north side of NE 112th Street within the central portion of the subarea. The zoning changes proposed under Alternative 3 would increase the allowable building heights and density only for the properties immediately to the north of the park. Under Alternative 3 zoning, the park would have neighboring structures with potential heights of up to 85 feet to the east and north. The 65-foot structure on the south side of the park is relatively new and is approximately the maximum height allowed by its NC3-65 zone. It is considered unlikely to redevelop in the 20- to 25-year time frame considered for this analysis. Under Alternative 3, new structures to the west of the park could rise as high as 125 feet, but these new buildings would only marginally increase the minor shading impacts on the proposed park compared to the Broad Rezone Alternative.

The site immediately north of the park is not separated from neighboring parcels by a road, as it is on all other sides. In this area, the zoning would change from L-4, which allows for building heights up to 37 feet, typically for townhouse and apartment building uses, to MR-85. The northernmost section of Subarea C would retain its current L-3 zoning designation and provide a scaled transition between the MR-85 zone to the south and the SF-7200 zone to the north of Subarea C.

Subarea D. The largest of the subareas, Subarea D is bisected by NE Northgate Way and extends from 5th Avenue NE to 12th Avenue NE. Most of the area is currently zoned for neighborhood commercial uses with allowable building heights ranging from 40 feet (NC3-40) to 85 feet (NC3-85). The area also includes some Lowrise zoned properties. Zoning changes allowed under Alternative 3 would permit increases in building heights (maximum of 125 feet) and density along the NE Northgate Way corridor and across the majority of the subarea.

The most substantial change in building height would occur in the central and southwestern portions of the subarea where the proposed zoning would be NC3-85 and NC3-125. These zoning changes would allow height limits in these areas to increase by 45 feet to 85 feet compared to existing zoning. This change would have the greatest impact along the north central, south central, and eastern sections of Subarea D, where significantly taller buildings would abut L-3 and NC3-40 zones. Where the NC3-125 zones abut L-3 zones, the difference in building height could be as great as 95 feet. South of NE Northgate Way, this pronounced change in scale would occur where 8th Avenue NE separates the two zones, but the width of the street would help ameliorate the contrast in heights. North of Northgate Way, the properties with this pronounced zone height difference abut one another and therefore the impacts would be potentially greater. The L-3 and NC-40 zones retained within the subarea would provide a transition in scale between the tallest buildings allowed under Alternative 3 and the nearby single family residential zones.

The north edge of Subarea D along NE 113th Street is currently zoned L-1, allowing 25-foot building heights typically as townhouse type development, could be rezoned to L-2, which also allows 25-foot building heights. It is not anticipated that this change would have any significant impacts on the single family zone (SF-7200) on the north side of NE 113th Street, but would allow for slightly denser townhouse development on these lots.

Subarea E. Alternative 3 would not revise zoning in Subarea E.

Shadows

Existing shadow conditions are created by the location and scale of structures relative to the seasonal pattern of the sun, time of day and weather. Topography and vegetation also influence shadow patterns. The Seattle Municipal Code (SMC 25.06.675) requires that shadow effects to all public parks and schools in Seattle be minimized. Within the vicinity of the Northgate Urban Center Rezone area, applicable public spaces would include Hubbard Homestead Park. In addition, an increase in shade and shadows may affect adjacent properties, sidewalks and streets.

Future development of taller structures would increase the potential for more shade and shadows in public spaces and on adjacent properties. This effect would be most pronounced on sidewalks and streets. However, impacts on streets are a typical and anticipated aspect of development in higher intensity zones and are not considered to be significant. In some cases, tall buildings can cast shade on adjacent properties, and the greatest potential for significant impacts would occur on properties north of new buildings.

Under Alternative 3, parcels in upzoned areas would have the potential for new buildings that are 20 to 100 feet taller than currently allowed under the No Action Alternative, and 20 to 60 feet taller than allowed under the Broad Rezone alternative. In general, any increase in height limits associated with rezoning would create taller and more lasting shadows. The following analyzes the potential for shadow impacts by subarea.

Subarea A. Under Alternative 3, the central portion of Subarea A would be rezoned to NC3-125, an increase in height of 40 to 60 feet from current zoning and an increase of 40 feet from Alternative 1. As I-5 lies to the east, shadow impacts are considered negligible for areas to the east. To the west, zoning heights would be largely unchanged and shadow impacts are anticipated to be minimal as the shadows from any new buildings will fall on adjacent buildings of heights ranging from 30 to 60 feet. The areas most impacted by increased shadows from the NC3-125 rezone will be those areas immediately across N 112th St to the north and northwest of Subarea A. During those times of year when the sun is low in the sky, generally later fall through early spring, those buildings closest to buildings in the NC3-125 zone could be shaded for longer portions of the day. As noted above, because the Land Use Code requires additional setbacks for portions of a building above 40 feet, and limits FAR so that towers up to 125 feet typically can occupy no more than half of the lot area, it would be possible to preserve some access to daylight for properties to the north. The City's Design Review process could be used to address this concern in building design where appropriate.

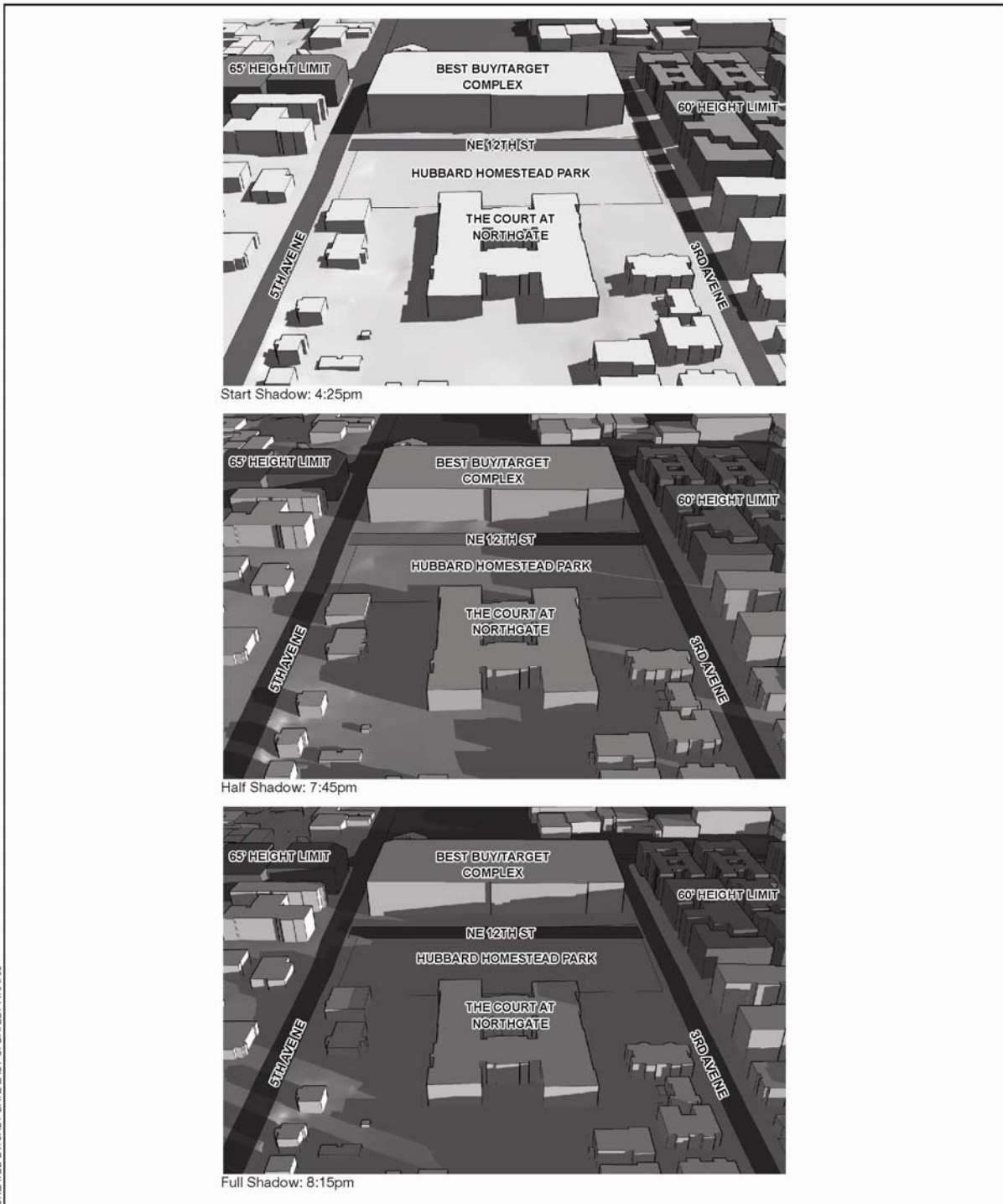
Subarea B. Under Alternative 3, Subarea B would experience the largest increase in height limits, up to a maximum of 160 feet under the NC3-160 designation – an increase of 100 feet from current zoning. However, given that the NC3-160 area of Subarea B is bordered by NE Northgate Way and I-5 on the south and west respectively, any increased shadows created by 160-foot tall buildings would have negligible impacts in these directions. The areas most impacted by the proposed NC3-160 zone would be buildings immediately to the east in the NC3-125 zone, and buildings immediately to the north in the proposed MR-85 zone. Structures in these areas would likely be substantially shaded by 160-foot tall buildings during the late fall

through early spring time period and would have reduced access to direct sunlight during the summer months. The NC3-125 and MR-85 designations in Subarea B, reflect a 25- to 60-foot increase in building heights from current zoning. As with the NC3-160 zone, these proposed zoning changes would result in increased shadows cast on buildings in the immediate northern vicinity of these zones during the shortest days of the year when the sun is low on the horizon. Setback and FAR limits in the Land Use Code would reduce the potential for these impacts to a degree and the City's Design Review process could be used to address solar access in building design where appropriate.

Under Alternative 3, zoning changes could lead to an increase in shadow impacts on the new park located immediately to the east of Subarea B and running along the north side of NE 112th St. Figure 3-1, above, illustrates the various height limits allowed under the alternative rezone plans along 3rd Ave NE, which borders the west side of the proposed park. As can be seen, Alternative 3 would allow for the tallest structures and represent the greatest increase in building heights. As a result, a shadow analysis using three-dimensional (3D) computer models was executed to examine shadow impacts to the park at different times of the year and at different times of the day.

As a baseline, a shadow analysis was performed using the current zoning designations (Figure 3-2). Simulated building visualizations were created up to the height limits of current zoning for those areas immediately to the west (60-foot tall) and to the southeast (65-foot tall) of the proposed park. For all other buildings, existing footprints and heights were used to create their respective 3D simulations. A date of June 1st was selected for the focus for the analysis as this represents a time of year and sun horizon pattern that would be typical for when the proposed park is most likely to be used in the late afternoon and evening. As shown in Figure 3-2, the 60-foot tall towers would begin to cast shadows on the park at 4:25 PM, cover half of the park's length (in the southwest quadrant) in shadows by 7:45 PM and fully cover the park in shadows by 8:15 PM. Note that because the sun sets so far to the north on June 1, the shadows that cover the park at 8:15 PM are largely cast by the existing building to the northwest of the park. Because this building is considered unlikely to be redeveloped in the next 20 to 25 years, the existing height was retained for this analysis.

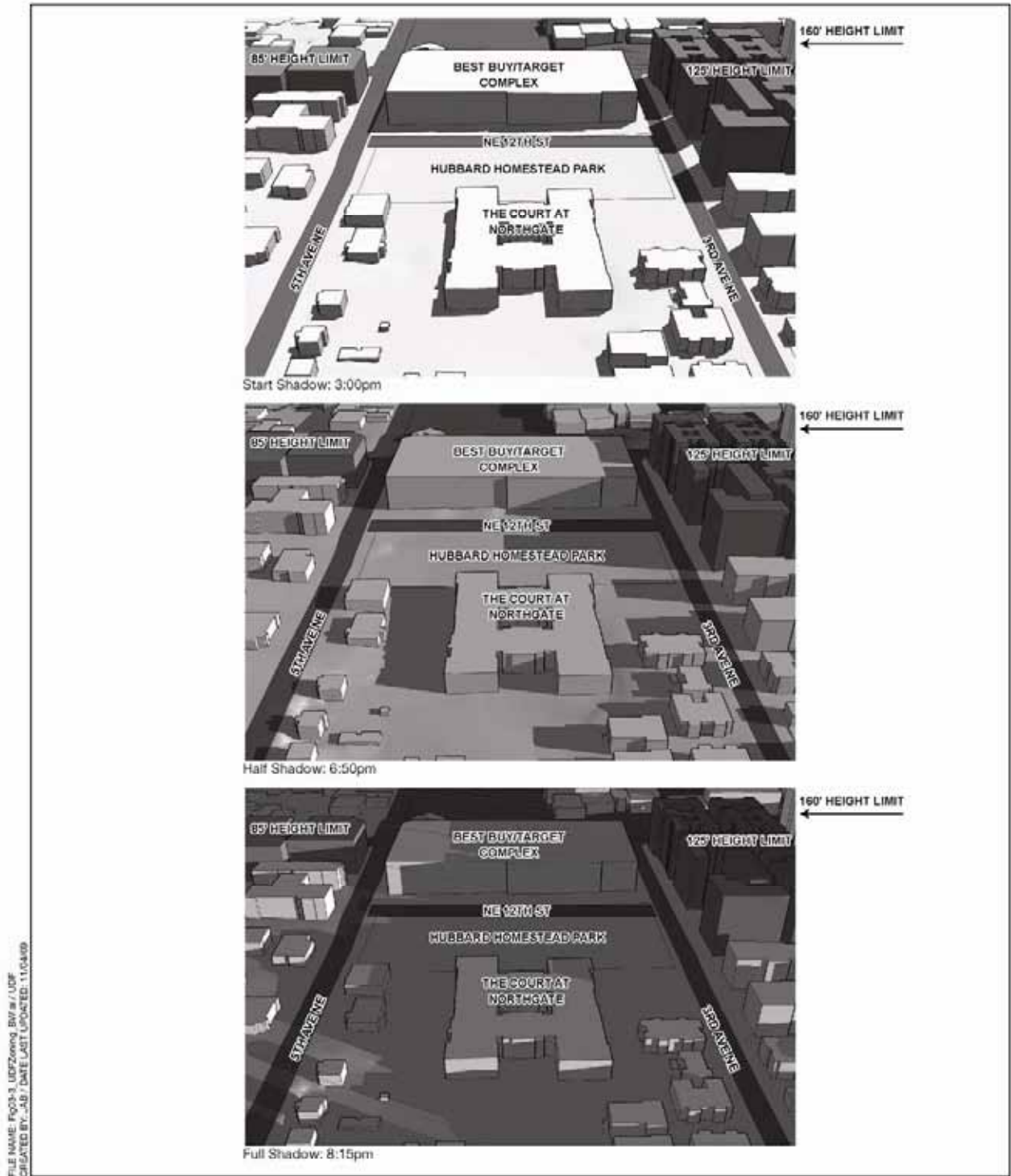
For comparison, a worst-case shadow analysis was also performed using Alternative 3 designations for the same areas to the west and southeast of the park (Figure 3-3). On June 1st, the shadow simulation shows that the 125-foot and 160-foot tall buildings in Subarea B would begin to cast shadows on the park at 3:00 PM, covering one-half of the park's length (in the southwest quadrant) in shadows by 6:50 PM. Shadows would fully cover the park by 8:15 PM, but these would be cast by existing buildings located to the northwest of the park. If the building to the northwest of the park were to be redeveloped to the proposed 85-foot height limit, the shadows from the new building might cover the park earlier, depending on how it was designed. However, it is considered unlikely to redevelop due to the size and condition of the existing building. Overall, shadow impacts would affect a small portion of the park for a portion of the day and are not considered to be significant.



SOURCE: ESA Adolfsen, 2009.

Northgate Urban Center Rezone . 27112

Figure 3-2
Shadow Analysis: Current Zoning (June 1st)
Seattle, WA



SOURCE: ESA Adolfsen, 2009.

Northgate Urban Center Rezone . 27112

Figure 3-3
Shadow Analysis: Alternative 3 Zoning (June 1st)
Seattle, WA

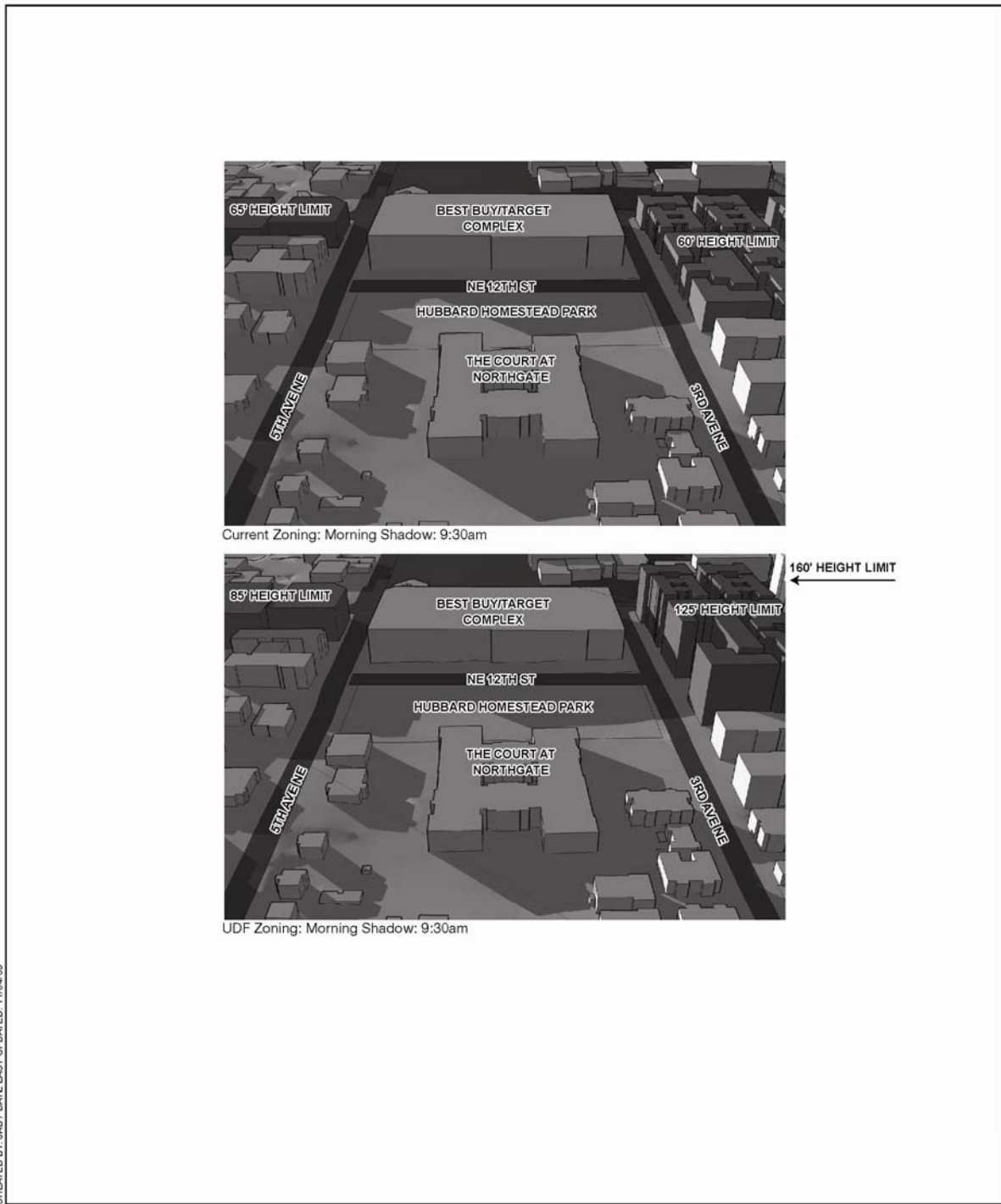
As can be seen in Table 3-1, shadow impacts on the park’s southwest quadrant would begin earlier in the day under Alternative 3 as compared to No Action, but differences in shadow would become less evident as evening approaches. Alternative 3 would have the greatest shadow impact on the park of all the alternatives. Images of the analysis for Alternative 1 are included in Final EIS Appendix B.

Table 3-1. Comparison of Afternoon Shadow Impacts on Hubbard Homestead Park

Shadow Extent on Park (June 1st)	Current Zoning (60’ heights)	Urban Design Framework (125’, 160, Heights)	Time Difference
Begin Shadow	4:25 PM	3:00 PM	85 minutes
Half Shadow	7:45 PM	6:50 PM	55 minutes
Full Shadow	8:15 PM	8:15 PM	0 minutes

In addition, a shadow analysis was conducted using a target date of November 1st at 9:30 AM to analyze the impacts of the properties southeast of the proposed park during the late fall through early spring time period (Figure 3-4). The analysis indicates that any additional shadows produced by either buildings reaching the current zoning height for this area (65-foot tall) or Alternative 3 (85-foot tall) would be negligible. The source of greatest shadow impact to the park during this time period would be from the existing Best Buy/Target complex and would not be caused by new buildings that may be built to the southeast either under the No Action or Alternative 3.

Figure 3-4. Morning Shadow Analysis: Current and Alternative 3 Zoning



FILE NAME: Fig03-4_Zoning_Morning_Shadow_BV.dwg / UDF
CREATED BY: JAB / DATE LAST UPDATED: 11/04/09

SOURCE: ESA Adolfson, 2009. Northgate Urban Center Rezone . 27112

Figure 3-4
Morning Shadow Analysis: Current and Alternative 3 Zoning (November 15th)
Seattle, WA

Subarea C. Under Alternative 3, the only change proposed in Subarea C is for the area immediately north of the proposed park which could be rezoned from L4 to MR-85. This represents an increase in allowable height from 37 feet to 85 feet, an increase of 48 feet. In terms of shadows, this would create the greatest impact during the shorter winter days on properties immediately neighboring any buildings built to the 85-foot maximum.

Although the parcels zoned single-family (SF-7200) to the north and northeast of the proposed MR-85 zone could be impacted by shadows, they are adjacent to the site driveway for The Court at Northgate condominium complex, which is not considered likely to be redeveloped due to the size and condition of the building. It is more likely that the rezone would result in a new building and/or an addition to the existing Court at Northgate building on its south or southwest side, nearest the park, which potentially could cast shadows on the L-3 zoned properties to the north.

Subarea D. Subarea D would see height limit increases ranging from 25 to 85 feet with the heights of the tallest buildings reaching 125 feet. The proposed NC3-125 zones within Subarea D area that are located south of NE Northgate Way would cast shadows on the street and on other similar scale buildings to the north and would not cause significant impacts. The NC3-125 zone north of NE Northgate Way would abut an L-3 zone and an NC3-65 zone on the north, and the MR-85 zone would also abut an L-3 zone. Shadow impacts on the L-3 zone could be significant if the massing of a 85-foot or 125-foot tall structure were located immediately to the south. This impact could be minimized through the Design Review process by prioritizing preservation of solar access for adjacent properties. In Subarea D, no shadow impacts to single family zones are anticipated.

Subarea E. Alternative 3 does not include changes in zoning to Subarea E, and therefore no changes in shadow impacts would result.

3.3.2 Mitigation Measures

The following mitigation measures were described in the Draft EIS, and would be applicable to impacts generated under any alternative, including Alternative 3 impacts as discussed above. Potential mitigation for long term aesthetic impacts would be addressed through the SEPA and Design Review processes for individual projects. Measures to address site-specific impacts could include:

- provision of additional setbacks;
- limiting the height of a portion of a building to improve the transition between zones;
- using materials and landscaping to soften abrupt transitions in the character of development, such as when a commercial building abuts a lower density residential zone; and
- providing urban streetscape amenities to create a unified character of development among varied uses.

The Draft Northgate Open Space and Pedestrian Connections Plan suggests a number of streetscape improvements that would help to ensure a pleasant walking environment and balance safety and aesthetic considerations. Encouraging mid-block open space and circulation routes to

break up the superblocks would help to reduce the impacts of increased bulk and scale, especially on larger properties. Regulatory actions being considered also anticipate such measures. Streetscape improvements could be considered to mitigate the impacts of more intensive development that abuts the street right-of-way, as could be expected under any of the alternatives. Shade and shadow impacts on adjacent properties also could be minimized by requiring additional setbacks for taller structures or portions of structures above a specified height.

3.3.3 Significant Unavoidable Adverse Impacts

The scale and transitions between buildings of different height and intensity in differing zones presents the greatest potential for impacts, but transitions in scale have been incorporated in each alternative. Alternative 3 would provide the most gradual transition between high intensity uses in the Urban Center and adjacent lower density residential uses. In addition, design review would be required for any major development project, which would provide an opportunity to further study transitions on individual sites and for individual projects. Therefore, there are no significant unavoidable impacts anticipated on scenic resources or aesthetics.

3.4 Recreation

One notable change in existing conditions described in the Draft EIS is the planning, design and commencement of construction of Hubbard Homestead Park. Figure 3-5 below depicts a rendering of the basic site plan. This section discusses impacts of Alternative 3 on recreation facilities, such as increased demand for facilities, accessibility of parks to park users, and impacts on safety, security and enjoyment of parks and recreation facilities.

Figure 3-5. Hubbard Homestead Park Concept Plan

Source: Seattle Parks and Recreation 2009

3.4.1 Impacts

Impacts to recreation under Alternative 3 would be similar to Alternative 1. The number of park users living in close proximity would likely be slightly greater for Alternative 3, because this alternative would encourage more housing and a greater residential population in the study area. Like Alternative 1, Alternative 3 is not expected to significantly increase the number of residents in the broader Northgate Planning Area over the long run, but rather to concentrate expected residential growth close to Northgate Way and therefore closer to Hubbard Homestead Park. The new park would be more accessible by foot or bicycle to new residents, which could result in the park being more heavily used. At the same time, improved pedestrian access should also reduce traffic and parking issues around the park compared to the No Action Alternative. These impacts are not expected to be significant.

As described above in Section 3.3 Aesthetics, Alternative 3 and related future development could increase afternoon shadows in the southwest quadrant of Hubbard Homestead Park, due to taller buildings across the street to the west. On cooler afternoons and evenings, passive activities such as picnicking, reading, or people watching, might be less enjoyable for some individuals in areas that are in shade. Because the taller buildings could cause shade in that southwestern

portion of the park an hour earlier, this may affect use patterns in the park. However, these impacts are not expected to be significant.

3.4.2 Mitigation Measures

The following mitigation measures could be employed to minimize impacts on recreation during potential future construction:

- Coordinate with the Seattle Department of Parks and Recreation to ensure that access is maintained during construction;
- Provide adequate notification prior to park closures or access restrictions; and
- Place adequate signage at and near the site to alert park users of upcoming use restrictions.
- Design individual projects to minimize shading by placing taller buildings as far from the park as possible and providing spacing between towers.

3.4.3 Significant Unavoidable Adverse Impacts

While the rezone alternatives would increase density and thus utilization of recreation resources, no significant unavoidable impacts are anticipated.

3.5 Transportation

3.5.1 Evaluation Methodology

Alternative 3 is similar in the number of residential units and total amount of commercial space to Alternative 1A and has the more concentrated development characteristics of Alternative 2. However, Alternative 3 places greater emphasis on the creation of a high-quality environment for non-motorized travel. It contemplates additional physical improvements that would create and support a more pedestrian-oriented and transit-oriented environment for living, working, and shopping.

The methodology used to estimate traffic impacts is described in greater detail in Section 4.5.1 of the Draft EIS. Traffic generation, trip distribution and level of service impacts of Alternative 3 were estimated using SDOT's Seattle Transportation Model, along with adjustments described in the subsection on *Level of Service* below.

3.5.2 Planned Transportation Improvements

As with the Draft EIS alternatives, Alternative 3 assumes implementation of the sixty-three transportation improvements recommended in the CTIP to address the spectrum of transportation system needs to accommodate future growth by 2030. Transportation improvements

recommended along or near Northgate Way are identified in Table 4-5 and Figure 4-8 of the Draft EIS. It is also assumed that implementation of improvements will keep pace with redevelopment. This will occur through monitoring of development and on-going funding of projects through the City's Capital Improvements Plan (CIP).

3.5.3 Transportation Characteristics of Alternative 3 - Urban Design Framework

All EIS Alternatives embody many characteristics of "smart growth" or "compact development" that are identified in current planning literature: increased densities, quality urban design, mixed land uses, stronger centers, and improved pedestrian infrastructure. A synthesis of planning research, identified in the reference section of the Final EIS, identifies five elements (referred to as "the five D's") of land use and transportation interaction that affect how we travel. These five elements describe land use characteristics that affect transportation and indicate potential vehicle trip reductions as compared to typical trip generation rates in the Institute of Transportation Engineers *Trip Generation Manual*, that can be associated with land use patterns. The potential vehicle trip reductions noted are cumulative.

Density: How dense the development is. Higher densities result in shorter trip lengths, more walking and biking, and support higher-quality transit service. Research finds that doubling density can result in a reduction in daily vehicle trips by 4 to 12 percent and the total vehicle miles traveled (VMT) by 1 to 17 percent as compared to typical trip generation estimates.

Diversity: The degree to which the site contains a balanced mixture of land uses. Higher diversity enables trips to be linked, for example when the dry cleaner is located next to the Post Office, which in turn is next to the coffee shop. It results in more walk and bike trips, and allows for more shared parking. Research finds that a 100 percent improvement in diversity can result in a reduction in daily vehicle trips by 1 to 11 percent and VMT by 1 to 13 percent.

Design: Site connectivity and walkability, measured in terms of the percentage of street miles with sidewalks, network density, and route directness (the distance between two points via the roadway network versus the "as the crow flies" distance). Neighborhood design may also include such factors as the presence or absence of street trees for shade, and street lighting. Pedestrian and bike-friendly design can affect whether people feel comfortable getting out of their cars. Research finds that improvements in design related to connectivity and walkability can result in a reduction in daily vehicle trips by 2 to 5 percent and VMT by 2 to 13 percent.

Destinations: Site locations and their accessibility relative to the major attractions in the region. An urban infill/redevelopment site will usually provide greater opportunities to walk, bike and use transit than a comparable site located in a suburban location. The accessibility to destination can result in a reduction in daily vehicle trips by 5 to 29 percent and VMT by 20 to 51 percent.

Distance to Transit: How far the site is to the nearest rail station. Recent research has established a strong relationship between proximity to transit and transit mode choice;

Transit oriented development sites have a 30 to 60 percent lower use of automobile travel modes than sites located more distant from transit.

While all EIS alternatives share most of these characteristics, Alternative 3 is evaluated in the Final EIS so as to place a greater emphasis on the creation of a walkable environment, and to illustrate, for SEPA analysis purposes, the potential effects of a more walkable environment on circulation and congestion. It is acknowledged that this same emphasis also could be achieved with the other alternatives if they emphasized implementation programs that achieved on-site and off-site improvements supporting a pedestrian orientation in the Northgate Urban Center. For example, breaking up large blocks, creating more links to destinations, and creating a pedestrian environment that provides street/sidewalk facilities, crossing treatments, reduced travel distances, and pedestrian-scale amenities, would all increase walking potential. The analysis of Alternative 3 illustrates the potential effects of this greater pedestrian orientation.

3.5.3.1 Traffic Volumes

Figure 3-6 shows 2030 PM peak hour volumes for Alternative 3 and the change from No Action. Because the analysis assumes that the overall numbers of residents, students, and employees within the CTIP study area would be unchanged, the increase in assumed development along Northgate Way for Alternative 3 would correspond to an assumed lesser amount of development in other areas of the Northgate CTIP study area. In addition, the traffic model redistributes traffic to roadways that provide a faster travel path between a trip's origin and destination. The combination of these factors leads to results that have only relatively small differences in traffic volumes compared to the No Action Alternative.

3.5.3.2 Levels of Service Analysis

To provide a comparable evaluation with the other EIS alternatives, the analysis of Alternative 3 estimates trip generation, and then applies the volume difference at the intersections to the results from DEIS Alternative 2. Alternative 2 is used for the comparison because it has levels of concentrated development along NE Northgate Way that are roughly similar to Alternative 3..

Based on the potential reductions identified for the “five D’s” above, the trip generation for Alternative 3 conservatively assumes an additional 5 percent reduction in PM peak hour trip generation compared to the other EIS alternatives. This reflects the somewhat greater intensity of uses and probable improvements in pedestrian circulation. The analysis then applies the net change in trips to the intersection turning volumes from Alternative 2 to estimate the level of service at each study intersection.

The intersection analysis assumes that the signal timing of the intersections along Northgate Way would be coordinated and optimized. The CTIP EIS and the Northgate Urban Center Rezone DEIS use LOS E as the standard to measure performance and evaluate the need for system improvements.

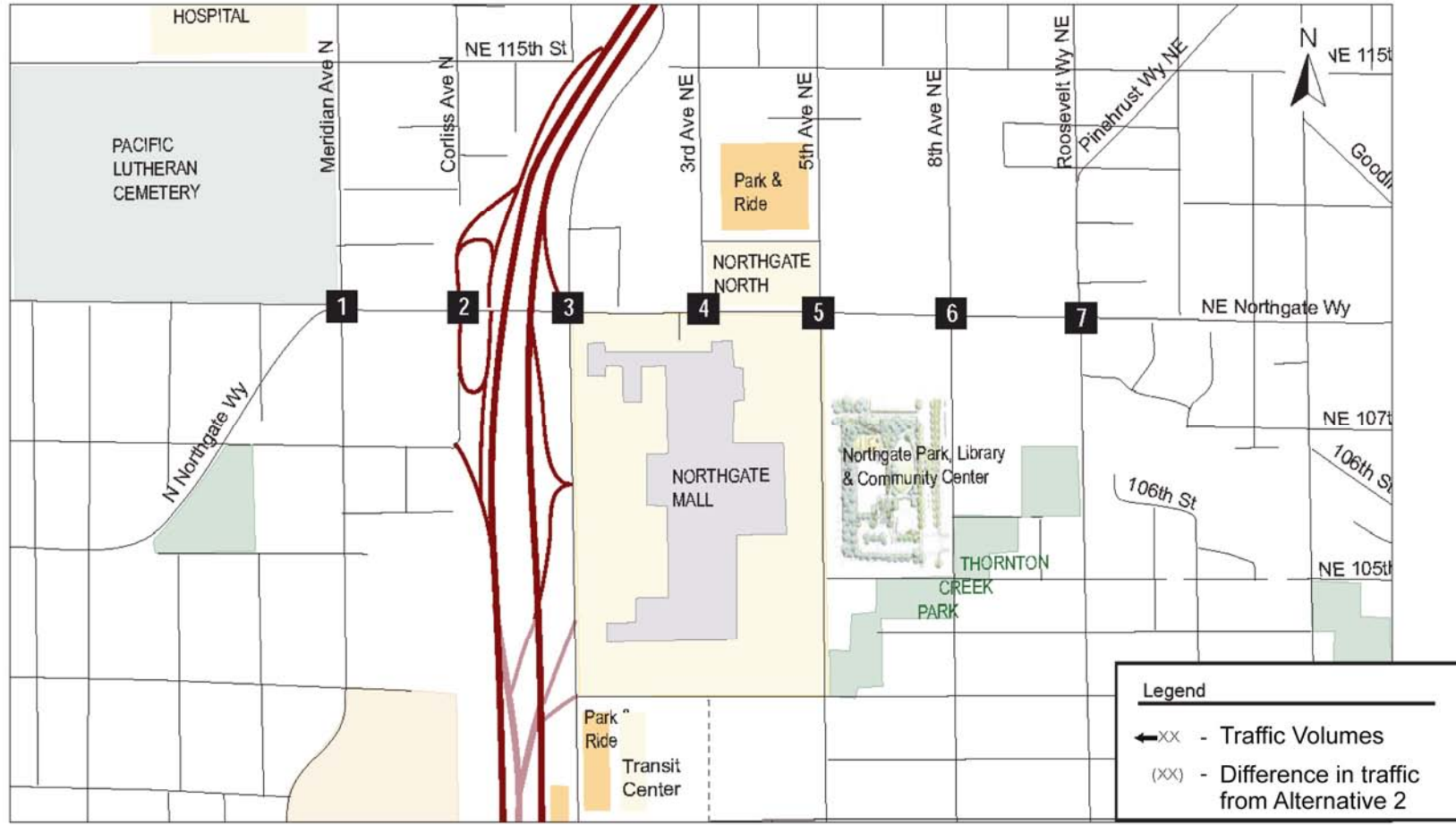
Table 3-2 shows the level of service and average delay for each intersection under the No Action Alternative and Alternative 3. For comparison, Table 3-3 shows the level of service and average

delay for each intersection for all EIS alternatives. Notable results of analysis include that the intersections at Meridian Avenue N/N Northgate Way would operate at LOS F in 2030 under Alternative 3 and all other EIS alternatives. This intersection lacks the additional right-of-way for improvements and is assumed to be built out to its final form.

Table 3-2. 2030 PM Peak Hour Level of Service Operation –No Action Alternative and Urban Design Framework (Alternative 3)

Intersection	2030 No Action		Alternative 3 Urban Design Framework	
	LOS	Average Delay	LOS	Average Delay
Meridian Ave N / Northgate Way	F	104	F	99
Corliss Ave N / Northgate Way	D	44	D	38
1st Ave NE / Northgate Way	D	47	E	72
3rd Ave NE / Northgate Way	E	61	E	64
5th Ave NE / Northgate Way	E	68	E	73
8th Ave NE / Northgate Way	C	24	C	27
Roosevelt Way NE / Northgate Way	E	66	D	50

Figure 3-6. Alternative 3 - Urban Design Framework 2030 PM Peak Hour Turning Volumes



	1 NE Northgate Wy	2 NE Northgate Wy	3 NE Northgate Wy	4 NE Northgate Wy	5 NE Northgate Wy	6 NE Northgate Wy	7 NE Northgate Wy
Meridian Ave N	123 (4) 375 (-14) 300 (7) 217 (-12) 1,541 (29) 152 (-5)	552 (26) 53 (4) 1,539 (84) 126 (9)	134 (-3) 116 (-27) 94 (10) 111 (0) 626 (-8) 1,149 (-7)	210 (5) 15 (5) 15 (-1) 98 (30) 1,277 (79) 127 (-15)	103 (-2) 278 (-40) 232 (17) 198 (1) 979 (47) 350 (-60)	516 (27) 56 (4) 63 (-1) 102 (6) 1,168 (-7) 86 (7)	361 (-42) 512 (-8) 127 (0) 50 (-6) 709 (-66) 91 (6)
Corliss Ave N	98 (-8) 1,025 (17) 30 (-1)	1,461 (-171) 154 (11)	1,497 (175) 845 (-193)	545 (179) 1,893 (-30) 119 (0)	211 (-8) 1,504 (75) 102 (-13)	479 (52) 1,552 (-56) 184 (14)	69 (1) 52 (3) 277 (-6)
1st Ave NE	150 (3) 437 (-44) 537 (7)	17 (1) 712 (0)	853 (-4) 222 (-17) 367 (22) 437 (56)	609 (32) 18 (8) 42 (-4)	263 (12) 617 (-21) 583 (6)	69 (1) 52 (3) 277 (-6)	464 (-66) 924 (-10) 130 (-1)
3rd Ave NE							
5th Ave NE							
8th Ave NE							
Roosevelt Wy NE							

Table 3-3. 2030 PM Peak Hour Level of Service Operation –Comparison of All Alternatives

Intersection	CTIP 2030 Baseline		Rezone EIS 2030 No Action		Alt 1A Broad Rezone Residential Focus 2030		Alt 1B Broad Rezone Commercial Focus 2030		Alt 2 Focused Rezone 2030		Alt 3 Urban Design Framework	
	LOS	Average Delay	LOS	Average Delay	LOS	Average Delay	LOS	Average Delay	LOS	Average Delay	LOS	Average Delay
Meridian Ave N / Northgate Way	F	103	F	104	F	97	F	97	F	98	F	99
Corliss Ave N / Northgate Way	D	43	D	44	D	42	D	39	D	38	D	38
1st Ave NE / Northgate Way	D	53	D	47	E	79	F	82	E	71	E	72
3rd Ave NE / Northgate Way	E	69	E	61	F	89	E	74	E	75	E	64
5th Ave NE / Northgate Way	E	68	E	68	F	81	F	87	E	79	E	73
8th Ave NE / Northgate Way	C	12	C	24	C	29	C	28	C	31	C	27
Roosevelt Way NE / Northgate Way	E	76	E	66	D	47	D	49	D	51	D	50

3.5.3.3 Pedestrian Impacts

Recent research has identified some of the relationships between the built environment and pedestrian walking activity, generally when walking is a mode of transportation rather than a recreational activity. Factors that are most influential to walking for transportation can be correlated to residential and commercial development density, distance to nonresidential destinations, and the mix of land uses and commercial activities. Network connectivity, presence of parks and open space, and personal safety concerns are also related factors. Residential choice -- choosing to live in a pedestrian-friendly environment – is also identified in the research as an important determinant in predicting pedestrian travel behavior.

A recent study (Wolfe, 2009) prepared for the Runstad Center for Real Estate Studies at the University of Washington, identified ten barriers, challenges, solutions, and best practices to implementing urban centers and transit oriented development in Washington. The top three issues identified are:

- accommodating pedestrians (reflecting a pedestrian orientation in the built environment);
- improving access from transit to jobs and residences (locating new development in proximity to transit opportunities); and
- moving from “node” to “place” (creating places oriented to people rather than cars).

Another study (Leslie, 2007) identified four relevant and measurable attributes of walkability: dwelling density, connectivity, land use mix and new retail areas. Regarding connectivity, it was observed that higher intersection densities (that is, a greater number of intersections in a given area that have sidewalks) provide people with a greater variety of potential routes, easier access

to major roads where public transportation is available, and shorter times to get to destinations. A number of GIS-based models and other evaluation tools have also been developed to measure walkability, including the “walkscore” website (www.walkscore.com); the Active Neighborhood Checklist and protocols, developed by the St. Louis University School of Public Health; and the INDEX computer model, developed by Clarion Planners and Fehr & Peers. Some physical and environmental factors considered in the Active Neighborhood Checklist that influence walkability include sidewalk location, continuity, width and condition; aesthetic and comfort factors, such as shade trees, benches and amenities; and the presence of litter, trash and graffiti.

It can be observed, therefore, that the “five D’s” – density, diversity, design, destinations and distances – identify factors that are conducive to pedestrian travel and can also reduce the number of vehicle trips. The cited research identifies other factors, including connectivity, that can also promote increased walking and reduced driving. In general, assuming that these principles are integrated in land use planning, the amount of pedestrian activity in an area will increase as a corollary of decreased vehicle trips. This causal relationship is implicit in the trip reduction factors that are incorporated into transportation models. Development will generate pedestrian traffic as well as vehicle traffic, and increased pedestrian traffic will result in impacts to the pedestrian environment: additional or enhanced physical improvements would be needed to support and encourage increased pedestrian activity. In addition, improvements to the pedestrian environment would further serve to support the shift in transportation mode choice away from vehicle trips and toward pedestrian trips. In these ways, pedestrian connectivity enhancements can be utilized to help mitigate the traffic impacts of increasing and concentrating development capacity within the study area.

While a nexus between development and walking activity can be identified, measuring the impact of a specific land use action on pedestrian activity and associated facilities is not well documented. Nationwide standards to evaluate impacts or assess mitigation have not been developed at this time.

3.5.4 Mitigation Measures

The traffic analysis of the alternatives generally references the CTIP benchmark of LOS E when discussing intersection impacts. This is a guide only and is not an adopted level of service standard. Although the City has not formally adopted a level of service standard for intersection operations city-wide, SDOT and DPD seek to maintain LOS D and use this as a measure of impacts when reviewing proposed projects and requiring mitigation. In some cases, however, operations have already degraded beyond LOS D and improvement to that level is not practical or reasonable. Those determinations may be made on a case-by-case or area-wide basis. The CTIP applied the LOS E benchmark as a way to balance the needs of different transportation modes with levels of funding that were considered achievable.

As noted in the Draft EIS, any of the Northgate Urban Center Rezone alternatives would change the distribution of development within the Northgate area. Concentrating development along the Northgate Way corridor and maintaining LOS benchmarks would require implementation of CTIP improvements within the Northgate Way corridor. The majority of improvements needed to mitigate level of service impacts for all of the alternatives are already included in the CTIP

and are identified as “near-term” improvements. The mitigation analysis in this EIS assumes that these projects will be funded and constructed within the timeline identified in the CTIP, regardless of whether rezones occur through legislative area-wide rezoning or through individual contract rezones. This EIS also identifies two additional targeted improvements not contemplated by the CTIP at intersections where impacts would occur as a result of Alternatives 1A and 1B. With the mitigation measures identified in Table 4-5 of the Draft EIS, all of the action alternatives would meet the CTIP LOS E intersection benchmark, although delays at key intersections would increase. As described previously, the analysis assumes that the overall numbers of residents, students and employees would be the same as assumed for the CTIP, and that the increase in development along Northgate Way would be offset by corresponding lesser levels of development at other locations within the Northgate CTIP study area. All alternatives also assume the completion of CTIP roadway improvement projects along the Northgate Way corridor. Additional improvements are recommended for Alternatives 1A and 1B. Table 3-4 summarizes the mitigation for each alternative, including Alternative 3:

Table 3-4. Recommended Mitigation for each Alternative

<i>Alternative</i>	<i>Recommended Mitigation</i>
No Action	<ul style="list-style-type: none"> • Completion of Northgate Way CTIP projects listed in Table 4-5 in the DEIS
Alternative 1A	<ul style="list-style-type: none"> • Completion of Northgate Way CTIP projects listed in Table 4-5 in the DEIS • Improve intersections of NE Northgate Way at 3rd Ave NE and 5th Ave NE
Alternative 1B	<ul style="list-style-type: none"> • Completion of Northgate Way CTIP projects listed in Table 4-5 in the DEIS • Improve intersections of NE Northgate Way at 1st Ave NE and 5th Ave NE
Alternative 2	<ul style="list-style-type: none"> • Completion of Northgate Way CTIP projects listed in Table 4-5 in the DEIS
Alternative 3	<ul style="list-style-type: none"> • Completion of Northgate Way CTIP projects listed in Table 4-5 in the DEIS

Many of the actions that will mitigate the increase in population and employment and achieve a more pedestrian-oriented environment are encompassed in the implementation programs that could be applied to any of the rezone alternatives, including the following:

- New and amended guidelines to address pedestrian connections across private property, transit-friendly improvements, bicycle infrastructure, and environmental sustainability.
- Amendments to SDOT’s right-of-way improvements manual to provide guidance for streetscape improvements, including the 3rd Avenue NE Green Street and potential 8th Avenue NE Green Street.
- Incentive zoning that would provide a density bonus program for mid-block pedestrian promenades, green street setbacks and other open space in addition to affordable housing.

The intended effect of these mitigation actions would be to change travel behavior within the Northgate area. By creating a pedestrian-oriented environment, Alternative 3 or any of the rezone alternatives could reduce the area’s reliance on private automobiles by encouraging

accessibility and ease of non-motorized and transit trips for greater numbers of residents, employees and business patrons.

Significant Unavoidable Adverse Impacts

The only unavoidable significant impact on transportation is the contribution of additional traffic to the N Northgate Way/Meridian Avenue N intersection, which is expected to degrade to LOS F under any alternative (including the No Action Alternative), even with implementation of the improvements planned under the CTIP. As with the Alternative 1A Broad Rezone-Residential Focus scenario described in the Draft EIS, degradation of the level of service at the intersection of 3rd Avenue NE/Northgate Way could be mitigated, but the mitigation itself could have impacts that may be considered significant.

3.6 Air Quality

3.6.1 Construction Impacts Common to All Alternatives

The construction impacts common to all alternatives discussed in the Draft EIS are also applicable to Alternative 3. Refer to the Draft EIS for the complete discussion.

3.6.2 Operation Impacts

The discussion of potential impacts on carbon monoxide generation for Alternative 3 is based on the methods and results of the analysis completed for the Draft EIS. Refer to that document for details of methodology and results of the analysis.

In general Carbon Monoxide (CO) modeling is based on the functioning of key intersections in the study area. Poor performing intersections result in idling cars which is a source of CO. Intersection functions are estimated using traffic models based on land use and development densities. Traffic and intersection functioning under Alternative 3 are expected to be similar to those identified for the Broad Rezone Alternative 1A. In general, there would be an increase in traffic and peak-period traffic delay. Model-calculated 1-hour CO concentrations with this alternative are 0.1 to 0.5 ppm greater than with the No Action Alternative, but nonetheless would remain sufficiently low so as not to approach or exceed the ambient air quality standards for CO. It is assumed that model-calculated 1-hour CO concentrations would be similar under Alternative 3 and that they would also remain sufficiently low so as not to approach or exceed the ambient air quality standards.

Greenhouse Gas Impacts

Mitigating climate change by reducing greenhouse gas (GHG) emissions has become a priority in Washington State. The Governor's Executive Order (EO 09-05) established the reduction of automobile use and increasing transit options as key components to Washington State's approach to mitigating climate change.

One of the underlying principles of the Vision 2040 growth management plan (PSRC, 2009) for the Puget Sound region is that concentrating growth in Urban Centers at higher densities will reduce automobile trips and encourage transit use and walking, compared to dispersing growth to areas that are more automobile dependant (less accessible to transit and less walkable).

The issue paper on Health: *What's Health Got to Do with Growth Management, Economic Development and Transportation*, prepared in support of the PSRC's Vision 2040 Final EIS, noted research findings showing that higher residential densities and mixed use development reduced CO2 production and decreased automobile use, a major contributor of GHG (PSRC, 2004). The Puget Sound Clean Air Agency's *Roadmap for Climate Protection: Reducing Greenhouse Gas Emissions in Puget Sound* (2004), includes "reducing vehicle miles traveled" as one of its priority recommendations. The report notes that "land use development patterns that decrease citizens' dependence on vehicles (especially single passenger trips) and that support the development of transit options are needed to reduce fossil fuel combustion emissions from cars."

Any of the proposed rezone alternatives analyzed in the Draft and Final EIS would support more efficient growth patterns, consistent with regional planning as well as the City of Seattle and King County Comprehensive Plans, which are expected to assist in controlling GHG emissions. The alternatives evaluated in the Draft and Final EIS would help Seattle achieve its goals for accommodating residential growth in areas that are well served by transit and within walking distance to a broad range of services and employment opportunities.

The alternatives provide different types of redevelopment incentives that would encourage the concentration of growth from the larger Northgate planning area into a more compact form of development focused along the Northgate Way corridor. This concentration could result in a modest reduction of vehicle miles traveled by future residents of the planning area, depending primarily on how many use public transit or non-motorized forms of travel. Alternative 3 would be the most intensive and would create the greatest potential reduction in auto travel, and the greatest potential use of public transit and non-motorized forms of transportation. As identified in the Transportation section of the FEIS, Alternative 3 is expected to result in the greatest reduction in auto travel and the greatest increase in non-motorized travel.

Under the No Action Alternative, there is a potential risk that the area would not achieve its growth targets because the incentive to redevelop is not great enough under existing zoning. If the Northgate area failed to meet its growth targets, growth would be likely to increase in outlying areas where land is less expensive and potential profits from development are greater. This and other offsetting factors cannot be reliably quantified for this proposal, but should be acknowledged.

King County and the City of Seattle have developed a GHG worksheet as a means of quantifying GHG emissions associated with development proposals. The worksheet, intended to accompany SEPA analyses for development proposals, estimates GHG emitted by the manufacturing of construction materials; energy demands created by the use of a development after it is completed; and transportation demands created by a development. The worksheet was not completed for this analysis because, as a programmatic review, there is insufficient project-level information to establish reasonable assumptions. Specific GHG assessments will be prepared for project-level proposals within the study area.

3.6.3 Mitigation Measures

The mitigation proposed in the Draft EIS for construction and operation impacts applies to all alternatives and would apply to Alternative 3 as well. Refer to the Draft EIS for the discussion of mitigation.

3.6.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse air quality impacts have been identified with any of the alternatives examined, including Final EIS Alternative 3, and none are anticipated.

3.7 Water Resources

Impacts on water resources would be the same as those described in the Draft EIS for Alternative 2, and are not considered to be significant. Please see the Draft EIS for discussion of those impacts and mitigation measures.

3.8 Plants and Animals

Impacts on plants and animals would be the same as those described in the Draft EIS for Alternative 2, and are not considered to be significant. Please see the Draft EIS for discussion of those impacts and mitigation measures.

CHAPTER 4 COMMENTS & RESPONSE TO COMMENTS ON THE DRAFT EIS

Introduction

This chapter of the Final EIS provides comments on the Draft EIS that were submitted by agencies, associations and individuals, and responses to those comments. Comments were submitted by letter, email and via oral testimony at a public meeting. Comment letters were received from 4 agencies, 5 groups or associations, and 23 individuals. Seventeen people also provided testimony at the public meeting. There was some overlap between those submitting written comments and oral testimony. In total, comments were received from 43 separate individuals/organizations.

Each comment letter received by DPD during the public comment period, and each set of oral testimony at the public meeting, was given a number. Each substantive comment within each letter or testimony was also given a number. Responses are provided following each letter; each response is numbered to correspond to the applicable comment.

Comment Letters Submitted by Agencies, Groups and Individuals

1. U.S. Fish and Wildlife Service, National Marine Fisheries Service
2. King County Department of Transportation, Transit Division
3. Seattle City Council Central Staff, Michael Jenkins
4. Seattle Public Schools
5. Feet First
6. Greater Seattle Chamber of Commerce
7. Maple Leaf Community Council, David Miller
8. Master Builders Association
9. Seattle Great City Initiative
10. Civetta Properties
11. HB Northgate LLC
12. Kauri Investments, Ltd.
13. Mullally Development Company
14. Russell Enterprises LLC
15. Wallace Properties, Inc.
16. Kathleen Braden
17. Nora Buettner
18. Shaiza Damji, 360 Degree Hotel Group
19. Marilyn Firlotte
20. Tom Banister & Genise Lee
21. Ryan Miller
22. Jena Myers, Iffert Property Management
23. Susan O'Patka
24. Peter Palmer
25. Rod Russell
26. Marvin Schmidt

27. Mari Lyn Spearbeck, T&M Jenn LP
28. Renee Staton
29. Richard Truax
30. Ruth Williams
31. Danielle Yi
32. Joan Zegree

Oral Testimony Provided at EIS Meeting

33. Carol Carnahan
34. Mary Mills
35. Renee Staton
36. Colleen Mills
37. Sue Geving
38. Gail Gautestad
39. Shaiza Damji
40. Richard Truax
41. Greg Hunter
42. John Mullaly
43. Melody McCutcheon
44. Grace Kim
45. Kevin Wallace
46. Sy Iffert
47. Barbara Maxwell
48. Ryan Miller
49. Greg Goodwin
50. Ken Meyer

June 2, 2008

Kristian,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Northgate Urban Center Rezone. The following comments are provided under the Fish and Wildlife Coordination Act by the National Marine Fisheries Service and the U.S. Fish and Wildlife Service (jointly the Services).

The DEIS analyzes rezone alternatives in the Northgate area of Seattle. The Service's review of the DEIS specifically addresses how the potential rezoning of the area could impact fish and wildlife in the area and more specifically impacts to listed threatened and endangered species.

General Comments

The Services understand that the DEIS cannot evaluate specific individual project development that may occur as a result of the proposed rezoning. The DEIS does however evaluate potential overall impacts of future development that may occur with the proposed rezoning. The Services' review also looked at overall potential impacts on the environment.

The Northgate area proposed for rezoning is approximately 98 acres that is already highly developed. This development has had significant impact on the fish and wildlife in the area. Development has resulted in loss of natural upland habitat that has been converted to impervious surfaces and landscaped vegetated areas and lawns. Development has also resulted in highly modified streams. Creeks have been altered by channelization and placing the creeks in culverts. Stream banks have been heavily armored and the hydrology of the system has been drastically changed. Impervious surfaces result in low baseflows in creeks and higher, flashy, peak flows following storm events. All these impacts have resulted in changes in the fish and wildlife that use these systems.

The Services are encouraged by some of the overall goals and objectives defined in the DEIS. For example, Section 1.2 Background, states that the City of Seattle adopted Resolution 30642 to "... integrated natural drainage strategies, sustainable design and green building..." Natural drainage systems and construction of green buildings all help in reducing urban impacts on the environment. However, these specific objectives are not identified in the overall project objectives (Section 1.3). They may be included in some of the objectives such as implementation of the City of Seattle Comprehensive Plan's goals for Urban Centers, but it is unknown. The City of Seattle is a national leader in environmental issues on avoiding, minimizing, and improving urban impacts on fish and wildlife. The Services believe the DEIS needs to describe and analyze the alternatives on how they meet the Mayor's overall objectives of improving the fish and wildlife through the Restore Our Waters initiative within the City of Seattle.

1-1 The Services recommend that a description is needed on how the rezoning alternatives will address the larger issue of stormwater management. The City of Seattle has numerous stormwater and combined sewer outfalls that during storm events discharge directly to Puget Sound, the Lake Washington Ship Canal, Lake Washington and streams and creeks within the City of Seattle. Stormwater and combined sewer outfall discharges during storm events result in significant water quality concerns. The City of Seattle is working on measures to reduce outfall discharges and an analysis is needed to show how rezoning will help reduce stormwater and combined sewer outfall events.

1-2 The DEIS states or describes in a couple locations (Section 3.7.1.1 Surface Water Regulations and Standards, and Section 4.7.1.1 No Action Impact to Water Resources) information on the Department of Ecology's water quality standards and the Seattle Municipal Code. The DEIS states that all land disturbing activities are required to comply with these regulations. Meeting Department of Ecology's water quality standards and the Seattle Municipal Code, which is currently being updated to meet the Department of Ecology's Stormwater Manual, does not always avoid, minimize, or reduce impacts to listed species. The Services have only consulted on two water quality standards, temperature and dissolved oxygen, for impacts to listed species. The Services have not consulted on potential impacts of the Department of Ecology's Stormwater Manual. Without a consultation, meeting these regulations does not necessarily meet the requirements or habitat needs for listed species.

Specific Comments:

1-3 Table 1-2, Page 1-10, Water Resources. The No Action Alternative states that the rezone study area does not include any streams. This is not consistent with Page 3-21, Section 3.7.1 which states that there are two streams located within and just outside of the rezone study area.

1-4 Table 1-2, Page 1-10, Water Resources. The No Action Alternative states "Development would be controlled by the City's Stormwater, Grading, and Drainage Ordinance, which regulates both temporary and long term impacts of development, and recently adopted regulations regulating development on peat soils. No significant impacts on water resources are anticipated as long as projects comply with these regulations. Some improvement in water quality is possible because existing development would be replaced with development that would have higher water quality and better stormwater flow control due to nature of current regulations." See comment above under General Comments about water quality standards and Seattle Municipal Code.

1-5 Table 1-2, Page 1-10, Water Resources. The Mitigation Measures and Other Means of Addressing Impacts of the Proposal column states "Project level review would include an evaluation of specific impacts on groundwater flow. If impacts are identified for a specific site, mitigation could include requiring infiltration of stormwater runoff to ensure stream flows are not reduced by new impervious surfaces." The Services believe that an overall project review and mitigation requirements need to be addressed at the larger project scale such as the proposed rezoning. Specific project level review and potential

1-5 impacts to groundwater flow as stated in the table is very difficult. Individual project review of proposed development on small parcels such as one or two acres is very hard to show specific groundwater impacts and associated decreases in groundwater flow to streams. Therefore, individual projects rarely require mitigation measures to minimize groundwater impacts. However, cumulative impacts from multiple individual projects, such as those analyzed in the DEIS can have groundwater associated impacts and mitigation measures need to be addressed on a larger scale. The DEIS should state that Low Impact Development practices such as green roofs, permeable pavement, and rain gardens will be used. Low Impact Development controls the hydrology of an area to provide storage, infiltration, and ground water recharge which benefits baseflows in streams.

1-6 Table 1-2, Page 1-11, Plants and Animals. The No Action Alternative column states that community groups have been working to restore fish and wildlife habitat in the watershed. While this is true, the City of Seattle has also been working extensively to improve fish passage and improve fish habitat within Thornton Creek. The DEIS needs to describe the work the City of Seattle has been conducting in Thornton Creek and how the proposed rezoning would benefit this work.

1-7 Table 1-2, Page 1-11, Plants and Animals. The No Action Alternative column states that long term impacts to fish habitat could occur if groundwater flow from the rezone study area is reduced due to new impervious surfaces. The Services agree with this. In addition, urbanization also causes altered stream hydrology by increasing flows during and immediately after storm events. Stream flooding increases sediment transportation through bank erosion which alters, modifies, and eliminates fish habitat. Prey species such as macroinvertebrates are also impacted through urbanization. Changes in macroinvertebrate density and diversity occur through alterations of habitat. Lower macroinvertebrate densities results in less prey available for juveniles, etc. The DEIS needs to fully analyze all potential project impacts on plants and animals, both direct and indirect effects. There are other potential impacts of the project. Increased traffic in the area results in increased pollutants to the creeks. Copper and zinc are two metals that increase in streams with increased traffic. Removal efficiencies from BMPs are difficult for these metals. The effects of pollutants on the aquatic environment from increased traffic as a result of the rezoning need to be addressed. Water temperatures and sediment input can also increase with increased impervious surface. All potential project related impacts need to be analyzed.

1-8 Section 3.7.1.1 Surface water Regulations and Standards. See comment above under General Comments about water quality standards and Seattle Municipal Code. Similar comments apply for TMDLs.

1-9 Section 3.8.3 Threatened and Endangered Species. Please update this section to include bull trout. The section should also describe designated critical habitat in the area for bull trout and Chinook salmon. Lake Washington is designated critical habitat for both species. Bull trout while never caught in Thornton Creek are assumed to utilize the creek for foraging especially in winter and early spring.

1-10 Section 4.7 Water Resources. Text states that there is no analysis for impacts to groundwater. Please see comments above for Section Table 1-2, Page 1-10, Water Resources.

1-11 Section 4.7.1.1. No Action. A cumulative effects analysis is needed for impacts of future increased development on 98 acres on the groundwater and potential impacts to baseflows in Thornton Creek. In addition, see comment above under General Comments about water quality standards and Seattle Municipal Code. Cumulatively, numerous projects less than one acre or 5,000 square feet can result in groundwater impacts that may not be seen on an individual project level.

1-12 Section 4.7.1.1. No Action. The DEIS does not analyze the potential long term impacts of proposed development on the aquatic environment. Potential impacts include increased altered hydrology due to increased impervious surface and increased contaminants especially copper and zinc from increased traffic. All potential effects of the project need to be described and analyzed.

1-13 Section 4.7.2 Mitigation Measures. The DEIS describes construction related BMPs needed to avoid, minimize and reduce impacts to the water resource, but there are no BMPs included that would reduce long-term impacts associated with hydrologic and contaminants concerns.

1-14 Section 4.8.3.1 No Action. Additional water quality analysis and project related impacts to fish and wildlife (including prey species) are needed as a result of increased traffic and contaminants. In addition, a hydrologic analysis and impacts to fish, habitat, and prey populations is needed.

1-15 Section 4.8.5.1 No Action. See comments above for Section 4.8.3.1 No Action. While listed fish species may not be in the local project area. The project has the potential to impact downstream fish habitat through decreased baseflows, altered hydrology, increased contaminants, and prey population impacts that could result in indirect effect to listed species. The Services recommend an analysis of these impacts.

Thank you again for the opportunity to provide comments on the DEIS. For any questions please give me a call.

Jim

Jim Muck
 U.S. Fish and Wildlife Service
 National Marine Fisheries Service
 7600 Sandpoint Way NE
 Seattle, WA 98115
 Phone: 206/526-4740
 Fax: 206/526-4746

Letter 1: U.S. Fish and Wildlife Service, National Marine Fisheries Service

1. The impacts and conditions identified in the comment are a result of urbanization in general, and have been occurring over the past 100 years or more in the city and region. The EIS evaluates the incremental impacts that would be associated with limited upzoning in the Northgate Urban Center. The 98-acre Northgate study area represents 0.001 percent of the City's total land area (approximately 55,000 acres). Any proposed upzoning in Northgate would reflect this historical trend and result in only an incremental increase in urban development. The EIS is not intended and not required to identify impacts or mitigation measures for city-wide or region-wide issues. The reader may wish to consult the EISs prepared for the City of Seattle Comprehensive Plan (1994) and King County's Comprehensive Plan (1994); both address impacts on a broader system-wide scale.

The Growth Management Act provides a legal mandate for cities to focus population growth in urban areas at higher densities. This focus is a means to protect rural lands, resource lands and open space. The City's Comprehensive Plan, and the proposed rezones for in Northgate studied in this EIS, reflect the City's role in this broader land use pattern.

As identified in this EIS, the rezone alternatives would result in no change in growth projections and a minor change in impervious surface in the study area. However, without knowing which sites will actually redevelop or the detailed plans of potential new development, it is not possible to identify with certainty whether there would be an increase or decrease in impervious surface. Stormwater management requirements are addressed in the City's adopted and proposed updated stormwater regulations (SMC 22.800), which are not the subject of the EIS. Future development in Northgate, with or without rezoning, would be required to apply adopted standards; there is no requirement to reduce stormwater discharge beyond these standards.

2. Your comments regarding Ecology's and the City's stormwater standards are noted; they are beyond the scope of the EIS.

3. The apparent inconsistency in these statements has been clarified in Table 1-2 in the Final EIS. The rezone study area that was originally identified does include a portion of Victory Creek located in Victory Creek Park. However, no change to the zoning was proposed for the parcel that comprises the Park. In retrospect, this parcel, which is at the eastern limit of the study area, could have been omitted from the study area, since the rezone was never intended to affect public parcels.

4. Your comment is noted. Please see the response to Comment 1 above.

5. The proposal is legislative in nature and the EIS analysis is general and programmatic in its scope and detail. At the rezone level, it is only possible to generally identify the requirements of City policies and regulations. Presently, the Seattle Land Use Code does not require implementation of low impact development techniques. However, the City is currently in the process of updating its stormwater regulations (SMC 22.800) and proposed changes would require implementation of green stormwater infrastructure, to the maximum extent feasible, for all projects with 7,000 square feet or more of land disturbing activity or with 2,000 square feet or more new and replaced impervious surface. Adoption by the City Council is anticipated to occur in Winter 2009.

In addition, such techniques could be applied in individual projects in the context of contract rezones, as envisioned by Final EIS Alternative 3.

6. The Thornton Creek Water Quality Channel is noted in Section 2.2.4 of the Draft EIS in the context of revitalization efforts occurring in Northgate. Additional information on the water quality channel may be found on the Seattle Public Utilities website:

www.seattle.gov/util/about_SPU/Drainage_&_Sewer_System/Projects/COS_00247. Please see the response to Comment 1 regarding stormwater standards. Discussion of environmental benefits is optional but is not required to be included in an EIS; a proposal is not required to demonstrate environmental benefit.

7. The list of impacts referenced in the comment are “potential” impacts; the comment similarly identifies other impacts generally associated with urbanization which could possibly occur. However, SEPA requires that an EIS evaluate “probable significant” impacts. As noted in the DEIS, any increase in impervious surface associated with the Northgate rezone alternatives is expected to be minor and would not be likely to cause the chain of events identified in the comment. Regarding the issue of non-point pollution associated with vehicular traffic, the project is not expected to increase non-point pollution in the watershed. Traffic growth is projected to occur in the Northgate Urban Center with or without the rezone. Redevelopment stimulated by the rezone would concentrate more of the expected new trips to the study area, but will not result in more vehicle miles traveled by the residents and employees expected to inhabit the urban center. If successful, the rezone would create a more walkable area where residences and jobs are concentrated near services, and thus could reduce vehicle miles travelled in the Urban Center. Furthermore, by reducing the amount of surface parking through more dense development than currently exists, these existing non-point pollution sources would likely be reduced with redevelopment, due to use of structured parking (in which drainage is directed to sanitary sewers) and stricter controls on stormwater from new development.

8. Your comment is noted. Please see the response to Comment 1 above.

9. While bull trout are a listed species, the rezone is unlikely to affect them. As mentioned in the comment, bull trout are not known to utilize the streams within and adjacent to the rezone study area. Also, as noted above and in the EIS, redevelopment under any of the rezone alternatives may result a small increase in impervious surface, but would likely result in improved water quality and less extreme runoff rates during storms due to stricter controls on stormwater from new development.

10. The referenced statement in Section 4.7 refers to impacts related to groundwater used for drinking water. The section does include a discussion of impervious surface and effects on infiltration and groundwater recharge.

11. Chapter 4 of the Draft EIS does contain an evaluation of cumulative effects. The cumulative growth assumed for this analysis includes anticipated population and employment growth in the Northgate study area under a range of rezone/land use scenarios. The incremental effects of the rezone alternatives are evaluated and are concluded to be minor. The analysis does not, cannot and is not required to evaluate the effects of city-wide or regional growth.

12. The potential for altered infiltration and water quality impacts is addressed in Section 4.7 of the Draft EIS. See response to Comment 7 above. The incremental changes in impervious surfaces associated with the rezone alternatives are not expected to result in significant effects to water quality. Water quality is also addressed in the City's stormwater regulations, which would apply to future development projects in Northgate.

13. The mitigation measures identified in Section 4.7.2 of the Draft EIS include the requirements of the City's Stormwater, Grading and Drainage Control Code, which address long-term and short-term impacts.

14. The comment is noted. The requested studies are not warranted by the magnitude and characteristics of the rezone alternatives and are not within the scope of the EIS.

15. Thank you for your comments. Please refer to the prior responses addressing these topics.



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Transit Division
Design & Construction Section
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May 29, 2008

Ms. Diane Sugimura, Director
Seattle Department of Planning and Development
700 Fifth Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124-4019

Attn: Kristian Kofod

Subject: Northgate Urban Center Rezone Draft EIS

Dear Ms. Sugimura:

King County Metro Transit Division staff reviewed the draft EIS for the Northgate Urban Center Rezone project and we have the following comments.

- 2-1 King County supports increased density in the Northgate area with a residential focus. We recommend the consideration of even further increases in residential density in the study area and further south of Northgate Way within the core area. We suggest that increases beyond one incremental level be considered. Housing at the mall could be a consideration.
- 2-2 The alternatives do not consider changes to areas zoned single-family, and this seems appropriate. However, the City could consider a proposal to allow detached accessory dwelling units and cottage housing with shared parking in select single-family areas close to bus service with 15-minute headways. Areas with 15-minute headway service (midday) include College Way/Meridian Avenue North, NE Northgate Way, 5th Avenue NE, and on 15th Avenue NE.
- 2-3 The construction of sidewalks along 1st Avenue NE (between NE 92nd and 100th streets) and 15th Avenue NE (between about NE 90th and 115th streets) would support increased pedestrian activity and transit use and should be a priority, with funding possibly from developer's fees.

Thank you for the opportunity to comment on this proposal.

Sincerely,

Gary Kriedt
Senior Environmental Planner

Letter 2: King County Department of Transportation, Transit Division

1. Your comments supporting increased density with a residential focus, including areas south of Northgate Way, and increases beyond “one incremental level” of zoning are noted.
2. Your comments supporting no rezones in single-family zones, but consideration of detached accessory dwelling units and cottage housing in select single-family areas near 15-minute bus service corridors, are noted.
3. Your comments supporting construction of sidewalks along portions of 1st Avenue NE and 15th Avenue NE, to support increased pedestrian activity and transit use, and support for funding options that include developer fees, are noted. Please note that other actions proposed under any alternative contemplate adoption of a Voluntary Traffic Mitigation Payment Program to help fund traffic transportation.

3-1 [Page 2-2. It should be noted that the proposed rezone north of the park does not meet Comprehensive Plan policies that call for buffering and transition zones. By introducing a commercial zone to the north of the park, which is currently residential, it runs counter to current zoning that steps down in intensity away from Northgate Way. Such an approach creates more impacts where the need for such additional impacts is not clear, other than benefiting a single property owner.

3-2 [Page 2-12. Construction related impacts should be evaluated, including impacts arising from multiple projects under construction on adjacent sites and their impacts on traffic and noise.

3-3 [Page 3-17 – what are the existing Level of Service (LOS) conditions at 8th and Northgate Way – these are not documented.

3-4 [Pages 4-1 through 4-11 – there are analyses provide detailing percentage of commercial and residential growth that seem misstated. Some of the figures exceed 100% within a subarea, the percentage figures do not total 100%

3-5 [Page 4-25. Some shadow diagrams related to the park and potential height of density under the different rezone proposals should be included

3-6 [Page 4-51. The transportation analysis should include an examination how North Seattle Community College growth plans could affect traffic.

3-7 [Page 4-74. This section provides the analysis of transportation impacts related to all of the alternatives along with a series of mitigating measures to reduce traffic impacts at key intersections. What is not clear is what specific triggers will link mitigating measures to new development. Some additional information should be provided that links specific development parameters (number of dwelling units, increase in traffic signal delay, size of commercial spaces, etc) to specific performance of mitigation measures.

3-8 [Page 4-82. The Air Quality mitigation efforts should include transportation demand management programs.

Michael Jenkins, City Council Central Staff

Letter 3: Seattle City Council Central Staff, Michael Jenkins

1. Your comment is noted. Potential land use conflicts between intensive commercial development and lower density residential uses are identified in Section 4.1.1 of the Draft EIS. Final EIS *Alternative 3 - Urban Design Framework*, illustrated in Figure 2-6, would modify the extent of properties being considered for contract rezones, and would exclude most lower density multi-family residential properties at the edge of the study area. This would help create or retain more gradual transitions between more intensive development in the Urban Center and adjacent lower density residential areas.
2. Construction-related impacts are disclosed in Chapter 4 of the Draft EIS for relevant elements of the environment. This includes identification, on page 4-2 for example, of “short-term direct impacts to adjacent land uses, such as noise and dust from construction equipment and disruption of local traffic.” The timing of any redevelopment is uncertain since it would be driven by market conditions and the decisions of private property owners. It is possible that two or more projects could be developed concurrently; more detailed information regarding construction timing is not available. Regardless, the previously quoted identification of impacts would also apply to a situation where multiple projects were developed concurrently. The magnitude of such impacts cannot be identified at this time, however.
3. Level of service is calculated only for signalized intersections. The intersection of 8th Avenue NE/Northgate Way is not currently signalized and, therefore, was not included in Table 3-6, which shows existing conditions. Levels of service for this intersection are estimated for 2030, when this intersection would be signalized.
4. The percentage amounts referenced in the analyses on Draft EIS pages 4-1 to 4-11 are not misstated, and are not the sort of calculations that must add up to 100% for a given alternative. Rather, the percentages help to compare the magnitude of increased capacity for growth within each sub-area among the alternatives, by relating them to the total employment and residential growth target amounts for 2024 in the Urban Center. The sub-areas in the rezone study area represent only a portion of the entire Urban Center; housing and employment growth will also occur in other portions of the Urban Center. Other data in the Draft EIS may provide a better picture of the relationship of the rezone alternatives to the larger Urban Center. For example, Table 2-2 in the Draft EIS identifies adopted growth targets for the entire Urban Center, and Table 2-3 shows the capacity for housing and jobs that would be created by each rezone alternative within the study area, which is only a portion of the Urban Center.
5. A shadow analysis is included in Section 4.3 of the Draft EIS, although graphics were not prepared. The Final EIS Chapter 3.3 provides shadow analysis graphics and supplemental discussion of shadow reports.
6. The Seattle Transportation Model that was used for the EIS includes growth assumptions for North Seattle Community College. Projected growth is based on the College’s adopted institutional master plan. The College is planning to begin an update of its plan next year.

7. As used in the comment, the term “trigger” is assumed to mean a specific quantity of cumulative growth that indicates the need to implement an improvement. The City’s approach to monitoring traffic growth and identifying mitigation needs does not rely explicitly on the use of triggers. The CTIP identifies a time period by which improvements will need to be in place to maintain level of service targets. This scheduling of improvements is based on assumptions about the type, rate and location of projected growth. The City monitors actual and planned growth relative to these assumptions to determine when improvements will be needed. Improvement projects are then funded through the CIP, designed and implemented. SEPA review and traffic analysis of individual project proposals are related tools used to compare planned improvements to the timing of development.

8. Your comment is noted. Adopted City regulations require implementation of transportation demand management programs in specific situations. As noted on page 4-83 of the DEIS, no mitigation measures are proposed beyond typical construction-related mitigation measures. The air quality analysis concluded that no significant impacts related to the rezone alternatives would occur. Therefore, mitigation measures are not warranted or proposed.

May 29, 2008



Kristian Koford
City of Seattle Department of Planning and Development
P.O. Box 34019
700 Fifth Avenue, Suite 2000
Seattle, Washington, 98124-4019

RE: Written Comments – The Northgate Urban Center Rezone Draft Environmental Impact Statement

Dear Mr. Koford:

The Northgate Urban Center Rezone Draft Environmental Impact Statement provided a programmatic or plan-level analysis of the elements of the environment that the City of Seattle identified as having the greatest potential for adverse effects by the proposed alternatives. Elements of the environment reviewed included: Land Use, Housing, Aesthetics, Recreation, Transportation, Air Quality, Water Resources, and Plants and Animals. Each Urban Center alternative was analyzed to determine its potential affect on these elements.

The purpose of the Programmatic Draft EIS is to provide a range of alternatives, identification of impacts, and which alternative or parts of an alternative have significant impacts which may present fatal flaws. The resulting analysis is to provide mitigation measures that provide overall solutions to the significant impacts that can not be mitigated on an individual project level, but must be addressed at the programmatic level to be effective.

Based on these general statements, Seattle Public Schools has identified the following areas that are "fatal flaws" in the Northgate Urban Center Rezone Draft Environmental Impact Statement:

Schools:

- The Growth Management Act is the foundation of all land use planning in Washington State dictates that adequate public services must be available prior to development occurring. The proposed policy changes may have a significant adverse impact on Seattle Public Schools ability provide educational facilities to residence of the area.
- Seattle Public Schools' 2020 Facilities Master Plan calls for significant growth and over crowding in northern Seattle. No analysis was done on the impact on north end schools related to these proposed land use and zoning changes.
- If the City of Seattle is going to re-direct population growth by major land use and policy changes, they should as part of this Draft EIS explain how these policy changes will

impact shifts in population growth trends and the impacts this has on Seattle Public Schools.

- If there is a significant impact on Seattle Public Schools based on the programmatic analysis, what are the programmatic mitigation measures that need to take place prior to the impacts occurring?
- In addition, school programmatic impacts must address either the increase or decrease in students based on individual alternatives and individual school clusters.

Land Use:

- The Northgate Urban Center Draft EIS assumes in each of the alternatives that free market forces will not exist within the Northgate Overlay District and that all future growth for higher density development will shift from the Overlay District to the Northgate Core Area with no overall future change in the total number of households for the Overlay District.
- This is a faulty assumption, since multi-family property owner and potential renters/owners of these units in a free market will still desire to develop or re-develop their properties over time as well as future multi-family residents demanding alternative living environments and locations within the Overlay District.
- Why was no analysis done on land use impacts and associated demographics if higher density occurs within the Northgate Core and the City still sees free market forces causing continued growth in the Northgate Overlay District and the Northgate Core Area simultaneously? What impact will this have on Seattle Public Schools?

Transportation:

- The transportation analysis within the Draft EIS for the Northgate Urban Center Rezone is based on traffic data generated as part of the Northgate Coordinated Transportation Investment Plan (CTIP) which is a programmatic plan over four years old.
- Why was 2004 base date used for the analysis of this critical element when the City of Seattle has more current traffic data for this area?
- Since the CTIP programmatic plan was adopted, several major new developments have occurred in the Northgate area including the expansion and renovation of Northgate Mall along with the defeat by voters for a major transportation improve bond that included many major CTIP projects. Why is the City of Seattle unwilling to demonstrate as part of this Draft EIS that the CTIP assumptions are correct four years later using more recent traffic data information?

4-4

- How would the Level of Service (LOS) at the key intersections identified in the Draft EIS change if the most current traffic data is used and a major CTIP projects are not funded by voter approval?

Surface Water:

4-5

- Seattle Public Schools is very concerned with surface water runoff on downstream properties like Nathan Hale High School during 100-year and 500-year storms. With Nathan Hale High School adjacent to Thornton Creek, we have seen increased flows during major storms and significant damage to our facilities due to lack of upstream retention and detention. This is a regional issue (programmatic) rather than an individual project level issue. Where are the programmatic mitigations identified in this Draft EIS?
- In addition, increase down stream flows can cause greater erosion and property loses. What programmatic mitigations are proposed to maintain existing seasonal flows in addition to insuring acceptable seasonal water temperature for migrational spawning areas?

Thank you for the opportunity to comment on this document. We look forward to reviewing your response.

Sincerely,



Ronald J. English
Deputy General Counsel
Real Estate Property Manager

cc: Kathy Johnson
Paul Wozniak

Letter 4: Seattle Public Schools

1. A worst case analysis is required by SEPA only in limited circumstances defined in RCW 197-11-080 and SMC 25.05.080. Those circumstances are not applicable to the Northgate rezone alternatives, and a worst case analysis is not required. Comprehensive Plan Policy UV40 states that growth targets are intended to be used only as a guide and do not establish growth limits. The alternatives are consistent with the City's adopted growth targets for Northgate, if those projections were extended to 2030 and if Northgate received the same relative allocation of population. The City has not yet updated its Comprehensive Plan to extend the targets; the 2030 household assumptions are based on analysis in the CTIP.

Focusing future growth within designated Urban Centers, such as Northgate, is a fundamental principle of the Growth Management Act and the City's Comprehensive Plan. The effects of focusing or redirecting growth in this manner were evaluated in the EIS prepared for the City's Comprehensive Plan (1994). That EIS evaluated the impacts of growth on the School District. As described in Chapter 2 of the Draft EIS, the only redirection of population growth associated with the rezone alternatives is assumed to be a shift within the Northgate neighborhood to redirect an additional increment of growth to the Urban Center adjacent to Northgate Way. This is assumed to be a function of market forces, which would be attracted by the additional development capacity that could be available through rezones (either legislative or quasi-judicial). This could result in slower growth in one portion of the Northgate neighborhood and more growth in another. This shifting could affect attendance at individual schools. In general, the rezone alternatives for the Northgate Urban Center are not viewed as major or fundamental policy changes. Rather they represent potential changes in zoned density and intensity and refinements to land use regulatory techniques that could help achieve the policies established in the Comprehensive Plan, including the Northgate Neighborhood Plan Element. The proposed Comprehensive Plan amendment similarly does not represent a change in policy. Please note, however, that Sections 4.1 and 4.2 of the Draft EIS do disclose the possibility that the stimulus provided by rezones could result in a greater than projected amount of growth or a faster rate of growth. If this occurred, it is assumed the City would propose any necessary changes to capital facility plans to accommodate this growth, as required by the Growth Management Act.

2. The rezone alternatives do not assume that the free market will not exist; on the contrary, rezoning in Northgate is seen as a means to attract the real estate market to certain locations and to influence the type and form of development. The rezone alternatives assume that the incentive provided by upzoning – whether through legislative action or contract rezones – will attract and focus growth within the Northgate Urban Center. Whether or not this occurs, however, would depend on the actions of individual property owners, who will decide whether or not to take advantage of the increased intensity available through rezoning. Alternative 3, in particular, would defer to economic markets and individual property owner decisions to determine when and if rezones are economic to pursue.

The analysis does make some reasonable assumptions about properties within the study area that are considered most likely to redevelop in the near- and mid-term. These assumptions are based on documented ratios of land-to-structure values, recent development trends, known opportunity sites, and similar factors as indicia of a property's likelihood to redevelop; the methodology is described

in Appendix A of the Draft EIS. This methodology is commonly used by cities within King County for projecting redevelopment and evaluating future land use. It does not suggest, however, that these properties will in fact redevelop or that other or additional properties could not redevelop; individual property owners are able to propose rezoning of their properties, consistent with City requirements.

3. The 2004 base year was used to remain consistent with the assumptions and analysis in the Northgate Coordinated Transportation Investment Plan (CTIP). The analysis considered known and proposed development projects within the study area, including those mentioned in the comment. CTIP was a multi year planning effort and used the most current information available at the time it was undertaken. An EIS was prepared for CTIP and was not challenged; it is still considered to be an accurate analysis of existing and future traffic conditions. Sources of funding for CTIP projects are described in those documents. The possible rezones studied in the EIS are intended to build on this prior planning and analysis. For the present EIS, the CTIP's assumptions and data were reviewed and verified; the EIS is not required to test or challenge either those assumptions or elements of other adopted city programs.

4. Significant changes in the funding or implementation of Northgate transportation improvement projects could result in additional mitigation being required for individual projects. SEPA review for future projects would determine whether planned improvements are on track and whether adopted levels of service objectives and concurrency requirements will be maintained. Please note that Final EIS Alternative 3 includes a transportation mitigation payment program; refer to the description in FEIS Chapter 2, Section 2.5.3.4.

5. The City's stormwater standards will be updated imminently. These are city-wide standards and not specific to Northgate, but are assumed to provide adequate mitigation for the minor increase in impervious surface and runoff that could be associated with difference in future developments due to the rezone alternatives.



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June 9, 2008

City of Seattle Department of Planning and Development
PO Box 34019
700 Fifth Avenue, Suite 2000
Seattle, Washington 98124-4019
Attn: Kristian Kofoed

Dear Mr. Kofoed:

Feet First is pleased to provide comments on the Northgate Urban Center Draft EIS (DEIS) plan. Feet First is the region's pedestrian organization using an effective measurable combination of outreach, advocacy, research, education and social marketing to build walkable communities. Over the last twelve years, Feet First has become recognized leader locally and nationally on pedestrian issues. We have reviewed the Northgate Urban Center Draft EIS plan and have identified some key areas of concern.

A vital element in the planning and design of urban centers such as Northgate is walkability. The more personal trips people can make on foot, the less traffic added to the road network. Although the vehicle trips displaced by walking are of relatively short length, walking trips still have a significant impact on reducing traffic congestion at critical chokepoints such as Northgate Way. Since much of the air emissions from vehicles are a function of the number of trips, rather than their length, eliminating short auto trips can also yield significant air quality benefits. Moreover, walking is a healthy and enjoyable way of getting around, which should be encouraged and supported as part of the City's efforts to become the most walkable city in the nation. Pedestrian-friendly design is critical to realizing these benefits.

The Northgate area has several inherent features that currently discourage pedestrian circulation. Unless these problem areas are remedied, Northgate will never become a walkable community. The rezoning proposed for much of the Northgate area provides an excellent opportunity to resolve some of these deficiencies. The DEIS discussion of pedestrian issues is currently inadequate, and needs to be expanded to address these underlying problems.

While recognizing I-5 as an important north-south vehicle throughway, it also effectively divides the urban center in two, separating North Seattle Community College and Northwest Hospital from the area surrounding Northgate Mall. Currently, the main pedestrian access across the freeway is the Northgate Way under-crossing of I-5. While Feet First generally supports the proposed pedestrian improvements listed in section 4.5.1.1, we have questions about

5-2 project C-7, which would relocate the sidewalks along Northgate Way under the I-5 overpass to behind the support columns. This is listed as a "pedestrian safety" measure, however this change is driven more by the need to create room for extending a westbound left turn lane on Northgate Way. Is this modification really an improvement from the pedestrian point of view? On the one hand, placing the sidewalk back behind the columns increases separation from the roadway and on the other hand this significantly reduces walkway visibility. People generally do not feel comfortable walking along dark, secluded pathways, there needs to be more of an explanation of why this change is considered an improvement for pedestrians, and how the reduced visibility can be mitigated. Feet First also strongly supports additional sidewalk projects to complete the walkway network throughout the Northgate area.

5-3 The Northgate area is laid out with exceptionally large superblocks, making pedestrian circulation difficult. Specifically, the four large blocks in the area defined by 5th Avenue NE, NE 105th Street, Roosevelt Way NE, and NE 115th Street discourage east-west pedestrian movement. The Northgate Open Space and Pedestrian Connections Draft Plan (NOSPC) recognizes this problem, and recommends the creation of internal walkways to create a more finely-grained pedestrian network. To this end, developers within the rezone area should provide mid-block east-west walkways roughly aligned with NE 107th Street and NE 112th Street from Roosevelt Way to 5th Avenue NE. Crossing facilities including pedestrian-activated signals should be provided as appropriate across 5th Avenue NE, 8th Avenue NE and Roosevelt Way. Feet First strongly recommends including such walkways within the package of public amenities provided by developers in exchange for higher zoning densities.

5-4 Currently, the Northgate Way underpass is the only pedestrian connection between North Seattle Community College and the main part of the Northgate Urban Village. This connection is neither direct, nor attractive for pedestrians. Consequently, students and employees of the community college are more likely to drive to Northgate for shopping and dining, thereby contributing to traffic congestion along Northgate Way. Feet First strongly recommends consideration of a new pedestrian-only bridge directly connecting the Northgate Transit Center to the community college, as recommended in the NOSPC. Although this proposed facility is physically outside the rezone study area, the reduction in vehicle trips along the Northgate Way corridor will assist with alleviating the congestion resulting from development.

5-5 Feet First is encouraged by the movement towards a more transportation friendly urban design model in the Northgate Urban Center Draft Environmental Improvement Study. However, on behalf of Feet First, more needs to be done to make this a more functional plan for the community. Thank you for the opportunity to comment on this plan. Should you have questions about a particular comment feel free to contact me directly by calling 652-2310 or by emailing lisa@feetfirst.info

Sincerely,

Lisa Quim
Executive Director

Letter 5: Feet First

1. Your comments about the positive effects of pedestrian travel on air quality, vehicle trip volumes, and public health, and the importance of pedestrian-friendly design in Northgate are noted. Please refer to Final EIS Alternative 3, which includes strategies to enhance the pedestrian environment/connections, and encourages site and building design that reinforces the pedestrian environment and encourages bicycle travel. Final EIS Alternative 3 also contemplates adoption of new streetscape standards for 3rd Avenue NE and 8th Avenue NE in the City's Right-of-Way Improvement Manual.
2. Your comments about pedestrian movement barriers in Northgate, such as I-5, and your comments critical of the design specifics of planned improvements to the I-5 underpass at Northgate Way (project C-7 in the CTIP) are noted. The referenced transportation improvement projects were previously subject to SEPA review in the prior EIS on the CTIP. They are not part of or an element of the rezone.
3. Your comments recommending the creation of internal public walkways on large properties and improved crosswalk facilities within this portion of Northgate, for the purposes of creating a more finely-grained pedestrian network, are noted. The EIS Alternatives anticipate that the City will propose incentive zoning provisions specific to Northgate, and that such incentives could include bonus provisions related to pedestrian circulation. Potential revisions to the Northgate Overlay District and Neighborhood Design Guidelines could also address pedestrian and bicycle improvements.
4. Your comments supporting a future pedestrian-only bridge across I-5 to connect the transit center to the community college with associated pedestrian and vehicle traffic congestion benefits are noted.
5. Your comment supporting a more complete and functional pedestrian improvement plan that will be successful in this area is noted. Please note that the Seattle Department of Transportation has developed a city-wide Pedestrian Master Plan, which was considered by the City Council in the fall of 2009. Additional information is available on SDOT's website.
http://www.seattle.gov/transportation/pedestrian_masterplan/default.htm



June 14, 2008

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Mr. Kristian Koford
Department of Planning and Development, City of Seattle
P O Box 34019
Seattle, WA 98124-4019

Dear Kristian,

The Chamber's Land Use and Development Committee has reviewed the Northgate Urban Center Draft Environmental Impact Statement ("DEIS") and offers the following comments for your consideration.

We are pleased that the City is proceeding with a rezone to increase density at Northgate. As recognized in the DEIS, Northgate presents a unique opportunity to add density in close proximity to a transit center and regional shopping center. As we all recognize, development at Northgate was stymied in the past for a number of reasons, including that fact that certain land use regulations served as a true disincentive to development. The unfortunate result was that few residential units, and only a modest amount of commercial uses, were added to Northgate. Only when the regulatory environment changed (aided substantially by the City's investments in Northgate), did this important Urban Center start to grow and contribute to the City's planning goals and growth targets.

As the rezone is considered further, we urge the City to recognize all the collateral benefits of increased density at Northgate, without imposing a layer of new regulations that will thwart redevelopment and endanger the ability to meet City planning goals and growth targets. We support the (housing-centered or commercial-centered) broad rezone option. Given that single-family areas would remain untouched under any of the three rezone options, a broad rezone makes the most sense for maximizing the unique opportunities at Northgate. The broad rezone would also allow Northgate to absorb the growth anticipated in coming years.

Consistent with the above comments, we urge the City to decouple "incentive zoning" from the rezone. The DEIS makes a modest statement suggesting that "incentive zoning" may have a negative impact on whether redevelopment occurs, based on a study by Heartland. We have examined that study and discovered that it directly raises the concern that incentive zoning will actually be a disincentive to achieving needed density at Northgate. In other venues, the Chamber has observed that incentive zoning has no downward effect on housing costs, and instead, passes the cost of affordable units to unsubsidized ones. The additional concern at Northgate is that this new program will discourage growth in this critical Urban Center.

With these viewpoints as the backdrop, we ask DPD to address the following topics in the Final EIS:

- Instead of just assuming that "incentive zoning" will lead to a certain number of affordable units being built, also assess to what extent "incentive zoning" adds costs to non-subsidized units and can act as a disincentive to development.

Comment Letter No. 6

Comment Letter No. 6

- The DEIS rarely acknowledges the benefits of increased density. In fact, the entire issue of Greenhouse Gas Emissions is deferred to the Final EIS, even though every permit applicant subject to SEPA must do a Greenhouse Gas assessment for review by DPD. The Final EIS should at least qualitatively describe how the land use choices posed by the alternatives can affect Greenhouse Gas Emissions. For example, by allowing Northgate to absorb an increased amount of the growth targeted for the City, in close proximity to transit and shopping, it is reasonable to posit that this is superior to increasing density in non-Urban Center locations. Under the Lieberman Warner Climate Change bill pending in the Senate, a credit or offset to caps on Greenhouse Gas can be allowed for land use decisions that reduce Greenhouse Gas Emissions. (See www.rff.org/climatechangelegislation for more information.)

- Another example of the benefits of redevelopment is in the area of stormwater. Nearly all of the development at Northgate was built under stormwater regulations that lacked an environmentally-friendly focus. To the extent the rezone encourages development, that development will need to comply with modern stormwater regulations which add numerous environmental benefits.

Thank you for considering our comments. We look forward to working with you as you finalize the details of the Northgate rezone proposal.

Sincerely,

Melody McCutcheon
Melody McCutcheon
Chair, Land Use and Development Committee

Letter 6: Greater Seattle Chamber of Commerce

1. Your support for increased density and a broad rezone is noted.
2. Your comments related to incentive zoning and its potential to discourage growth are noted.
3. Incentive zoning is a separate and independent program that was adopted by the City of Seattle in December 2008. It is focused on providing affordable housing and would apply to all rezones city-wide. Further discussion of an adopted regulation in this document would serve no purpose. The Heartland study did discuss the possibility that incentive zoning could act as a disincentive in some cases, depending on the economics of individual properties, and that the desired intensification of development might not occur. Note that the Final EIS alternatives, described in Chapter 2, include a proposal to develop incentive zoning provisions specific to Northgate. Bonus provisions could include pedestrian connections, streetscape improvements, plazas, and sustainability features, in addition to affordable housing, for redevelopment projects at heights above 85 feet.
4. Your comment about the benefits of increased density is noted. SEPA allows but does not require discussion of beneficial impacts. However, some of the positive impacts of developing at higher intensities in Urban Centers are mentioned in passing in Chapter 2 of the Draft EIS.

Your comment also addresses greenhouse gases. One of the underlying principles of current planning in the Puget Sound region – embedded in the Growth Management Act and Seattle’s Comprehensive Plan -- is that concentrating growth in cities and in designated Urban Centers, in compact patterns and at higher densities, will encourage greater use of transit and non-motorized forms of travel, compared to dispersing similar amounts of growth in suburban locations at lower densities. At a regional level, this concentration would be likely to reduce vehicle trips and thereby reduce associated vehicle emissions generated by commuting and other travel. In general, any of the Northgate rezone alternatives would represent a more efficient growth pattern compared to sprawl.

Carbon dioxide is the greenhouse gas most associated with the forms of human activity described above and global warming; transportation activities are the largest source of carbon dioxide emissions from fossil fuels. A recent article in *Urban Land* magazine (Jeffrey Spivak, What Carbon Studies Tell Us – So Far, October, 2008) discusses three recent regional studies that showed that U.S metropolitan areas with higher densities, mixed and connected land uses, and less sprawl have lower carbon emissions. Smaller, higher density, and attached housing types also tend to reduce emissions associated with residential development.

Northgate is designated as an Urban Center and is considered appropriate for more concentrated, higher density residential and employment growth that is well served by transit and within walking distance of a broad range of services and jobs. This land use pattern is per se more efficient and would generate less vehicular emissions compared to a more dispersed land use pattern with less access to transit.

The Northgate alternatives evaluated in the Final EIS provide different types of redevelopment incentives, including rezoning, that could attract some planned growth from the larger Northgate planning area and concentrate it along the Northgate Way corridor in a more compact form. This concentration, coupled with enhanced transit and pedestrian access, could result in a modest reduction of vehicle miles traveled by future residents of the planning area; the extent of any reduction would depend primarily on how many residents chose to use public transit or non-motorized forms of travel. But, since all the alternatives are based on a relative focus of growth within the Urban Center, the reduction in vehicle miles traveled/greenhouse gas emissions for any individual alternative is likely to be incremental and difficult or impossible to quantify.

Growth would be relatively more dispersed under the No Action Alternative (existing zoning) and there would likely be less use of public transit. As identified in the Draft EIS, it is possible that population growth under the No Action scenario could be attracted to more suburban locations where land is less expensive, where potential profits from development are greater, and where densities are lower. This would also increase commuting distances and decrease transit use, compared to more concentrated land use patterns. The difference in emissions among the other rezone alternatives is likely to be marginal, however, varying primarily with transit use. Other things being equal, those alternatives that achieve the greatest concentration of land use and the greatest use of transit would also be likely to generate lower greenhouse gas.

It is acknowledged that the foregoing response addresses greenhouse gas emissions at a general level. This is considered to be an appropriate level of detail, however, given the broad nature of the alternatives, the lack of detailed information about likely redevelopment and the lack of tools currently available to analyze and quantify such emissions. It is also consistent with the City's SEPA rules (SMC 25.05), as discussed further below. While the City of Seattle has developed a GHG emissions worksheet for proposals subject to SEPA, the worksheet is by its terms applicable to "development projects" where building and construction types are known. (http://www.seattle.gov/dpd/Publications/Forms/Land_Use/default.asp)

That level of detail is not known for the Northgate alternatives, which are non-project in nature (See SMC 25.05.080 regarding incomplete/unavailable information). The City's rules also recognize that less detailed information is typically available for non-project proposals and provides the lead agency with more flexibility to address environmental issues (SMC 25.05.442). The broad response provided herein is consistent with that flexibility. Additional review of GHG emissions would occur at the project level, when building parameters are known.

Other information that might be used to evaluate greenhouse gas emissions at a greater level of detail for the EIS alternatives is not available, not practical to obtain at reasonable cost, would be speculative in nature, and is not essential to the City's decision (See SMC 25.05.080(C)1). The relative density and concentration of growth associated with the Northgate alternatives, coupled with the general relationship between these factors and emissions noted above, provides decision makers with general information about the relative effects on greenhouse gas emissions.

In some situations where information is lacking or unknown, the City's SEPA rules require that the lead agency include a "worst case analysis" in its EIS (SMC 25.05.080 (C) 1). Within the alternative courses of actions being considered the City in regard to Northgate as described in the EIS, the No Action Alternative serves the function of a worst case assumption with respect to

greenhouse gas emissions. As noted previously, growth under the No Action Alternative would be relatively less concentrated, less compact and less dense than the other alternatives, would foster less transit use, and would be likely to generate somewhat higher greenhouse gas emissions.

5. Your comments on the prospective environmental benefits of improved stormwater controls with future development are noted. Please see the responses to Letter 1 for additional information on environmental impacts related to stormwater drainage.



Maple Leaf Community Council
P.O. Box 75595
Seattle, Washington 98175-0595

June 17, 2008

Ms. Diane Sugimura, Director
City of Seattle Department of Planning and Development
PO Box 34019, 700 Fifth Avenue, Suite 2000
Seattle, Washington 98124-4019

Re: Northgate Urban Center Rezone DEIS

Dear Ms. Sugimura:

Greetings from the Maple Leaf Community Council. Our representatives were involved in the development of the Northgate Area Comprehensive Plan (NACP) and have actively participated in multiple related subsequent planning initiatives since the plan's adoption in 1993. Based on this informed background, it was with interest and concern that we reviewed the rezone proposal. Decisions affecting the Northgate Core also directly impact the livability of the single-family neighborhoods included in the Northgate Overlay District.

We offer the following observations, comments and questions:

- 7-1 • The City states that it wants to ensure that "recent momentum" generated by the Northgate Mall expansion, the Lorig and Wallace developments and various publicly funded projects is sustained. Overall objectives include implementation of the City Comprehensive Plan and the NACP vision. All of these projects were approved under the existing zoning. There is no reason to conclude that rezones are needed to attract future development to continue momentum begun under current zoning.
- 7-2 • The DEIS states that "the Urban Center has sufficient zoned development capacity to accommodate Northgate's population and employment targets" and is "on track to achieve its targets" and "accommodate significant future growth, based on growth targets in the Seattle Comprehensive Plan 2005 Update." In fact, the DEIS states that the "Northgate area has more capacity for development than is needed to accommodate the goals." Under the No Action Alternative, "growth in housing and employment would likely continue at rates that are consistent with the Northgate Comprehensive Plan and CTIP assumptions." There is no reason to conclude that rezones are needed to achieve either the City Comprehensive Plan or the NACP growth targets.

To: Ms. Diane Sugimura
From: Maple Leaf Community Council
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- 7-3 • On the other hand, the DEIS notes that the rezone could potentially stimulate additional growth and exceed the 2030 projections. Under the Broad Rezone Alternative/Residential Focus, for example, there could be 64 percent more housing units developed and a 200 percent increase of commercial development over the growth allowed under the current zoning. Even the focused rezone alternative would allow for an increase of 40 percent over the No Action Alternative for residential capacity, and 146 percent over the No Action Alternative for commercial capacity. Rezones could result in density increases that are inconsistent with both the City Comprehensive Plan and the NACP.
- 7-4 • DPD should include all preliminary planning and environmental analyses prepared to help define the parameters of the Northgate Urban Center alternatives in the EIS, including but not limited to, the analyses Mirai did on the effects of rezoning on key intersections, the City's land capacity data and the Heartland real estate market analysis.
- 7-5 • Northgate property owners could have developed their properties within the limits in place any time they chose to during the past decade. We reject the DEIS statement that the NACP requirements were duplicative, costly, time consuming, or a disincentive to developing large properties. If a property owner presented plans that met NACP requirements, they would have been approved. The end result regulatory changes to the NACP that were adopted by the City and applied to the Northgate Mall expansion speaks for itself. — ?
- 7-6 • The City made other regulatory changes, such as reducing NACP open space requirements and eliminating parking requirements in Urban Centers. The EIS should include the value private property owners gained by these regulatory changes.
- 7-7 • The rezone proposal is inconsistent with the NACP policy that the most intensive and dense activities should be concentrated within the defined Core Area. The broad and focused rezone alternatives expand the NACP-defined core area around the edges and in so doing, compromise the NACP policies and goals pertaining to transitioning and buffering. Increasing zoning intensity and allowed heights on the edges throughout the study area will most definitely have a significant impact to adjacent single family properties.
- 7-8 • The Northgate Stakeholders Group should not function as the sole mechanism for "meaningful community involvement" in Northgate-related matters. To who are the members of this group accountable and how are they made accountable? In Maple Leaf, we have about 4,000 residences and businesses. Maple Leaf produces a quarterly newsletter that is hand-delivered to all, hosts a web site and holds quarterly public meetings so our representative to the Northgate Stakeholders is held accountable in multiple ways. Yet some Stakeholder representatives have a singular, vested and financial interest in the outcomes of Stakeholder advice, particularly with respect to rezones. The EIS documents should include information identifying which members of the Northgate Stakeholders Group participated in the rezone design charette, in drafting and/or approving of the Stakeholder Advice Memo and which representatives are also property owners in the rezone study area. There is quite a difference between the design charette general notion of increasing density and height along the Northgate Way corridor and adjacent to I-5 and extending

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the rezones and commercial uses off Northgate Way. We are not aware that the Northgate Stakeholder Group provided guidance and monitoring of the development of the Draft EIS. All communications, memoranda, email messages or documentation of any kind between a Northgate Stakeholder and the City with respect to the rezone proposals should be a part of the public record. There are well-established mechanisms for community involvement and "meaningful community involvement" should include regular contact with community councils and district councils. The public notices pertaining to the rezone proposal appear to have met the minimum SEPA requirements but did not meet the intent of Council with respect to ensuring meaningful community involvement. We hereby request that the City cease and desist from using the Northgate Stakeholders Group as the sole clearing house for "advice" on Northgate-related matters and that the City engage directly with the Maple Leaf Community Council and other community councils within the Northgate Overlay on this and future matters.

• The DEIS also states that the market for housing in the Northgate Urban Center is still relatively young and that its "maturity will be proven based on the success of current mixed-use projects". We think that the experience with the new housing in the Lorig and Wallace projects will inform future development decisions at Northgate. We think it is a mistake to exclude the Northgate Mall property from consideration as a potential site for future housing. There are still excellent development opportunities remaining in that superblock that would be ideal for housing above commercial, especially along Northgate Way east of 3rd Avenue NE, along 5th Avenue NE and along NE 103rd Street between 5th Avenue NE and 3rd Avenue NE. It was a great disappointment to us that Simon Property Group could not be persuaded to take full advantage of the zoned capacity of their property and include housing in their initial expansion plans. We also think that it is a mistake not to take into account during the planning and DEIS the potential for housing that could be included in King County's future Transit Oriented Development at Northgate. We have heard a King County representative state that King County would like a rezone of their Northgate property to allow for heights up to 200 feet. If that is the case, then the potential number of residential units on that site should be taken into consideration for future growth planning.

• Time and time again, we have been told that the City can not force a property owner to do anything. There is no way that the City can ensure that the proposed rezones would result in anything but more intensive commercial uses and removal of hundreds of existing affordable residential units. If the City finalizes the incentive program and if a property owner participates and decided to locate the units on site, the few "affordable" units (probably near market-rate) to be provided will never replace the existing units. Data in the DEIS about rental rates differs significantly from data included in the Seattle Planning Commission's Affordable Housing Action Agenda (February 2008). In that report, average rent in Seattle for 20+ unit properties in the Fall of 2007 was \$1,052. The DEIS reports that rents for studio apartments at Northgate Apartments and McGuire Court begin at \$645 and \$675 per month. The DEIS reports that monthly housing costs that would be affordable to a low-income household, defined as earning 50 percent of the median household income (\$27,557) would be approximately \$689 per month. It states that "many and possibly all of the units that could be demolished are affordable to moderate-wage workers." The EIS should include information about wages earned by employees in the Northgate area, particularly retail and service employees, who comprise 84 percent of the work force, and

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whether or not these employees could afford to live in the Northgate area. As the DEIS reports, even many moderate-wage workers find housing in Seattle too expensive. Their choice to live outside of Seattle creates regional impacts on land use, transportation, air quality, and climate. The DEIS reports that the redevelopment of current properties could result in displacement of some existing residents and a loss of rental housing as new units could be built as for-sale housing or would likely have higher rents. If the City's SEPA policies encourage preservation of housing opportunities, especially for low-income persons, then an argument could be made in favor of retaining the existing housing supply at the Northgate Apartments (207 units) and the Court at Northgate (130 units). As currently drafted, the proposed incentive zoning provisions may not require that the affordable housing be on the same site as the site where housing was demolished.

• The DEIS has several references to a number of issues involving the Court at Northgate property, which is currently developed to the full extent allowed under existing zoning. The issues include possible non-conformities relating to structure depth and width, parking quantity and location, building modulation, open space, impacts on the new park, setbacks, and emergency access and egress. The DEIS notes that as a general public policy principle, "non-conformities are undesirable and should be limited" and that the land use code "limits the ability of a property owner to expand or change a non-conforming use or structure." There are also peat soils on this property. The DEIS states that expansion of a nonconforming structure would require a discretionary land use decision based on the merits of the design. It also states that the emergency access and egress the Court at Northgate needs could be accomplished through an easement over park property. Creating a fire access easement to serve private property would be a significant adverse impact as it would interfere with and preclude another public use of the park and set an undesirable precedent. The Court at Northgate obviously has issues that will only be exacerbated by a rezone to either NC or MR and accordingly, it should be removed from further consideration for a rezone. The NACP considered this property's zoning and its place in the zoning hierarchy within the planning boundaries and transition zones. It is always possible that a property has already been developed to its highest and best use.

• The height, bulk and scale are critical issues to a sensitive transition between zones. We disagree with the DEIS conclusion that "minor" land use conflicts could result from larger buildings being located adjacent to less intensive development but that zoning transitions incorporated into the proposal would reduce the effect. By increasing the zoning to the next, more intensive zoning classification, the transition zones are moved to the edges between the Urban Center boundary and the single-family zones. In some cases, the difference could be 50 feet of additional height and fewer development standards; i.e. no density limits, no maximum lot coverage limits, and no front, rear or side setback requirements. The less intensive zone's access to light and air and privacy will be compromised. The DEIS states that "the difference between allowable heights is 30 feet and structures in the MR zone could cast shadows on the SF-7200 parcel for the majority of daytime hours." These are major impacts to livability. The DEIS suggests that there is potential mitigation of these long term impacts through the SEPA and design review process that could include provisions of additional setbacks, limiting heights of part of buildings, or using materials and landscaping to soften abrupt transitions in character of developments. We do not think it is

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- 7-16 reasonable to assume that either SEPA or design review has the ability to require additional setbacks or limit heights to effect satisfactory transitions after the fact. In our experience, most property owners already have a development plan and economics in mind for a project allowed under the zoning before they enter the design review and MUP processes. They simply reject any suggestion that would reduce the scope of their project as not being financially feasible, and DPD has a history, certainly local to our area if not citywide, of not working with communities to persuade developers to make these beneficial alterations.
- 7-17 • Even though single-family rezones are not part of this initiative, it won't be long before the City seeks to change the single-family rezone criteria. If higher intensity zones have been made as a result of this rezone proposal, the next argument made will be that a transition is needed between the higher intensity zones and the adjacent single-family. The transition will undoubtedly need to come from the single-family side and this would be inconsistent with the NACP and the City's Comp Plan.
- 7-18 • The EIS should include information about the Seattle Planning Commission's Affordable Housing Action Agenda and an analysis of how these strategies, if adopted, will influence the amount and location of the City's housing supply. If the City required minimum density zoning on commercial properties to require mixed uses, all the underdeveloped properties at Northgate would contribute to the housing supply in the way anticipated by the NACP, not just the self-selected "opportunity" properties.
- 7-19 • Larger scale buildings will cause shadows on the Urban Center Park currently under development. Combined with the Northgate North parking garage on the south side, this park will be the darkest, chilliest, most dismal park in Seattle.
- 7-20 • Parks within a 0.5-mile radius of the rezone study area include areas of both useable and unusable open space. The EIS should distinguish between those spaces, since not all of them function as traditional park space or are accessible for recreation. There is a fatal flaw in assuming that the amount of growth in the Northgate Planning Area will be the same under all alternatives proposed in the DEIS and that the additional need for park facilities is expected to be similar. The opportunities for acquiring new open space within the 0.5-mile radius are already limited. If greater than planned for growth occurs, park facilities will be inadequate and there will be no way to rectify the deficit. This would also be inconsistent with the NACP.
- 7-21 • The DEIS mentions the Northgate neighborhood-specific design guidelines and states that they will be taken into account during design and permitting, etc. The EIS should reveal DPD's recent initiative to review and update citywide design guidelines. Does DPD intend to standardize design guidelines and eliminate neighborhood specific guidelines? If so, this would be inconsistent with the NACP.
- 7-22 • The DEIS includes many references to the Northgate CTIP and its numerous planned improvements that are designed to support Northgate's planned growth but it does not reveal that the CTIP projects are not funded. There is no projected funding mechanism, in violation of state

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- 7-22 SEPA code and the Growth Management Act (GMA). The EIS should include a list of all CTIP projects, their costs, and clearly identify which projects have a dedicated source of funding, the source of funding and when the projects will be completed. This is important because the DEIS analysis assumes that CTIP-recommended improvements will keep pace with redevelopment and the commensurate addition of commercial space and housing. This is not a reasonable conclusion unless the CTIP is fully funded.
- 7-23 • The EIS should not assume that the Sound Transit light rail project would reach Northgate until voters actually approve funding for it. Furthermore, it should not be assumed that a second Northgate station is feasible until it has been studied, the costs determined and funding approved. The rezone study area is as far away as it is possible to get from the Northgate Transit Center and is beyond the 1/4 mile radius planners have assumed people will walk to access transit.
- 7-24 • We think it is a mistake and a potential fatal flaw for the DEIS traffic analysis to assume that an increase in residences or jobs in parcels along Northgate Way would result in a corresponding decrease in residences or jobs in one of more areas within the CTIP study area. If this were true, then the increased development at Northgate and the Northgate South Lot would tend to make this proposal completely unnecessary from a housing and commercial space demand point of view. If a property value increases to the extent that redevelopment is cost effective, the property will redevelop and the redevelopment will generate traffic. This erroneous DEIS assumption results in understating the traffic impacts of the rezones and in analyzing whether or not the impacts can be mitigated.
- 7-25 • We question the differing assumptions between the CTIP and the Rezone DEIS in evaluating traffic impacts. As noted above, it is a mistake to assume that the overall number of households and employment trips within the CTIP study area remains the same with the intensifying development proposed in the rezones. The EIS should report the differences between the modeling results for the CTIP baseline scenario and the Rezone DEIS no action alternative. The EIS should define and explain the City's "development capacity" methodology and its input to the transportation model. The EIS should also explain in detail why one year after the CTIP was completed; the City modified some of its assumptions to "better reflect the characteristics of development." The EIS should explain which model results for the DEIS are different than those in the CTIP and why they are different. We are shocked and amazed that the end result of these "modifications" is a conclusion that the rezones "would result in small changes in traffic volumes compared to the No Action alternative." This conclusion defies logic, given the dramatic increase in residential and commercial density implied in the proposals.
- 7-26
- 7-27 • Northgate Way functions as a system connecting Lake City Way and Aurora Avenue North. The DEIS assumes that the signals can be optimized to allow for the maximum flow of traffic at a set of intersections. The DEIS should include the LOS levels for each leg of each intersection in the system (i.e. from Lake City Way to Aurora Avenue N.) instead of averaging all legs.
- 7-28 • The DEIS reports that the traffic model "redistributes traffic to roadways that provide a faster travel path between a trip's origin and destination avoiding congested corridors" so that it appears that

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7-28 the rezone would result in small changes in traffic volumes. The DEIS should identify the each and every roadway to which traffic redistributes and the extent of the redistribution. The traffic impacts of the rezones should not be solved on the backs of the residential streets. This result would be contrary to the NACP.

7-29 • The DEIS states: "Although the City has not formally adopted a level of service standard for intersection operations city-wide SDOT and DPD seek to maintain LOS D and use this as a measure of impacts when reviewing proposed projects and requiring mitigation." At Northgate, however, the "CTIP applied the LOS E benchmark as a way to balance the needs of different transportation modes with levels of funding that were considered achievable." What is the justification for a different standard for Northgate? The City is fudging on meeting the concurrency requirements of the Growth Management Act and is allowing traffic conditions to degrade more at Northgate than elsewhere in the City. There is no doubt that the intersections of Northgate Way with 1st Avenue NE, 3rd Avenue NE, 5th Avenue NE, 8th Avenue NE and Roosevelt Way NE will be negatively impacted and that the 3rd and 5th intersections are already close to failure. Mitigation options are limited. Measures to improve traffic flow tend to decrease pedestrian movements. As the DEIS reports, Northgate Way is the only E-W arterial for a mile in both directions and it carries significant through traffic volumes. Instead of proposing upzones, the City should be taking steps to suspend development at Northgate until traffic impacts can be fully mitigated. SEPA-required mitigation related to the recent Northgate projects was very limited. There was no SEPA-required traffic mitigation for the Northgate Mall expansion of 116,750 square feet of retail and a 183,744 square foot parking structure. The Thornton Place project of 388 residential units, 144 senior housing units and 124,870 square feet of commercial uses was required to contribute a proportional share of the cost of installing a traffic signal at 3rd Avenue NE and NE 103rd Street. The Wallace project (161 residential units and 50,000+ square feet of retail was required to contribute a proportional share to improvements at 5th Avenue NE and Northgate Way. All this considered, it is not reasonable to conclude that new development will contribute any significant funding to transportation improvements at Northgate. The public is going to be funding the improvements and we think they are entitled to know what they are going to cost.

7-31 • Neither the Growth Management Act (GMA) nor SEPA include provisions that allow municipalities governed by the GMA to abandon required concurrency simply because an intersection is graded at LOS 'F'. While it may be common practice to do so today, this is illegal under the GMA and SEPA rules. The fact Seattle has not obeyed rules requiring concurrent traffic mitigations in the past, allowing intersections to degrade to LOS 'F', cannot be used as an excuse to not require traffic mitigation for future projects.

7-32 • It is an error to state that the previous EIS prepared for the NACP is still valid and did not identify deficiencies in infrastructure or service capacity within the Urban Center. Many of the assumptions used in preparing the NACP EIS are not longer valid because the City has not followed the provisions of the NACP. For example, the NACP assumed that turning movements along the Northgate Way corridor would be limited in order to make the street function as efficiently as possible. Despite this, the City approved of the very awkward intersection at 3rd

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7-32 Avenue NE to facilitate the Northgate North development; it approved of curb cuts to access Northgate Way for the Men's Wearhouse and Walgreens.

7-33 • The DEIS reports that the public benefit program is in an early stage of development and may change as it goes through public discussion and the legislative process. We would like to see more balance included between incentives and public benefits. There should be some sticks to balance out the carrots, especially since the public has funded so many of the improvements made in the Northgate area and will be likely to be stuck with funding all the transportation improvements or unlivable conditions due to unmitigated traffic impacts. That said, it is illegal under SEPA rules to consider these beneficial aspects of the proposal as a balance against the negative aspects identified in the DEIS and in this document.

7-34 • The upzone is premature given rapidly changing world energy requirements. In a few short years solar or other renewable energy technologies may dramatically change building design and energy infrastructure, impacting zoning requirements. The city should take time to contemplate ways to require or include incentives for new energy options.

7-35 • The King County Buildable Lands report notes that Seattle has three times the residential zoning capacity necessary to meet 2024 population growth estimates. The same report states that Seattle has 2.5 times the commercial zoning capacity to meet 2024 projected employment growth estimates. This upzone is, therefore, completely unnecessary to meet 2024 growth goals in housing or employment for the city of Seattle. No changes to the current zoning should be made.

7-36 • The DEIS does not consider cumulative impacts of development that feed into the traffic areas. Considerable new development is taking place in surrounding neighborhoods that will feed vehicle traffic into this area. The expansion of North Seattle Community College, the development at Waldo Hospital, the 145-unit proposed building at NE 85th and 20th NE, upgrades in sizes of local school facilities, the very large multi-use building planned for the old Chevrolet store, etc. are not adequately considered in the DEIS.

7-37 In conclusion, the DEIS states that "substantial redevelopment of the Northgate Urban Center Rezone study area could occur under the No Action Alternative." This is the alternative that should be adopted because it has the least environmental impact of the alternate proposals. The City does not need this new residential or commercial zoning capacity at least through 2024 and for the foreseeable future after that. It has failed to keep its commitments to concurrency as required by SEPA and the GMA in previous developments in the area.

Sincerely,



David Miller
President
Maple Leaf Community Council

Letter 7: Maple Leaf Community Council, David Miller

1. Your statement about the lack of need for rezones is noted. The legislative rezone alternatives (Alternatives 1 and 2) are not premised on a “need” for additional capacity in Northgate. They are, rather, an attempt to shape and focus growth in the Northgate Urban Center and to encourage more housing. The EIS notes that the housing market within the Northgate Urban Center is still relatively immature. Final EIS Alternative 3 assumes that individual contract rezones, rather than legislative action, would be the preferred method for changing zoning in Northgate.
2. As noted in the previous response, a purpose of the Northgate rezone alternatives is to help focus growth within the Urban Center and to encourage more housing. Note that the rezone proposal in part grew out of the Northgate Stakeholder process.
3. As a general principle, the Seattle Comprehensive Plan provides a policy guide for the type and density of land use, while zoning regulations implement these policies and establish specific density limits. The Comprehensive Plan does not, however, establish numerical density limits; such limits are established by zoning. For example, Comprehensive Plan Policies LU116, LU117 and LU118 seek to focus development at higher densities in Urban Villages and to achieve compatibility with adjacent land uses, but do not specify what specific zones should be applied. The EIS land use discussion evaluates whether proposed rezone alternatives would be compatible with adjacent zones and uses.
4. The preliminary reports from Mirai and Heartland are cited and summarized in the EIS and are available from DPD. The Mirai analysis was an attempt to generally identify any tipping point of additional development in the Urban Center which would compromise the transportation system and planned improvements. Its growth assumptions were similar to Alternative 1. The Heartland study was used as background information to help consultants and staff to understand real estate trends and market conditions in Northgate.
5. Your comment disagreeing with the Draft EIS’s interpretations of the causes for lack of development in the 1990s is noted.
6. Property values and similar issues are not elements of the environment and not required to be addressed in an EIS; please refer to WAC 197-11-448/450).
7. One of the express purposes of the Draft EIS was to explore potential impacts that would be associated with upzones on some residential properties adjacent to the core and different transitions between zones. Final EIS Alternative 3 retains the zoning of almost all residential properties adjacent to the core and east of Roosevelt Way; please see Figure 2-6 in this FEIS.
8. Your characterization of the Northgate Stakeholders Group as the “sole mechanism for ‘meaningful community involvement’” is not accurate. Additional forms of public outreach – including charrettes and community-wide workshops – have been used throughout the process to gain community input. Detailed information about the Stakeholders is available from DPD; it is not necessary to include this information in the EIS. Although staff did keep them informed about the EIS, the Northgate Stakeholder Group was not tasked with guiding or monitoring the development of the Draft EIS. Your further comments about methods of community involvement are noted.

Note that Final EIS Alternative 3 was developed in response to comments on the Draft EIS and concepts discussed at a community-wide workshop in November 2008; originally, the concept for upzoning in Northgate came from a community charrette in 2006.

9. Your comment is noted.

10. Your comments regarding the Northgate Mall property are noted. The study area for this EIS was limited to a portion of the Urban Center; it generally focused on near-term opportunity sites previously identified through community charrettes and other analysis.

11. All proposed, pipeline and planned projects in Northgate, including phased development of the King County TOD, were included in the analysis. Growth assumptions are identified in the CTIP (Table 4-2) and Draft EIS (Section 2.5.2.3).

12. Your comments about possible future development outcomes are noted. Note that Final EIS Alternative 3 would rely on individual contract rezones, which would provide greater control of future uses. The incentive zoning program is a separate regulatory program that was adopted by the City in December 2008.

13. This comment identifies differences in rental data cited in the DEIS versus Seattle Planning Commission information. Data in the EIS is specific to Northgate and North-Seattle, while the Planning Commission data is city-wide. No error in the DEIS information is substantiated by this comment. Additional information about wages of retail and service employees and their future capability to live in the Northgate area relates to analysis that would be speculative and beyond the scope of this EIS; please refer to the response to Comment 6 above.

14. Neither the City SEPA policies referenced in your comment, nor other adopted zoning regulations authorize the City to prohibit conversion of the existing residential buildings. The incentive zoning program is a separate and independent regulation that applies city-wide.

15. Your comments about the Court at Northgate property's nonconforming uses, peat soils and emergency access needs are noted. The lead agency does not agree with the conclusions reached by this comment.

16. The disagreement with the Draft EIS conclusions is noted; the City believes that the characterization of impacts is accurate. Shadow impacts are identified in the Draft EIS and the discussion has been supplemented in the Final EIS for Alternative 3 (refer to FEIS Chapter 3). SEPA and design review are commonly used tools to address potential land use impacts; your opinion that these would be ineffective is noted. Note that Final EIS Alternative 3 excludes almost all residential properties on the boundary of the study area to achieve more gradual transitions between multi-family and single family zones.

17. Your comments speculating about future single family rezoning actions are noted, but the lead agency disagrees with the content and conclusions.

18. The Seattle Planning Commission’s Affordable Housing Action Agenda is acknowledged as a progressive document that includes numerous strategies that could advance the ability to achieve affordable housing and increase housing supply. Minimum density zoning is one of the concepts recommended for further action by the Action Agenda. Such a strategy would create additional potential for future housing growth, but would be dependant on future development projects.
19. The Draft EIS analysis suggests there is only minor potential for additional shadowing of the new park from taller buildings as a result of the rezone alternatives (also refer to analysis in FEIS Chapter 3). Such additional shadowing could be analyzed further in future project-specific environmental reviews. Shadows are cast in a northwesterly direction during morning hours and a northeasterly direction in evening hours, with angles of shadows changing through the day and lengths of shadows varying through the year – longer in winter and shorter in summer. Uncertain locations and shapes of future taller building increase the difficulty in predicting shadow impacts, but a review of the property and street patterns suggests that future taller development associated with the rezone alternatives could incrementally add to shadows in the northeast corner portion the western portion of the park. If development occurred on the property north of the Men’s Warehouse on 5th Avenue NE, shadows in morning hours could be cast toward the northeast corner of the park. If development occurred in the southeast portion of Subarea B near 3rd Avenue NE, shadows in evening hours could be cast toward the southwestern quadrant of the park.
20. Your comments about the amount of unusable open space in existing parks, about assumed future growth amounts in the planning area, and limited opportunities for acquiring new open space leading to inadequate park facilities are noted. The lead agency reviewed the content of the Recreation analysis in the Northgate Neighborhood Plan EIS and concluded that it is an accurate statement of existing and likely future conditions. The assumption that growth would be the same for all alternatives but would occur in different forms and locations is explained in the Draft EIS. However, the DEIS also identifies impacts that could occur if higher than anticipated levels of growth occurred. Please refer to the shadow analysis of Alternative 3 in Chapter 3 of this Final EIS.
21. The City is reviewing and updating adopted city-wide design guidelines, but that project would not affect adopted neighborhood-specific design guidelines. Note that the proposal under any alternative includes updates to the Northgate District Design Guidelines to address pedestrian connections, open space and bicycle infrastructure, incorporate transit friendly design features and green features; and create design guidelines for development at the “edge” of the new park.
22. The comment primarily addresses how transportation projects in the City are funded; this is not an impact of the rezone alternatives and is not an issue that was discussed in the Draft EIS. The CTIP EIS and the Northgate Urban Center Rezone Draft EIS generally describe how projects will be funded, which includes a variety of revenue sources over time. It is not required, and not possible, to specifically identify all of those sources today. The City’s six-year capital improvement program (CIP) is the tool used to specifically identify funding; this approach is consistent with state law. The City monitors growth and the timing of planned improvement projects needed to support growth. If traffic improvements could not keep pace with growth, the City could respond by denying development projects or revising land use, as required by the Growth Management Act. Note that Final EIS Alternative 3, which encourages upzones through developer initiated contract

rezones, would also allow the City to plan and coordinate infrastructure improvements with project specific actions over time.

23. The region's voters approved extension of light rail in November, 2008. It is reasonable to assume, therefore, that light rail will reach Northgate; Sound Transit's planning will confirm the date that service is expected to start. The designated Urban Center provides excellent access to bus transit today and will provide access to bus and rail transit in the future. The one-quarter mile distance mentioned in the comment is a general number used to plan mixed-use development near transit stations. A 1999 report published by the Puget Sound Regional Council (PSRC), titled *Creating Transit Station Communities*, recommends a distance of between one-quarter mile and one-half mile (see <http://www.psrc.org/projects/tod/compact.htm>). According to the PSRC report, walking distances are variable and are influenced by (1) whether the walkway system is direct and complete and the walk environment is enjoyable and safe; (2) the level of transit service, i.e., people will walk further to a light rail facility; and (3) people will tend to walk farther between a station and residential or employment than they will to retail establishments.

24. Whether rezoning is "necessary" or not is a matter of opinion. The objectives of the rezone alternatives are described in Section 2.5.1 of the Draft EIS. The purpose of the EIS is to evaluate what could occur if the study area is rezoned based on the alternatives, not to prove or disprove a need for rezoning. The rezoning could occur as a result of legislative action (Alternatives 1 and 2) or through individual contract rezones (FEIS Alternative 3).

It is agreed that property values and demand are important determinants of the type, timing and location of redevelopment. The rezone alternatives examine those properties considered most likely to develop based on the value of the property and its improvements. The Draft EIS also acknowledges that residential demand in Northgate is still being tested. The rezone alternatives assume that the overall amount of growth in Northgate will occur as projected but that the location and form of this growth can be influenced by policy actions (i.e., rezoning); the traffic analysis is consistent with these assumptions.

Please also refer to the response to Comment No.1 of this letter.

25. Please refer to the previous response and the response to Letter No. 4, Comment 2. Appendix A of the Draft EIS describes the methodology used to calculate development capacity; the sentence describing the City's modification of its methodology is self-explanatory. The City monitors development on the ground to check the assumptions used to estimate development capacity. Assumptions are revised when appropriate. The Draft EIS attempts to present the traffic modeling assumptions and results as clearly and concisely as possible; including comparisons to CTIP model runs would complicate this presentation. Note that Table 4-7 in the Draft EIS does compare the CTIP baseline level of service to the Rezone EIS No Action Alternative.

26. Your comment is noted.

27. The City's LOS methodology looks at the average for all turning movements. Signals along Northgate Way can be optimized. Note that Lake City Way and Aurora Ave. North are not included in the Northgate study area. The LOS data analysis sheets showing turning movements for

each intersection leg are voluminous and were not included in the document for this reason. This information is on file with DPD.

28. The assumption about cut-through traffic is commonly used in traffic modeling and reflects observations about driver behavior when there is traffic congestion.

29. Please refer to the Northgate CTIP, which describes the Level of Service (LOS) benchmark and includes an estimate of improvement costs. The Draft EIS accurately describes the City's level of service standards and its approach to monitoring and enforcing concurrency on a city-wide basis; concurrency applies to Northgate as it does to all neighborhoods. Concurrency is an adopted program and it is not an "action" that is being proposed or modified; it is not required to be evaluated in the this EIS. Similarly, the CTIP is an existing program that was evaluated in a prior EIS; it is not the subject of the this EIS.

30. Your comments regarding SEPA mitigation for recent projects in Northgate are noted. Please see Draft EIS Tables 4-7, 4-9, 4-10 and 4-12, which identify projected (2030) levels of service at the intersections mentioned in your comment. Please refer to the Northgate CTIP, which includes an estimate of improvement costs.

31. The Growth Management Act does not specify any minimum or maximum level of service for intersections; Cities may establish any level they consider acceptable. Concurrency is not being modified in Northgate; section 4.5.5 describes how concurrency is applied city-wide. Please see the response to Comment No. 29 above.

32. In view of the very slow growth that occurred in Northgate through the 1990s and early 2000s, the information in the EIS for the Northgate Area plan is still considered to be accurate. The scope of the this EIS addresses those elements of the environment for which updated information and analysis is relevant. The City's prior actions regarding intersection improvements are not the subject of this EIS.

33. Your comments are noted. The public benefit program, which was adopted by the City Council in December 2008, is focused on providing affordable housing. It is an adopted city-wide development regulation and does not require further evaluation in this EIS. Final EIS Alternative 3, described in Chapter 2 of the Final EIS, includes a proposal to develop incentive zoning provisions specific to Northgate. Bonus provisions in addition to affordable housing could include pedestrian connections, streetscape improvements, open space and sustainability features.

The Draft EIS does not balance the positive and negative aspects of the rezone alternatives, which would be counter to the requirements of WAC 197-11-330 (5). Rather, it acknowledges the existence of adopted city regulations that would mitigate identified impacts; this is an appropriate consideration per WAC 197-11-660 (1)(E), and SMC 25.05.665 (B). Numerous comments on the Draft EIS, in fact, noted that the EIS does not include many positive effects of rezoning; see for example, Letter No. 9 Comment No. 3 below.

34. Your comments suggesting the rezones should wait until future energy technology and related building design implications are better understood are noted.

35. Your comments with respect to Seattle's citywide development capacity and your conclusion about the lack of need for a rezone in Northgate are noted. Please see the responses to Comments No. 1 and No. 24 above.

36. The City of Seattle transportation model that was used for the traffic impact analysis does include background growth outside Northgate that would generate traffic within and through Northgate; cumulative impacts are therefore addressed. Please refer to Section 2.5.2.3 of the Draft EIS, and to the CTIP Draft EIS for identification of assumed levels of growth and projects included in the traffic model. Please refer to Letter No. 3, Comment No. 6 regarding North Seattle Community College.

37. Your preference for the No Action Alternative is noted. Alternatives in a SEPA document are intended to provide comparisons of the environmental impacts of different courses of action. However, SEPA does not require that an agency adopt the alternative with the lowest or lower relative impacts. However, Final EIS Alternative 3 has been developed in response to the impacts disclosed in the Draft EIS, and would address many of those adverse impacts. For example, it would modify the boundaries of the rezone area to exclude almost all of the adjacent residentially zoned properties and create better transitions between uses; and other actions are proposed to incorporate changes to design guidelines and provision of incentives to address Northgate-specific issues.

June 5, 2008



Ms. Diane Sugimura, Director
Department of Planning & Development
City of Seattle
700 Fifth Avenue
Suite 2000
Seattle, WA 98124-4019

Re: Northgate Area Rezone Proposal

Dear Director Sugimura: *Diane*

On behalf of the more than 4,500 members of the Master Builders Association of King and Snohomish Counties (MBA), I am writing in support of Alternative #1 – Broad Rezone of the Northgate Urban Center to encourage the broadest range of development alternatives within the Environmental Impact Statement (EIS) currently under consideration.

8-1

According to Seattle's own Northgate documentation, "over the next 20 years, the city of Seattle is expected to grow by more than 51,000 households and 92,000 jobs." Northgate, along with the five other Urban Centers, will be critical in providing the necessary housing to accommodate Seattle's new residents.

Having reviewed the recently released Northgate draft EIS and its proposed alternatives, the only logical choice in the face of this expected growth is Alternative #1 – Broad Rezone of the Urban Center, allowing more intense zoning classifications. In addition, the MBA supports land use Scenario A, or a 75% residential to 25% commercial focus for mixed-use development.

8-2

One other concern of the MBA within the EIS is the Proposed Incentive Zoning Ordinance and its correlation to rezones in the Northgate Urban Center. According to Heartland in a study commissioned by the city, "at this stage of redevelopment, there is reason to doubt that potential developers would participate in the incentive zoning program given the economics of the residential market." This statement was written prior to the current downturn in the housing market. Northgate's economics don't translate well with Seattle's proposed Incentive Zoning program and should be stricken from the EIS.

Thank you for the opportunity to comment. Please contact South King County Manager Garrett Huffman with any questions or concerns you may have at 206-605-8877, or ghuffman@mbaks.com.

Very Truly Yours,)

Samuel L. Anderson
Samuel L. Anderson
Executive Officer

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Letter 8: Master Builders Association

1. Your comments supporting Alternative 1A – Broad Rezone with a Residential Focus are noted.
2. Your comments in opposition to incentive zoning are noted. Please refer to the response to Letter No. 6 Comment No. 3.



Seattle Great City Initiative Comments to Northgate EIS 6/16/2008

The Seattle Great City Initiative appreciates the opportunity to present comments on the Draft Environmental Impact Statement for Northgate.

We support the city's efforts to provide jobs and housing in the Northgate Urban Center as part of a comprehensive strategy to improve neighborhood vitality in Northgate. Furthermore, new housing and jobs in Northgate are consistent with our region's pressing environmental, economic and social objectives.

With rising energy prices, and the need to confront the worst effects of sprawl and global warming, it has never been more critical to provide communities that meet the following criteria:

- **Complete:** A vibrant mix of people, grocery stores, green infrastructure, civic and cultural anchors, employment centers, retail establishments, and housing
- **Compact:** New development that is designed to make efficient public infrastructure investments with pedestrian-oriented neighborhoods that are efficient, walkable and affordable
- **Connected:** People living near transit connections and walking and biking safely to daily destinations

Recent analyses demonstrate that such communities significantly reduce families' housing and transportation costs, support local businesses, encourage walking, biking and transit, enhance human health, and reduce the cost of providing government services. Just as important, Great City recognizes that creating these types of communities dramatically reduces greenhouse gas emissions, air and water pollution, resource consumption and destructive suburban and exurban sprawl.

For these reasons, we encourage the efforts of the city to rezone and revitalize the Northgate Urban Center in order to meet the targets of the city and the Puget Sound Regional Council.

In some respects, Northgate is well on the way to becoming an extraordinary neighborhood. The new community center, park and library, as well as improvements to 5th Avenue were important civic investments. New development and the Thornton Creek Water Quality Channel in Northgate's former

9-1

9-1 south parking lot will bring new residents and publicly accessible open space and improved function to one of Seattle's salmon-bearing streams. The community is well served by transit with the existing Transit Center, and the likely extension of light rail to Northgate will give it access to other regional destinations.

9-2 In other ways there remains much to be improved. The streetscape in many areas is unpleasant or hostile to walking and biking. Traffic to, from and across I-5 clogs the neighborhood, and Northgate Way often proves to be a hindrance to pedestrian connectivity. In addition, the current design of Northgate Mall is antithetical to a walkable mixed-use community. Many areas are underdeveloped, with single-use retail surrounded by parking lots. Changes to the zoning code can help spur new housing, jobs and a better community, but such changes standing alone are likely to be insufficient.

Indeed an analysis of Northgate done for the city by Heartland concluded that rezoning by itself was not likely to spur redevelopment. Heartland concluded that an upgrading of pedestrian amenities and green infrastructure will be required to attract private capital for redevelopment. Heartland further concluded that given the market conditions, there might not be sufficient value in rezones to generate public benefits paid for by new development. (In this regard, we believe new housing is itself a significant public benefit.)

This background information leads us to make the following comments to the Draft EIS:

Positive Environmental Effects

9-3 We believe it is appropriate for an EIS to address not merely negative effects of governmental action, but also the positive environmental effects. For example, it is well documented that residents of neighborhoods with a diverse mix of uses that are well served by transit have dramatically lower emissions of global warming pollution than residents of sprawling auto-dependent communities. To put it another way, the "no action" alternative carries with it adverse environmental impacts. The failure to encourage growth in well-designed urban centers means it is likely we will see more sprawl, more pollution, and increased greenhouse gas emissions. Incorporating this analysis into the Draft EIS would provide useful information to elected leaders and the public as they consider the zoning and land use changes contemplated in Northgate.

Height, Housing, and Affordability

9-4 We support consideration of greater heights than was contemplated in the EIS. While we are not advocating for any particular option at this time, we believe that consideration of a wide range of alternatives will provide for a richer discussion. Additional height can make more housing available in Northgate, and potentially make it possible for private investment in affordable housing, local amenities (parks, streetscapes, plazas, community facilities), and regional objectives (transfers of rural development rights). One option is to maximize availability of NC 85 zoning, which allows for affordable wood-frame construction over a concrete base. In addition, given Northgate's location and designation as an Urban Center, it is reasonable to consider focused investments in "point towers" as an option. This building type, characterized by a tall slender tower, a pedestrian friendly base, and publicly accessible open space, has proven very successful in Portland and Vancouver. Whether point tower or 85 foot zoning, we recommend that the additional height be accompanied by a footprint limitation that would promote wider sidewalks or plazas.

9-5 Increasing housing supply is itself a key strategy to maintaining housing affordability. As was noted in the Heartland analysis, it is likely that most market-rate development would be affordable to those making between 80% to 130% of median income. Given this finding, the city should maximize opportunities for construction of such critically needed housing. Maximizing the build-out capacity of Urban Villages also acts as a housing "release valve" for the city by increasing housing supply thereby increasing affordability.

9-6 Additionally, locating housing near transit is also a key strategy to affordability. Transportation is the second largest household expense after housing, with the average American family spending 20% of their income on transportation. By contrast, households in transit-rich areas spend only 6% of their income on transportation. Given the significant relationship between housing location and transportation costs, the city should not measure housing affordability in Northgate based solely on housing costs. In determining whether affordability criteria are met, the city should consider whether combined housing and transportation costs are affordable at different income levels. The methodology for determining such costs can be found at the Center for Neighborhood Technology (http://hta.index.cnt.org/map_tool?region=Seattle--Tacoma--Bremerton,%20WA)

Transportation

9-7 The EIS demonstrates a concern with maintaining acceptable levels of automobile movement. In an urbanizing area, it is unreasonable to let traffic considerations inhibit housing growth or the ability to walk or bike through the neighborhood. While the DEIS finds that the traffic impacts are acceptable, it nevertheless indicates that traffic impacts are a serious concern. The city should work to use roads efficiently, including throughput of traffic, but not at the expense of housing growth, walking, biking or transit. In this day and age, we believe it neither desirable nor feasible to limit the opportunity to provide housing in a transit-rich neighborhood in order to maintain high levels of service for single occupancy vehicles.

Parks, Streets, Plazas and Green Infrastructure

9-8 We appreciate the city's existing investment and pending investments in parks and streetscapes in Northgate. But it must be a priority to improve the walkability of current streets. Adding "green" through trees, planting strips, median plantings and pocket plazas can improve the walking experience, as well as contribute to the appeal of the business district. In addition, given that Northgate is located on the headwaters of Thornton Creek, there are rich opportunities to incorporate natural drainage into streets and new development in order to control stormwater quantities and reduce pollutant runoff. We recommend that planning for parks, transportation and sustainability objectives should be integrated into a single "green infrastructure" plan. For example, a street could incorporate intensive vegetation and natural drainage for the purpose of controlling stormwater, to create a street with park-like attributes, and to encourage walking. A green infrastructure plan for Northgate could identify opportunities to maximize investments from different city agencies, as well as leverage private investment, in ways that could enhance livability, and hence economic viability, and meet high sustainability objectives.

Scope

9-9 The city should consider rezoning for the area to the south of the proposed rezone to include Northgate Mall within its scope. As currently configured, Northgate Mall is one of the primary reasons

9-9 why the Northgate Urban Center is so auto-oriented. While the rezoning process alone cannot dictate housing stock, zoning is one of the most powerful tools that the city has at its disposal to increase housing stock within a given area. Additional housing stock around the Northgate Urban Center, coupled with predicted increases in both bus and rail transit will not only make continued increases in infrastructure for automobiles unnecessary, but it will also ensure a continuous customer base in an era of increased energy costs.

Conclusion

While the last decade has seen relatively few new housing units in Northgate, there has also been an increasing recognition of its potential as a great residential neighborhood. We appreciate this opportunity to provide comments on the proposed rezone, as one of the key elements to helping Northgate reach its potential.

Letter 9: Seattle Great City Initiative

1. Your comments supporting compact urban centers that are complete in their mix of uses and connected to nearby transit systems are noted.
2. Your comments are noted. Please refer to Final EIS Alternative 3, which would include design guidelines and bonus provisions that address issues relating to the pedestrian environment and sustainable development.
3. Your comments regarding the connection between land use patterns and greenhouse gas emissions are noted. Please see the response Letter No. 6 Comment No. 4. Your comment regarding the positive environmental impacts of development in Urban Centers is noted. An EIS only needs to analyze the probable adverse environmental impacts that are significant, but may also discuss beneficial environmental impacts (SMC 25.05.402). Some of the positive impacts mentioned in the comment are alluded to in various places in the Draft EIS (Section 2.1 and 4.1.2) but are not discussed in detail.
4. Your comments supporting consideration of higher height limits are noted. Alternative 3 in the Final EIS evaluates the impacts of allowing taller buildings at several locations within the Urban Center. Alternative 3 also includes bonus provisions that would encourage better pedestrian connections, streetscape amenities, sustainable building design and open space improvements as part of individual contract rezones.
5. Your comments supporting actions that will increase the overall supply of housing are noted. One of the objectives of this EIS is to explore alternatives for increasing housing within the Northgate Urban Center. The City's incentive zoning program was adopted in December, 2008 and is focused on increasing the production of affordable housing.
6. Your comments supporting housing development near transit services, and describing a broader perspective on "affordability" that considers both housing and transportation costs, are noted.
7. Your comments suggesting that maintaining levels of service on roads should not hinder opportunities for housing growth are noted. Please refer to the response to Letter No. 7, Comment No. 29.
8. Your support for investments to improve walkability of streets, add greenery to the streetscape, and incorporate natural drainage features and stormwater treatment features is noted. Your description of the benefits of a coordinated "green infrastructure plan" is also noted.
9. Your support for adding the Northgate Mall property and other southerly properties to the rezone area is noted.

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August 11, 2008

Kristian Kofoed
City of Seattle – DPD
PO Box 34019
700 Fifth Avenue, Suite 2000
Seattle, WA. 98124-4019

RE: Northgate Rezone Proposal

Dear Mr. Kofoed,

Thank you for this opportunity to offer input on the rezone. Following are some points that we hope you will consider as you undertake your admirable and much needed effort.

Enabling Mass Transit.

Success of light rail/bus transit is highly predicated on density of housing. Concentrated housing provides the tax base to build the systems, and to fund the daily fares for operational expenses. Concentrated housing is often a pedestrian based type of housing. People prefer to use mass transit, thereby funding it, if it is close by and enjoyable. Housing must be dense and close by or the mass transit will not be used.

Successful Models.

The successful mass transit models in the world (Most large Japanese cities, numerous Chinese and Indonesian, London, Paris, Moscow, Prague, NY, Chicago) have great density in the vicinity of the transit stops. It is poor governance for Seattle to attempt to promote an expensive mass transit system without ensuring its success. The models that work all have great density.

Environmental Collapse.

Global warming demands that we get people out of their cars. There are not enough natural resources on the planet to sustain the present rate of energy consumption that is occurring as all parts of the world become affluent.

Present Zoning.

Low density housing, limited to a few blocks in each direction from a transit stop, will not provide the critical mass of riders and taxes and daily fares to support mass transit. Present zoning, when built out, will only allow 1,000 to 2,000 new riders living at each stop. This is far short of what is needed. Mass transit success requires many times this. The zoning will have to be much denser and stretch much farther away.

Public Support.

People will readily accept denser zoning if it is well designed. It only takes 10 minutes to walk a half mile. Many people in the world willingly walk 10 minutes to get to work.

Quality Design.

Slender high-rise towers, fully served with elevators and on-site management, are very desirable places to live. Today many households have all members fully employed. They need low maintenance and well served buildings. Witness the successful buildings of this type that are rising all over central Seattle. Large buildings can provide the management, storage, security, economy of scale, etc that keeps them continually successful. Small buildings, such as the present zoning dictates, are very hard pressed to provide these features.

Design Parameters.

Zoning can be written so that the neighborhood feel is acceptable. There can be separation requirements in order to prevent too great a concentration of large buildings in one spot. Parking can be adequate and below grade. Streetscapes can be open and landscaped. Good view and light corridors can be dictated.

Existing Codes.

Present zoning leads to massive low-density buildings that produce a canyon feel, choking off light and openness. They cover too much of the lot with reflective, hard surface. This is environmentally unsound. A tower would allow half of each city block to remain usable green open space.

Feasibility.

It is only economically practical to build 6 story buildings or very tall buildings. This is largely driven by the safety aspects of the code. An 8 story building is many times more expensive than a 6 story building yet only 1/3 again larger. So it does not pencil out to finance and build an 8 story building. To be done intelligently, a building wants to be 20 plus stories tall and have a floor area to justify the elevators, HVAC, etc that serve each floor. At a bare minimum the floor should be 10,000SF. At 50% lot coverage this would only require a 20,000SF lot. A building site of this size is easy to assemble.

The west side of I-5, in the area defined by 100th on the south & 113th on the north and I-5 on the east & Meridian on the west, provides many acres of underdeveloped land poised to support and enable the redevelopment of Northgate you are working on. Included in this area is a block we own at 107th and Bagley. We strongly urge you to include our property in this rezone. Our property is within a five minute walk from what will be the new transit hub for Northgate. And we encourage you to re-write the code to allow well designed residential towers for the reasons stated above.

Very soon the growth of Seattle will ensure that all the present sites that can provide the vital density are gone. These sites are presently and continually being developed with low-rise buildings. These buildings will be so new and so expensive that they will not be torn down to enable the high density that mass transit requires. So the mass transit will not be economically

10-6 | viable and will not get built. As a consequence we will not make any meaningful improvement in the rapid pace of the environmental deterioration that we are experiencing.

Sincerely,



Greg Goodwin
Civetta Properties

Letter 10: Civetta Properties

1. Your comments describing the relationships between high development densities and mass transit systems' successful operation, and the need to limit energy consumption, are noted. An objective of the Urban Center Rezone Alternatives is to provide opportunities to increase densities within the Northgate Urban Center proximate to transit. Please also refer to the response to Letter No. 6, Comment No. 4.
2. Your comments supporting denser zoning, describing the need for well-designed residential towers and indicating other urban design considerations, are noted.
3. Your comment describing different building bulk implications of lower-density versus tower-shaped buildings are noted.
4. Your comments, describing financial feasibility considerations for building development, and supporting 20-story or taller buildings rather than 6-story buildings, are noted. Final EIS Alternative 3 could generally allow, subject to contract rezone approval, more buildings 85 feet, 125 feet and in one location, 160 feet in height.
5. Your comments supporting an increase in the rezone area west of I-5 between approximately N. 100th and 113th Streets are noted. Note that Final EIS Alternative 3 would increase the density achievable through contract rezones in this general area.
6. Your comments, indicating a scarcity of sites with dense growth capability, the continuing development of lowrise buildings, and lost opportunities to support mass transit and slow the pace of environmental deterioration, are noted.

Comment Letter No. 11

June 16, 2008

City of Seattle Department of Planning and Development
PO Box 34019
700 Fifth Avenue, Suite 2000
Seattle, WA 98124-4019
Attn: Kristian Kofoed

RECEIVED
JUN 18 2008

City of Seattle Department of Planning and Development
PO Box 34019
700 Fifth Avenue, Suite 2000
Seattle, WA 98124-4019
Attn: Kristian Kofoed

HB Northgate, LLC
600 University Street
Suite 2018
Seattle, WA 98101

RE: 835 NE Northgate Way, Seattle, WA – Northgate Rezone Draft EIS Public Comment

Dear Kristian,

I write this letter on behalf of HB Northgate the owner of 835 NE Northgate Way, Seattle, WA in regards to the Rezone Draft EIS published by the city of Seattle. HB Northgate fully supports the efforts of the city of Seattle and supports a legislative rezone of a portion of the Northgate Urban Center. We believe the City should do everything it can to increase density near future transit, increase land use in a centralized area while raising the tax base for the city of Seattle.

Currently, our zoning at 835 NE Northgate Way is NC2-40 on 44,500 Square Feet, and based on our analysis of potential future redevelopment a height cap of 85 feet to 125 feet would be a height that HB Northgate would fully utilize and develop in the next decade. We see a great amount of potential in the Northgate Neighborhood of the city and have always viewed the area as positioned for growth and urban density.

To reiterate, we encourage the proposed rezone and the Environmental Impact Statement to bring mixed use development to the area. In the next years HB Northgate would fully utilize additional height in the area and look forward to additional FAR in an area well positioned for future growth.

Sincerely,



Ed Hewson
Manager
HB Northgate, LLC



Jon Breiner
Manager
HB Northgate, LLC

11-1

Letter 11: HB Northgate LLC

1. Your support for height limits of 85 feet to 125 feet, and your support for increasing buildable densities near transit service, are noted.



May 26, 2008

Mr. Kristian Kofod
Senior Urban Planner
City of Seattle DPD
PO Box 34019
Seattle, WA 98104

RE: Northgate Urban Center Rezone Draft EIS

Dear Kristian,

12-1 In general, we believe that Draft EIS fails to adequately address the impacts of meeting the targets set by the City of Seattle for 2024 and positively doesn't address the new targets set by PSRC for 2040 for the region. In order for the Northgate rezone to be effective, meet the City of Seattle's and mayor's sustainability goals for the City of Seattle the zoning for the Northgate Urban Center should be increased to at least NC 3-125.

The following is our specific response to the Draft EIS for Northgate:

- 12-2 1) It is highly unlikely that the No Action Alternative will produce the number of housing units to meet the targets that the City has set for Northgate for 2024. The recent activity south of the Northgate Mall and at the Wallace property does not suggest that there will be enough housing built over the next 16 years to get to 2,500 units. As the Heartland study suggests, there is not sufficient existing zoning capacity to meet the existing comprehensive plan target by 2024.
- 12-3 2) There is no discussion in the Draft EIS of how the various proposed alternatives will meet the City of Seattle, King County or the State of Washington's goals for reducing green house gases and lowering CO2 levels in our city, region and state. We believe that the Final EIS should have significant discussion and analysis of these issues.
- 12-4 3) As discussed on pages 2-10 and 3-8 of the DEIS, there are many Super Blocks in the Northgate Urban Center. Specifically the super block formed by the area north of NE 112nd and between 1st Ave. NE and 5th Ave NE. We believe the EIS for Northgate should discuss the impacts of extending NE 112nd to the west of 3rd Ave. NE to 1st Ave. NE and the creation of a new street NE 113th between 1st Ave. NE and 5th Ave. NE. The breaking up of these super blocks would create a better pedestrian environment, would help reduce congestion on 3rd Ave. NE and traffic on NE Northgate Way. The EIS and CTIP need to address this issue in spite of the comment on page 1-14 that there were "right-of-way constraints".

Building Areas with Management

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- 12-5 4) The Draft EIS fails to discuss the difference in parking requirements for commercially zoned projects in Urban Centers. In December 2006, the City of Seattle approved revised commercial code language that eliminated parking requirements for housing in urban centers in the city. The final EIS should discuss the impacts of the reduced parking requirements on traffic, air quality, aesthetics, housing and other elements of the environment. It should also discuss the likely difference between zoning properties for commercial or multi-family based on parking.
- 12-6 5) The DEIS should discuss the improvement in water quality of drainage in the Northgate area when more properties are redeveloped to higher densities. The redevelopment will likely result in properties bringing their storm drainage facilities to current standards and therefore improve the water quality for fish and other aquatic animals. The No Action Alternative will continue the existing status quo, but the rezones would improve water quality.

Sincerely,

James B. Potter
Chairman
Kauri Investments, Ltd.

Building Areas with Management

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Letter 12: Kauri Investments, Ltd.

1. Your comment is noted. The 2024 targets from the Comprehensive Plan which are used in the EIS are still the “official” targets used for planning under the Growth Management Act (GMA). Section 4.2 of the Draft EIS discusses the relationship of the rezone alternatives to these adopted targets. Under the GMA, the state Office of Financial Management (OFM) develops forecasts of county-level population and these forecasts are the mandatory starting point for establishing city-level or smaller area population targets. Using a process established in the Countywide Planning Policies (CPPs), all jurisdictions in King County will then confer and agree on population and job targets which they will individually plan to accommodate in their respective Comprehensive Plans. The PSRC 2040 growth targets will provide additional guidance for the relative allocation of population and jobs throughout the region (i.e., among counties, to urban centers, etc.). However, the PSRC 2040 growth targets are not effective at this time and are not binding on the City. They are being used by PSRC to update *Vision 2040*, the regional growth strategy, and *Destination 2040*, the metropolitan transportation plan but they are not an official forecast for planning purposes. The City will update its Comprehensive Plan in 2011 to incorporate the new 2040 growth targets after they are incorporated in the CPPs and will then allocate this growth among city neighborhoods, including Urban Centers. Please refer to Table 2-3 in Chapter 2 of this Final EIS for a summary of the capacity for new residential and commercial growth that would be created by the rezone alternatives.

2. Your comments are noted. The Draft EIS concludes that with the exception of Alternative 1B (Broad Rezone, Commercial Focus) all alternatives considered in the EIS, including No Action, would provide sufficient development capacity in the Rezone Study Area to meet the entire 2024 housing targets (see Section 4.2.1) for the Northgate Urban Center. The Draft EIS acknowledges, as the Heartland study pointed out, that a strong residential market in Northgate is still emerging. Regarding jobs, Alternative 1B (Broad Rezone, Commercial Focus) would provide development capacity in the study area that exceeds the entire Urban Center’s job target. Alternatives 1A, 2, and 3 would not accommodate as much job growth within the study area, but would still provide more capacity than under the No Action Alternative. Note, however, that additional zoned growth capacity exists within the Northgate Urban Center and outside the Rezone Study Area.

3. Please refer to the response to Letter No. 6, Comment No. 4 regarding greenhouse gasses.

4. Your comments regarding the superblocks are noted. The Draft EIS alternatives did not specifically address the superblocks or increasing pedestrian connections. However, actions applicable to any alternative in this Final EIS propose guidelines, standards and incentives for creating mid-block pedestrian mews or promenades. The alternatives do not propose extending any streets to accommodate vehicular traffic.

5. An analysis of impacts of the reduced parking requirements was done in 2006, at the time the changes were proposed. Since these requirements are already part of the assumed existing condition, there would be no “difference” in presumed impacts to identify. It is acknowledged that the Land Use Code contains different parking standards for commercial and multi-family uses; the lead agency does not identify this as a substantive adverse impact concern.

6. Please refer to all of the responses to comments in Letter 1 for further discussion of water quality.

MULLALLY DEVELOPMENT COMPANY

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Comment Letter No. 13

June 16, 2008

Mr. Kristian Kofoed
Department of Planning and Development
P.O. Box 34019
Seattle, WA 98124-4019

Via Email

Re: *Northgate Urban Center Rezone - Comments on Draft Environmental Impact Statement (EIS)*

Dear Mr. Kofoed:

We are the owners of the nearly eight-acre site known as the Northgate Apartments, just north of the Mall and east of I-5. The Draft EIS calls our property "an 'opportunity site' because of its redevelopment potential, large size, and location near the future park." Draft EIS, p. 3-4. The Northgate Apartments property does indeed have a unique position at Northgate. It represents a very significant opportunity for the City to meet its long-held - but not yet realized - planning goals for Northgate.

In fact, Northgate Apartments, along with the Wallace and Court at Northgate properties, are the three major parcels likely to be redeveloped in the next 10 to 20 years. Thus, the type of development allowed on these parcels will largely determine whether regional and City goals for the Northgate Urban Center are met. We encourage the City to keep this in mind as it develops the final rezone proposal and seeks to apply incentive zoning concepts to Northgate. The interplay between the rezone and incentive zoning requirements will significantly affect the practical ability and likelihood of achieving those long held and currently unrealized goals of increasing housing and jobs.

As active participants in Northgate planning for many years, we are pleased that the City is proceeding with its legislative rezone. We strongly support the concept of Alternative 1, with two important caveats. First, the Alternative 1 - Broad Rezone proposal would split our property into markedly different zones (Neighborhood Commercial and Midrise). This would reduce its redevelopment potential, as emphasized in our comments below. We urge DPD to add a variation of Alternative 1 to the Final EIS that applies a Neighborhood Commercial designation to the entire Northgate Apartments site, and adjacent parcel owned by the Spearbecks.

Secondly, we request that this revised alternative apply a 125-foot height limit to the entirety of the Northgate Apartments site and adjacent parcel owned by the Spearbecks. A 125-foot height limit would provide greater design flexibility for a potential tower location. Making these two revisions to Alternative 1, so that the entire site is zoned Neighborhood Commercial 3-125, will make this important property a true opportunity to realize the City's planning goals.

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Offered below are our specific comments on the Draft EIS.

Comment Letter No. 13

Land Use and Aesthetics

a. Comments on Split Zoning of Our Property

Alternative 1 proposes that the eastern half of our property be separated into two different zones: Midrise on the north, and Neighborhood Commercial on the south. The City's own rezone criteria suggest that split-zoning of a parcel should be avoided (see Zoning Principles in SMC 23.34.008.E.3). There are many good reasons not to divide a single parcel into multiple zones. For example, there are conflicts and inconsistencies between the two zones, such as setbacks required in the Midrise zone but not the Neighborhood Commercial zone, that compromise a cohesive development. (This problem will likely exist, even if the changes are made to the Midrise zoning through the upcoming revision to the Multifamily Code.) We believe that split zoning of the eastern half of the property will substantially reduce its redevelopment potential, thus undermining the goals of the rezone.

Moreover, there appears to be no valid reason to establish Midrise zoning on the northeastern quarter of the Northgate Apartments property. Although the proposal may include Midrise zoning on this part of the property out of a potential concern for the effect of commercial uses opposite the City park, we note that that Neighborhood Commercial zoning is proposed for the Court at Northgate Apartments property directly north of the City park. Thus, Neighborhood Commercial zoning is not unacceptable next to the Park. Retail uses can certainly be complementary to public use of the Park. Also, at this location, Neighborhood Commercial zoning is likely to result in a residential or mixed use building.

In addition, design issues relative to the Park can and will be addressed through application of the Northgate Overlay zoning and the design and modulation requirements that accompany that zoning height, and through the Design Review process. We thus urge the City to add a variation on Alternative 1 to the Final EIS that replaces the proposed Midrise zone with a Neighborhood Commercial 3 zone.

We also note that Midrise zoning should not be imposed as some sort of "trade off" to the 125-foot height limit to be allowed on the Northgate Apartments property. Development beyond 85 feet may or may not be possible; development at that height limit is a completely different construction type, and it is not yet known if development to 125 feet will occur. Thus, the Midrise quarter of the property should not be penalized because development could be at 125 feet on the site. It is important that this key "opportunity site" have a uniform Neighborhood Commercial 3 zone designation, to act as an impetus to redevelopment, so that the City can meet its planning goals.

b. Comments on 125-Foot Height Limit

The Northgate Apartments site is recognized as an important gateway to the Northgate Urban Center. With its location next to the freeway and opposite the mall, it has a prominent visual location that will help to define the urban design of the Center. The Alternative 1 in the Draft EIS proposed a 125-foot height limit for the western half of the property, and 85 feet for the eastern half. We instead ask you to include a revised alternative that allows a 125-foot height for the entire Northgate Apartments site, and the adjacent parcel owned by the Spearbecks.

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13-3 Revising the height limit in this manner will provide needed design flexibility for determining the appropriate location for a possible tower, while recognizing that building bulk is controlled by the allowable Floor Area Ratio. Providing a flexible design and development envelope with adequate height to respond to market variations over time is the most effective means to foster redevelopment in the Northgate study area and specifically for "opportunity sites" like the Northgate Apartments.

c. General Comments on Land Use and Aesthetics

13-4 In the discussion of existing zoning under both the Land Use and Aesthetics sections of the Draft EIS, the Neighborhood Commercial zones are described as having "No limit on density." P. 3-3; see also p. 4-26. This is misleading, as the Floor Area Ratio limit for the Neighborhood Commercial zones was explicitly adopted in 2006 as the means of density control in the Commercial zones, to replace the prior methodology for limiting the number of units. There is a density limit in the Neighborhood Commercial zones, and this should be corrected in the Final EIS.

13-5 Notably absent from the Draft EIS are the specific zoning standards from the Northgate Overlay. Those serve to modify the base zoning requirements in a number of critical ways. For example, the Northgate Overlay has special setbacks for transitional areas, which helps to mitigate height, bulk, and scale issues. The Draft EIS notes that significant land use impacts from the rezone proposal would "be largely mitigated by land use regulations" (p. 4-19), but later states that SEPA and design review would be used as tools to require additional setbacks or height changes to mitigate aesthetic impacts (p. 4-47). It is not clear if this latter statement still applies, when the Northgate Overlay standards have been taken into account.

Requirements to Provide Affordable Housing

There are many good public policy reasons for encouraging greater density in the Northgate core. Increasing the supply of housing helps to keep housing prices down, particularly in an area where new housing is more affordable than other areas of the City since the market at Northgate does not support high-end housing. Also, given Northgate's existing and proposed transportation infrastructure, there is no better place outside of downtown for the City to accommodate increased density. Northgate is a unique opportunity, and a rezone to stimulate redevelopment is a valid public policy all on its own.

13-6 In our view it is unfortunate that the City has chosen to link the Northgate rezone with a new "incentive zoning" requirement. The Draft EIS notes that the Northgate rezone is unlikely to go forward, unless an incentive zoning proposal is adopted as a new City requirement. P. 2-13. That means the City is unwilling to see an increased supply of moderate, market rate housing as a benefit all by itself, and a partial solution to the lack of affordable housing.

There is substantial concern that "incentive" zoning requirements will actually turn into a disincentive to the needed redevelopment that must occur for City planning goals to be met. The Draft EIS has a single sentence that merely alludes to this. The City commissioned a study of real estate market dynamics at Northgate by the well-regarded Heartland firm. In briefly mentioning the Heartland study, the Draft EIS rather obliquely states that the Heartland analysis "also identified some economic implications of imposing public benefit requirements." P. 2-16. That sentence got our attention, and so we have examined the details of the Heartland study,

What that study concludes is as follows: "At this stage in Northgate's redevelopment, there is reason to doubt that potential developers would participate in the incentive zoning program given the economics of the residential market." Heartland Memorandum, Sept. 10, 2007, p. 3. The study notes that a modest change in development (such as the change from 65 to 85 feet in permissible height, which is a mainstay of the Northgate legislative rezone proposal) "is not enough to spur redevelopment at this time. In these cases, adding an incentive zoning program could result in no redevelopment at all, because there would be no economic incentive to take advantage of the bonus." *Id.*

13-6 In other words, the Heartland study is a sobering dose of market reality. An incentive zoning proposal for modest increases in density will actually serve as a disincentive to development at Northgate. The Final EIS needs to deal with this topic head-on and, using the Heartland study, honestly disclose the adverse effect of the incentive zoning program. All of the benefits of increased density noted in the Draft EIS (which will be further amplified once the discussion of reduction in greenhouse gas emissions is covered in the Final EIS) will be for naught if the City adopts new requirements that make redevelopment too onerous.

It also should be noted how fragile the market/development situation continues to be at Northgate. There are only three large parcels that are likely to be redeveloped in a significant way (Northgate Apartments, the Wallace properties, and the Court at Northgate). Thus, a new "incentive" zoning requirement will place a disproportionate burden on redeveloping these properties, providing a disincentive for the very properties around which the rezone is planned. These three owners end up being uniquely targeted to help solve complex City-wide issues of affordable housing. Rather than addressing the problem by encouraging increased housing supply, the City is taking steps that threaten those increases in supply.

These three properties, and potentially the Northgate Apartments property alone according to the Heartland study, would bear an unfairly disproportionate burden of providing "public benefits" that should more fairly be borne by the larger community. The reality of likely developable real estate in the Northgate study area places the burden of meeting the public benefit of workforce housing squarely and solely on these three properties.

13-7 The extent to which the "incentive zoning" acts as a disincentive needs much further discussion in the Final EIS. As just one example, what is the effect on receiving Federal funding for light rail if more density is not achieved at Northgate? How much additional funding in property, sales and B & O taxes will the City be forfeiting if more density is not achieved at Northgate? By linking the legislative rezone with a new "incentive zoning" requirement as a single course of action for SEPA purposes (p. 2-13), the Final EIS has an obligation to assess these issues in greater detail.

13-10 In addition, the Draft EIS asserts that "one certain effect" of the proposed incentive zoning proposal is that some affordable housing will be built. This statement needs modification in the Final EIS. First, it is only true if redevelopment at the higher height limits actually occurs. Second, even assuming such redevelopment, having to provide 11% of the units as affordable for 50 years has the effect of making the other 89% of the units more expensive. This is the case whether the developer physically provides the units or pays the fee in lieu. We understand the reluctance to acknowledge this trade off, but it is inherent in the City's proposal. This trade-off was not necessarily of consequence when the downtown incentive zoning was adopted, because all new subsidized housing downtown is inherently high-end. However, in a place like Northgate where the market supports much more affordable housing, the adverse effect on 89% of the new housing supply is much more significant and needs to be acknowledged.

Finally, it is not at all clear that the proposal to upzone by one increment provides enough additional density to make it worthwhile to build at the higher height limit. The basis for the analysis in Appendix A is not clear. We do know that a 65 foot height limit allows a very efficient “5 over 1” type of residential construction, whereas a building at 85 feet is an entirely different, and much more expensive, building type. Thus, a developer must assess how many additional residential units can be achieved going from 65 to 85 feet, as compared to the substantial increase in construction costs of a building at 85 feet.

13-11 There is substantial concern that the incremental cost to build to 85 feet will not justify redevelopment to that height. Rather, redevelopment would occur, if at all, to the lower height of 70 feet and thereby either eliminate the likelihood of additional residential units being developed or limit the actual number developed to significantly less than the projections set forth in the Draft EIS. Unfortunately, the Draft EIS does not analyze the issues in this way, and thus prevents a full understanding of whether developers are likely to utilize the increased height and density allowed by a rezone that is coupled with the expense of an “incentive zoning” requirement.

13-12 The concerns outlined above lead us to two conclusions. First, the Final EIS needs to assess these issues in much more detail. Secondly, if the City is going to link adoption of an “incentive zoning” proposal to the Northgate rezone, we strongly suggest that the revisions to Alternative 1 described above be advanced, and that both the affordable housing and other benefits payment only apply to those buildings that are above 85 feet. Only above 85 feet are the density increases substantial enough (in light of increased construction costs) to warrant imposition of an additional fee. This approach would also avoid penalizing the affordability of housing units built below the 85 foot limit.

Relationship of Alternatives to Housing and Job Targets

13-13 We are concerned that a casual reader of the Draft EIS may assume that no rezone is necessary for Northgate to meet its housing and job growth targets, even though substantial experience shows that not to be the case. The Final EIS needs to more clearly state that the rezone is necessary to achieve not just growth targets, but the Comprehensive Plan vision for this critical Urban Center. The comments below highlight that the Draft EIS has a confusing discussion of these issues.

13-14 The No Action Alternative assumes that sufficient “zoned capacity” currently exists to accommodate enough growth for Northgate to meet its Comprehensive Plan growth targets. P. 2-2. However, zoning capacity is quite different from actual construction on the ground. Just because there is theoretical “capacity” based on a mapped zoning designation does not mean that development is feasible or likely. This distinction is critical. Northgate has had this theoretical zoning capacity for a long time, but as noted in the Draft EIS (p. 2-17), without a rezoning stimulus for housing, growth will lag considerably behind zoned capacity.

13-15 Moreover, the impression should not be given that Northgate meets or will meet its Comprehensive Plan *job growth* targets, even if it were somehow to meet its dwelling unit target. For example, the discussion on page 4-2 notes that under the No Action Alternative, there is only capacity to meet approximately 24% of the goal for employment growth. The Final EIS should have an expanded discussion of how existing jobs and dwelling units stack up against adopted targets for both categories, and the negative impacts of continuing the present imbalance between housing and jobs.

13-16 Related to this is the discussion of the No Action statistics for net growth in housing units and commercial square footage on pages 4-2 and 4-3. The explanation of that table on the bottom of p. 4-2 states that it “shows how the capacity of each subarea compares to the growth target for the Northgate Urban Center.” However, Tables 4-1 and 4-2 on page 4-3 do not state the growth targets, and thus, do not allow the reader to compare the capacity of each subarea to those targets.

13-17 Also, there is some inconsistency on whether household and job targets would be met under Alternative 1. Page 1-2 states that all the rezone alternatives assume the City’s adopted household and job targets (2,500 new households and 4,220 new jobs by 2024) will be met. However, the stated increase in new jobs from Alternative 1 is only 3,080 jobs (p. 1-7), which is less than the job growth target. The implication is that Alternative 1 would not meet job targets, and this should be clarified.

13-18 Finally, the EIS analysis of housing and job targets should be updated to reflect VISION 2040, adopted by the Puget Sound Regional Council shortly before the Draft EIS was issued.

Transportation

13-19 Nearly the entire Transportation section of the Draft EIS is devoted to cars, and how the number of car trips are distributed on area streets. With respect to transit, the Draft EIS notes that the proposed densities “would promote and support increased transit use in the area” but then goes on to comment that demand for transit service will increase, as if the latter is a negative impact. P. 4-65. In this regard, the Draft EIS missed the opportunity to explore how the rezone proposal can advance transit use, reduce the number of car trips, and thereby advance City goals on reduction of greenhouse gas emissions.

13-20 The Draft EIS (p. 1-10) states that the issue of greenhouse gas emissions will be addressed in the Final EIS. Consistent with the City’s leadership on this issue, we suggest that the Final EIS needs to include an assessment of how encouraging density in the Northgate core, in close proximity to commercial uses and a transit center, can have collateral benefits of increasing transit use and reducing vehicle miles traveled. This is a critical planning objective for the rezone – add density in an Urban Center with exceptional transit facilities – and this land use change would have significant environmental benefits that should be acknowledged in the Final EIS.

13-21 Also, page 3-8 notes that certain properties are “Super Blocks” due to their large scale. The Draft EIS does not call for street dedications through such properties, and we definitely concur with that approach. The location and configuration of an internal circulation road on “Super Block” properties can only be defined based on a particular development. In the context of review of a specific development, the particulars of an internal road and how to make a more friendly pedestrian environment can and will be examined. To mandate dedication of particular right-of-way, in advance of a development, would significantly impair development flexibility. Also, such street dedications were not proposed as part of the CTIP analysis, and to add a new street through the Northgate Apartments property would change localized traffic patterns in ways that have not been analyzed in the base traffic analysis or Draft EIS. Thus, how access is to be addressed on so-called Super Blocks should be part of individual project review, and not mandated as part of the rezone.

13-22 With respect to traffic mitigation, some clarifications are needed, particularly with respect to potential impacts on the Northgate Apartments property. The summary on page 1-9 describes

13-22 two mitigation measures involving acquisition of additional right-of-way. It is not clear what specific properties would be affected by the mitigation measures, and this needs to be rectified in the Final EIS.

13-23 In addition, the mitigation for the 3rd Avenue NE/Northgate Way intersection is described as potentially being unreasonable (p. 4-75), or as the cause of significant impacts (p. 4-76). The nature of those impacts, and the solution to them, needs to have expanded discussion in the Final EIS.

13-24 Lastly, the Draft EIS analysis assumes completion of certain CTIP projects. This assumption needs more explanation to understand how the timing of adoption of the rezone proposal would related to the schedule for implementation of the CTIP projects.

Conclusion

We appreciate the opportunity to comment on the Draft EIS and look forward to continued participation in the rezone proposal. We are available at your convenience to discuss our comments and concerns.

Very truly yours,



Vincent J. Mully, Managing Member
Northgate Plaza, LLC

cc:
Melody McCutcheon
John Houlihan

ND: 19295.002 4832-8852-0962v1

Letter 13: Mullally Development Company

1. Your comments are noted. The Draft EIS acknowledges that the subject property is an “opportunity site” that has been identified in recent planning efforts. The Urban Center Rezone alternatives examine a variety of zoning and intensity options for this property. The split zoning for different portions of the property is intended to reflect the land use context of the site, including its adjacency to I-5 on the west, and to the new public park that is planned to the east. Final EIS Alternative 3, described in Chapter 2, would increase the heights that may be achievable through a contract rezone of the property; the property owner would determine which zoning designation(s) to propose.
2. Your comments, providing more input about the negative implications on development of Midrise zoning versus other zoning choices, are noted. Please see the response to the previous comment.
3. Your comments, requesting a 125-foot height limit to improve design flexibility, are noted. Please see the response to Comment No.1 above.
4. Your comment regarding density limits in NC zones is noted. The description on page 3-3 was overly brief and did not acknowledge the density limit for the NC zones that is applicable to total building floor area. In contrast, the DEIS land use discussion is intended to indicate there is no limitation on the number of dwelling units on a given property according to the property’s size, as is present in the Lowrise zones. The reference on page 4-26 accurately portrayed this lack of a residential density limitation per lot area.
5. Northgate Overlay District development standards (SMC 23.71) such as those defining special setbacks for transitional areas would indeed contribute to improved height and bulk relationships and transitions between adjacent zones. In many specific cases, these setbacks might be interpreted to be sufficient to control height and bulk and transitions, such that other mitigation would not be needed. However, the use of the term “largely mitigated by land use regulations” acknowledges that future development proposals would need to be reviewed to see if any unusual circumstances would exist and indicate a need for additional mitigation strategies beyond those of the Land Use Code, including the Northgate Overlay provisions. A similar outlook is reflected in the second citation about aesthetic impacts (DEIS page 4-47). Despite the regulation provided by the Land Use Code, in future project-specific reviews – including SEPA and design review -- it may be appropriate to require a variety of design modifications, which could include added setbacks or height modifications for portions of buildings. Therefore, both of these DEIS statements are accurate.
6. Your comment regarding statements in the Heartland study and concerns about incentive zoning are noted. The incentive zoning program was adopted by the City Council in December 2008. It applies city-wide and is not unique or specific to Northgate. It is an adopted regulation and therefore not a subject that requires further evaluation in this EIS. The City will review the results of the program in 2010. Note that code amendments described in the Final EIS could broaden the incentive zoning program in Northgate to include elements related to pedestrian connections, streetscape improvements, sustainable design, and open space.

7. Please see the response to Comment No. 6 above.
8. Please see the response to Comment No. 6 above.
9. Please see the response to Comment No. 6 above.
10. It is acknowledged that additional affordable housing units would only occur if rezones and subsequent redevelopment at the higher height limit actually occurred. Please see the response to Comment No. 6 above.
11. Your comment is noted. Please see the response to Comment No. 6 above.
12. Your comment is noted. Please see the response to Comment No. 6 above.
13. Please see the response to Letter No. 12, Comment No. 1 regarding growth targets.
14. It is acknowledged that the development capacity identified for each EIS alternative is hypothetical and may differ from what is achievable on a specific site in the context of a specific development proposal. However, as described in the land capacity appendix of the Draft EIS (Appendix A), the methodology is based on development experience in the City over time. Your comment notes correctly that capacity does not automatically equate to development. On the other hand, development cannot occur without sufficient capacity.
15. The point about job targets is noted. Please see the response to Letter No. 12, Comment No. 2.
16. This comment correctly indicates that the relationship of growth within each rezone sub-area to the Northgate Urban Center growth targets was not provided in Tables 4-1 and 4-2. Rather, the DEIS text included this information in its discussion of the sub-areas under each alternative on pages 4-3 through 4-11.
17. Please see the response to Letter No. 12, Comment No. 2 regarding growth targets.
18. Please see the response to Letter No. 12, Comment No. 1 regarding the derivation and use of growth targets.
19. Your interest in highlighting the positive effects of concentrated growth in Urban Centers, such as increased transit ridership, reduction of single-occupant vehicle traffic, and associated probable reduction in greenhouse gas emissions, is noted. These kinds of benefits of growth in Urban Centers are acknowledged in the EIS, such as in Sections 2.2 and 4.1.2, but are not discussed in detail. The cited transportation analysis on page 4-65 of the DEIS notes a possible increase in demand for transit service that could be addressed “either through more frequent service on existing routes or through establishment of new routes.”
20. Thank you for the comment regarding greenhouse gas emissions. Please refer to the response to Comment Letter No. 6, Comment No. 4.

21. Your preference is noted. Code amendments under any alternative could propose to expand the existing city-wide bonus program, to include provisions relating to breaking up super-blocks. Bonuses applicable to Northgate could include creating mid-block mews or promenades, enhanced streetscape elements, public open space and sustainability features. Alternative 3 proposes to rely on site-specific contract rezones rather than a legislative rezone of the area.

22. Your comment is noted. The referenced improvements are identified as potential, general means to mitigate identified impacts. They are not required to be evaluated in detail in this EIS (per WAC 197-11-440 (6)(c) (iv)). Further analysis of right-of-way issues and effects on specific properties would occur in the future.

23. The referenced mitigation measures should be viewed as conceptual in nature. Depending on the alternative adopted by the City Council, further analysis of feasibility, right-of-way issues and effects on specific properties would occur in the future.

24. See the response to Letter No. 3 Comment No. 7 regarding the timing of road improvement projects.

Russell Enterprises LLC

June 17, 2008

Mr. Kristain Kofoed
Senior Urban Planner
City of Seattle DPD
PO Box 94019
Seattle, WA 98105

Re: Northgate Urban Rezone Draft EIS

Dear Kristain,

14-1 [The EIS needs to address the outdated super blocks in The Urban Center. Breaking up these super blocks would ease congestion north of the mall. The condition on 3rd Ave can only be described as a bottle neck. Traffic circulation needs to be increased in this area by opening up the closed streets and extending NE 112th westward and creating NE 113th from 5th Ave NE to 1st Ave NE.

14-2 [The goals of the Northgate Urban Center can only be obtained by creating density, ease of walking and traffic circulation. These things coupled with mass transit and the rezoning of the area will improve the community and help to avoid urban sprawl.

Sincerely,

Adam Russell
Property Manager
9594 1st Ave NE #436
Seattle, WA 98115

Russell Enterprises LLC

June 17, 2008

Mr. Kristain Kofoed
Senior Urban Planner
City of Seattle DPD
PO Box 94019
Seattle, WA 98105

Re: Northgate Urban Rezone Draft EIS

Kristain,

14-3 [The goals of the Northgate Urban Center can only be obtained by creating density, ease of walking and traffic circulation. We need to be able to meet the urban planning goals, and create more livable space for people. This can be addressed by proposed rezone. These things coupled with mass transit and the work already underway in the area will improve the community and help to avoid urban sprawl.

14-4 [The EIS needs to address the outdated super blocks in The Urban Center. Breaking up these super blocks would ease congestion north of the mall. The condition on 112th must be addressed. Traffic circulation needs to be increased in this area by opening up the closed streets and extending NE 112th westward and creating NE 113th from 5th Ave NE to 1st Ave NE.

Sincerely,

Matthew Russell
Property Manager
9594 1st Ave NE #436
Seattle, WA 98115

Letter 14: Russell Enterprises LLC

1. Your support for “breaking up the super blocks” by opening new streets at NE 112th and NE 113th Streets west of 3rd Avenue NE is noted. Please see the response to Letter No. 13 Comment No. 21 for further discussion of this topic.
2. Your support for achieving Northgate Urban Center goals by creating density, and improving pedestrian walkability, traffic circulation and mass transit service, is noted.
3. (2nd letter from Russell Enterprises LLC) Your support for achieving Northgate Urban Center goals by creating density, and improving pedestrian walkability, traffic circulation and mass transit service, is noted.
4. Your support for “breaking up the super blocks” by opening new streets at NE 112th and NE 113th Streets west of 3rd Avenue NE is noted. Please see the the response to Letter No. 13 Comment No. 21 for further discussion of this topic.



May 23, 2008

Mr. Kristian Kofoed
Senior Urban Planner
City of Seattle DPD
PO Box 34019
Seattle, WA 98104
Kristian.Kofoed@seattle.gov

Re: Northgate Urban Center Rezone Draft EIS

Dear Kristian:

Wallace Properties hereby requests that the City of Seattle increase the zoning of our Phase II parcels to NC3-125. Further, to meet the urban planning goals of our region, the NC3-125 zone should be applied to most of the Study Area of the Northgate Urban Center Rezone.

Wallace Properties represents the owners of the 7 parcels of property located on the corner of NE Northgate Way and 5th Avenue NE. On the west two parcels (-9307 and -9038) we are currently building 507 Northgate, a mixed use project with 55,000 square feet of retail and 163 residential apartment units (See www.507northgate.com). We intend to redevelop the 5 eastern parcels (-9193, -9083, -9158, -9454 and -9270), commencing construction at some point in 2012 (Phase II).



Impacts of Proposed Rezone on Phase II. Under the current zoning we are entitled to build to 65' in height. This yields 220 residential units and 55,000 square feet of retail. If the Phase II parcels were rezoned to NC3-125, we could double the number of residential units to 440.¹ If the zoning is changed to NC3-85 we would only be able to build to the building code limit of wood frame construction (70'). It would not be cost effective to switch to steel or concrete construction for only two additional floors of residential.² This problem would be exacerbated if an incentive zoning (IZ) requirement were in place. We would be forced to build to the current 65' to avoid paying the extra IZ fees.

Zoning	Bldg. Height	Residential Units	Retail Area
NC3-65	65'	220	55,000
NC3-85 (no IZ)	70'	220	55,000
NC3-85 (IZ)	65'	220	55,000
NC3-125 (no IZ)	125' likely	440 likely	55,000
NC3-125 (IZ)	65' likely	220 likely	55,000

¹ To build to 125' we would need to justify the costs of converting from wood frame to concrete construction (concrete is more expensive than wood), increased costs of structured parking and increased costs of the incentive zoning (IZ) program. The more the incentive zoning program costs the less likely it is that we will be able to build higher than the current zoning. Revising the Northgate parking code could reduce the costs of structured parking.

² Importantly, going from 65' to 85' is not likely to generate any additional residential units because of the cost of moving from wood frame to steel or concrete construction for buildings taller than 70'.

Wallace Properties, Inc.
330 112th Avenue N.E.
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Bellevue, WA 98009-4184
(425) 635-9976 / FAX (425) 646-3374
www.wallaceproperties.com



Rationale for Increasing the Phase II Parcels to NC3-125.

- The stated goal of the Draft EIS is to stimulate the construction of affordable housing. The 125' zoning for Phase II would make it possible to double the number of workforce housing units that could be located on our site, from 220 to 440.
- Because of its strong retail location, with the exception of perhaps the Mullaly property, no other lot in the study area has the market potential to be developed to 125' in the next decade.
- The property is far from any single family residential area.
- Given the right turn for east bound traffic on Northgate Way, the traffic impacts are significantly reduced for lots south of Northgate Way than they are for lots to the north.
- These lots are within 1/2 mile (walking distance) of the Northgate Transit Center. The region's massive investment in light rail mandates high density residential within walking distance of the planned light rail stations.
- There are no residential units on the lots, so new construction will not displace existing families or remove existing units from the housing stock.
- We intend to use the additional height to build residential, as opposed to office.

To Meet the Urban Planning Goals of the City and the Region, The City Should Increase Most of the Other Parcels in the Study Area to 125'.

- Additional residential development must occur in Northgate in order to accommodate future growth in accordance with the City of Seattle's Comprehensive Plan and the PSRC's Vision 2040. Northgate is one of only 6 Urban Centers in Seattle, so a great expansion of residential density must occur in the Northgate Urban Center in order to accommodate the region's projected population increase without creating more urban sprawl.
- It is not remotely possible that 3,160 residential units will be delivered within the Focused Rezone Study Area with an increase to only 85'. In the next decade it is highly unlikely that any lots other than Phase II, Potter and Mullaly will be redeveloped no matter what the zoning. Full redevelopment of these three lots under NC3-65 or NC3-85 zoning is only likely to produce an additional 750 units. An increase to 125' could double that count.
- New development will enable Northgate to complete its revitalization from an auto oriented retail area to a high density mixed-use pedestrian oriented urban center. The more flexible/permissive the zoning the more likely that a property will be redeveloped.
- The 125' height limit was unanimously supported by the Northgate Stakeholders for the entire Northgate Urban Center (See Draft EIS, §2.2.6).
- Since NC3-85 and NC3-125 both have an FAR of 6, the 125' designation would result in more open space, less bulk and more modulation than NC3-85.
- Northgate UC sits in a valley so there is little view impact to the surrounding area.

The City needs to reach higher if it is to meet its share of the population demands over the next 30 years. An increase from 65' to 85' will not produce one additional residential unit. If our goal as a region is to create density and link it by transit, thereby avoiding urban sprawl and environmental degradation, Northgate Urban Center must bear far more of the density than any alternatives called for in the Draft EIS. The Phase II property is one of a very few locations in the Northgate Urban Center where 125' buildings might be viable. I urge the City to increase the Phase II land zoning to NC3-125 and to do so in other parts of the Study Area as well.

Sincerely yours,

Kevin R. Wallace
General Counsel and V.P. - Acquisitions

Letter 15: Wallace Properties, Inc.

1. Alternative 3, described in Section 2.5 of the Final EIS, would increase the numbers of sites on which 125-foot high buildings could be developed in the study area. Under this alternative, a legislative rezone would not occur and property owners would propose individual contract rezones. Under any rezone alternative in the EIS, an expansion of the range of bonus elements available in Northgate under the City's adopted incentive zoning program is proposed.
2. An objective of the rezone alternatives is to increase redevelopment potential within a portion of the Urban Center as a means to achieve city-wide and neighborhood land use policies. The alternatives examine the effects of emphasizing varying mixes of land uses, and different heights and intensities of uses. Final EIS Alternative 3 identifies the impacts of allowing a greater number of sites to propose contract rezones to achieve a height of 125 feet.
3. Your citation of Northgate Stakeholder Group support for 125-foot height limits, as indicated in Section 2.2.6 of the DEIS, is noted.
4. Your observation is noted that more open space, less bulkiness and more modulation of bulk in future development would occur under a NC3-125 zone compared to a NC3-85 zone because both zones have an FAR of 6.
5. Your comments describing topographic conditions and view impacts in the study area are noted.
6. Your summary comments advocating for the NC3-125 zone on your property are noted.

From: "Braden, Kathleen" <kbraden@spu.edu>
To: <kristian.kofoed@seattle.gov>
Date: 5/31/2008 8:47 AM
Subject: comment on Northgate EIS

Please accept this email by way of public comment on the draft EIS for the Northgate rezone. Two concerns I have about the EIS relate to

16-1 1. bicycle lanes under EIS, Bicycle Master Plan, and CTIP for Northgate area-will the bike-pedestrian overpass envisioned for I-5 still be included and if not, will greater housing or commercial densities along Northgate Way make bike access more difficult? Given this is a major transit corridor for people from more densely built up Aurora area, if the Sound transit station goes in as envisioned, more bicycle access may cut down on commute to the transit station or services at Ngate mall. This is a very difficult bike route to negotiate. Many of the enhancements called for for bicycles or pedestrians seem to focus on north-south routes more than the limited east-west ones.

16-2 2. the employment-residency relationship foreseen in the goals to make the region more dense, have more affordable housing, and diminish auto traffic seems to envision people walking more to work. Given the high number of service jobs in this neighborhood and the high percent of foreign born residents from the 2000 census (20% for the Northgate Maple Leaf neighborhood), is it realistic that the population moving in to this area under Alternatives 1 and 2 will be likely to work in the same neighborhood and therefore be less likely to want automobiles? In other words, the relationship between employment, propensity to use automobiles, and housing stock did not seem adequately explored or discussed in the EIS.

Kathleen Braden
9743 Densmore Ave N.
Seattle WA 98103

Letter 16: Kathleen Braden

1. Your comments on the merits of pedestrian/bicycle routes, and seeking east-west bicycle and pedestrian route improvements including an I-5 overpass bridge, are noted. Its conceptual advantages in connecting to/from points west of I-5 are acknowledged.
2. Regional and City policies for Urban Centers are reinforced by the premise that denser centers that are well-connected by nearby transit service will increase the transportation options of more residents, leading to more frequent use of transit and non-single-occupant vehicle modes of travel. This means more than just “walking to work” in the same center; it also means the ability to walk to transit routes and to move around the greater metropolitan area more easily without using an automobile, relying on various other modes of travel. Therefore, the rezone alternatives are not premised only on the assumption that some new residents will also work in Northgate.

From: Kristian Kofoed
To: norabee2001@yahoo.com
CC: Fischburg, Paul
Date: 6/17/2008 4:30 PM
Subject: Re: Northgate Rezone comments

Thank you for your comments, Nora. They will be included in the public record of comments on the DEIS.

Kristian Kofoed
Senior Urban Planner
City of Seattle, Dep't of Planning and Development
206 233 7191

>>> Nora Buetner <norabee2001@yahoo.com> 6/16/2008 10:45 PM >>>

I attended the community meeting regarding the Northgate rezoning and would like to add my comments to be considered.

17-1 It appears to me that most of those in favor of the increased height limits and boundaries were the developers and those who would benefit from that redeveloping. I have been a homeowner in the Northgate area since 1977 and I feel that much of the redevelopment is not good for the residents of this immediate neighborhood. I live at 10734 14th Ave. N. E. and I like this little pocket of residential homes with a somewhat rural feel. The traffic volume has increased greatly since we moved into the area and will only get worse with additional development. If you want to create housing and jobs in this area we will need better transit availability so that people can leave their cars at home. A bike lane to provide safe commuting for bikers is a must. And if you want to increase pedestrian traffic, we need walkable sidewalks - wider and clean.

17-2 The height limits of 65, 85 and 125 do not mean much to me. I would like you to convert those limits into how many floors that would equal. The developers want the higher limits but is that good for the area? I walked over to count the floors on the Northaven Retirement Home and that is 8 floors. I think that is high enough and I would prefer 6 floors - would that be 65 ft. Personally, I like the openness and don't wish to have the light blocked out by several tall buildings. An urban center does not need to mimic downtown Seattle with highrise buildings. Please keep the limits on the lower side.

17-3 What I would like to see is some development but not big box stores (the Wallace has anchor stores of Circuit City and Office Max). To date we have Ross, Best Buy, Target, two discount shoe stores, Bed Bath & Beyond, and Walgreens. Are you trying to make this into another Lynnwood corridor? I hope not! Can't we have development with character and a community feeling? That doesn't come with big box stores but it would be attainable with small independents (bakeries, coffee shops, boutiques, maybe a PCC or Trader Joes. Ballard vs. Lynnwood? Currently there are many vacant business sites - will this area support more commercial and retail?

17-4 As far as the proposed corridor extends, concerns me. I do not want the development to extend beyond Roosevelt to the east because that is where the residential neighborhood begins. Neither do I want it on Pinehurst and 15th N. E. Development spreads like a fungus once it gets started.

I do hope that you take these comments into consideration and think first of how this will affect the residential neighborhoods.

Thank you and hope to hear from you soon.

Nora Buetner
10734 14th Ave. N. E.
Seattle, WA 98125
206-363-5117
norabee2001@yahoo.com

Letter 17: Nora Buettner

1. Your comments about the need for increased transit service, bicycle lanes and wider sidewalks to serve future growth are noted. Note that the Northgate CTIP includes some of these items, and other actions evaluated in this FEIS include and would likely lead to additional transit, bike and pedestrian improvements. In November 2008, the region's voters approved funding that would allow Sound Transit to extend light rail to Northgate in approximately 2020.
2. The height limits of 65, 85 and 125 feet generally correspond to 6, 8 and 12 stories, respectively; some building designs may be able to fit an additional partially below-ground level, plus additional below-ground parking levels. Your preference for height limits of 65 feet or 85 feet is noted.
3. Your preference for smaller independent commercial businesses rather than big box retail stores is noted. In addition, existing and proposed design guidelines, land use regulations and incentive programs all generally regulate against big box retail surrounded by surface parking.
4. Your preference to avoid extending growth east of Roosevelt Way or onto Pinehurst Way or 15th Avenue NE is noted. Note that this area is excluded from Final EIS Alternative 3.

**Comments by 360 Degree Hotel Group
At Northgate Draft EIS Upzone Public Comment Meeting
Wednesday, May 28, 2008**

My name is Shaiza Damji, and my family owns the property on the west side of I-5 more commonly referred to as the Hotel Nexus and the restaurant formerly known as the Berkshire Grill, soon to be re-opening as the Saffron Grill. Our property is approximately 2.5 acres, is an integral part of the Northgate Urban Center and is part of Study Area A in the Draft EIS. We are currently zoned at 65 feet commercial.

Underlying my comments tonight is the critical theme that we want people living and working at Northgate, not just driving to Northgate to park and take transit downtown.

I would especially like to commend the City of Seattle for taking the initiative to consider the upzoning of Northgate Way and other relevant properties in the Northgate Urban Center, and also wish to thank the City for its tremendous support of the Northgate Stakeholders Group since 2003. The Stakeholders Group has been able to address large lot development in the Northgate Urban Center through consensus building and also developed the Coordinated Transportation Investment Plan known as CTIP. I have served on the Northgate Stakeholders Group since its inception and was particularly involved with the CTIP subcommittee.

My understanding from the Draft EIS is that the objective of the upzone is to ensure that (1) the recent momentum from the Stakeholders Group is sustained; (2) that growth can be accommodated; and (3) the Northgate Comprehensive Plan's goal to "transform an auto-oriented landscape to a pedestrian friendly destination with densities to support transit" is achieved.

With all of this in mind, I have two major points this evening which are:

1

(1) The Focused Rezone contemplated by the Draft EIS should be rejected as it really does not make sense with respect to the west side of the freeway. It treats the west side of the freeway differently from the east side of the freeway and it is really not clear why. The EIS itself explicitly concludes in Section 1.7 that there is no significant difference between the delay conditions at [the] intersection [of Meridian and North Northgate Way] under any of the alternatives when compared to the No Action Alternative. In fact, the Draft EIS states that there is a possibility that average delays at this intersection could actually decrease to some degree under the Broad Rezone. If this is the case, why treat the west side of the freeway differently? I remind all of you that the CTIP does contemplate several initiatives on Northgate Way west of the freeway to mitigate traffic and improve pedestrian connectivity – in particular I would encourage you all to look at CTIP item C-12 which would improve the pedestrian connection under Northgate Way from both a design and pedestrian safety perspective. This item is slated as a Near-Term item. If we create a more pedestrian-friendly environment we will have more pedestrians. It is crucial that the west side of the freeway be considered part of the Northgate Urban Center not only in name but in action and the Focused Rezone does not do this.

(2) My second point is to encourage the City to seriously consider the advice of the Stakeholders Group dated April 2007, to seriously consider heights of up to 125 feet in additional properties along Northgate Way. It is difficult for us really to imagine Northgate as an Urban Center, but it really will happen, particularly with the advent of rapid transit. With rising gas prices we have all seen how nationwide and specifically in Seattle people are reconsidering their driving habits. It would be unfortunate if the City did not really seize this opportunity that it has itself provided to reconceptualize Northgate as a true urban center while maintaining its unique single-family neighborhood characteristics. The City should seriously consider heights up to 125 feet along Northgate Way.

2

- I will use our property as an example. We have owned the property for over 32 years and are very committed to Northgate in the long term. Our thinking for the property is long-term and will require substantial thought and consideration and working with the City and the community.
- We are currently zoned NC3-65 while the property across the street is zoned NC3-85. Under the No Action option and the Focused Rezone option, there would be no redevelopment of the site and certainly no residential development on the site. Under the Broad Rezone the property would go to 85 feet which might theoretically allow redevelopment but such redevelopment may be sub-optimal, particularly in the urban center context, as well as potentially cost-prohibitive.
- If the property were rezoned to 125 feet, we could maximize the potential of the site in a mixed use development, with a blend of uses which could include hotel, residential, and other attractive uses. At present there is no residential opportunity on our site and the best way to encourage residential multi-family development in a mixed use context would be to allow for 125 feet on this site.
- This redevelopment really makes sense in the context of light rail coming to Northgate.
- As stated by the Draft EIS, any property that takes advantage of the new upzoning would remain subject to project-level SEPA.

18-5 just driving to Northgate in order to park and take transit. A proposal that does not seriously increase density will result in just that.

18-4

18-5

I strongly encourage all of us to support the city in considering upzones to the Northgate Urban Center as contemplated in the Broad Rezone rather than the Focused Rezone, and in addition to consider zoning of up to 125 feet on Northgate Way. We want people living and working in the Northgate area, not

Letter 18: Shaiza Damji, 360 Degree Hotel Group

1. Your preferences to see people living and working in the Northgate Urban Center and traveling by transit are noted.
2. Your description of the rezone objectives does not precisely correspond to the stated objectives in Section 1.3 of the DEIS, but does reflect a number of goal-related statements included as “background” in Section 1.2 of the DEIS. The “momentum” referenced in the DEIS is to continuing the pace of “public and private development projects that are revitalizing Northgate.”
3. Your comments objecting to Alternative 2’s lack of rezones west of Interstate 5, and the relative lack of differences in identified average delays at intersections in the impact analyses, are noted. Please refer to Alternative 3 in the Final EIS, which could result in further intensity of development west of I-5.
4. Your preference to consider height limits up to 125 feet on additional properties along Northgate Way, to reinforce urban center density objectives and related transportation benefits, is noted. Please refer to Alternative 3 in the Final EIS, which includes additional locations east and west of I-5 where heights of 125 feet could be achieved through individual contract rezones.
5. Your preferences for supporting the Alternative 1 Broad rezone plus consideration of height limits up to 125 feet are noted. Some of these elements are combined in Final EIS Alternative 3.



Northgate Legislative Rezone
Environmental Impact Statement
Draft EIS Comment Form
May 28, 2008

Agencies, tribes and members of the public are invited to submit comments on the scope of the EIS for the Northgate Legislative Rezone. You may comment on the rezone alternatives, the analysis of impacts, or mitigation measures in the Draft EIS. All comments will be responded to in the Final EIS.

You may use this form to provide comments; please use the other side if you need more room. Please be as specific as possible. You may give the comment form to a staff member at tonight's meeting, or mail it to the address below by **June 2, 2008**. Thank you for your interest in Northgate.

From 6/10/08
Chamberlain / Jackson's
Broad Rezone

19-1

19-2

They hope to for the redevelopment of parcels within the zone area. If height restrictions limit the possibility of development to the point that the highest amount of ~~development~~ ^{development} is afforded it, then if supporting will help them support, then it should be allowed to upgrade transportation as our main concern - Improving should be with if the requirement to mitigate traffic problems created by the additional density. - I am also interested in low income housing, and am interested in traffic flow

Name MARINA FLORES
Address 2511 7th Ave N

Mail/Email To: Kristian Kofoed
City of Seattle Department of Planning & Development
P.O. Box 34019
Seattle, WA 98124-4019
kristian.kofoed@seattle.gov

19-3

*We need sidewalks and safe crossing.
As a member of the Northgate Stabilization Group since its beginning and a committee person for the CPO, make, I am adamant about mitigating traffic and pollution problems at the same time, properties are being developed ^{with traffic mitigation}
with the need in priority I still would like to see height limit to 25'*

Letter 19: Marilyn Firlotte

1. Your preference for future infill development in the study area and support of zoning that would provide feasibility for development is noted.
2. Your interest in seeing sufficient impact mitigation of traffic impacts from additional development is noted. A comprehensive program of traffic improvements is included in the Northgate CTIP, and the EIS identifies some possible additional mitigation measures for specific intersections in certain rezone alternatives. In addition, individual development projects would be reviewed to ensure that sufficient improvements have been identified and are planned or in place.
3. Your interest in seeing sidewalk, crosswalk and traffic mitigation improvements at the same time properties are developed is noted. Your stated preference for seeing height limits to 125 feet is also noted.

From: Kristian Kofoed
To: Jones, Laura
CC: Fischburg, Paul
Date: 6/2/2008 12:59 PM
Subject: Re: public comment on Northgate Urban Center Rezone Draft EIS

Thank you for your comments.

Thanks, Kristian
206 233 7191

>>> laura.jones <new2008@yahoo.com> 6/2/2008 8:43 AM >>>

Thank you for this opportunity to express our opinion:

We are dissatisfied with the proposal to add even more residential, mixed-use & traffic congestion to Northgate Way even before we have integrated construction of large apartment complexes currently being built.

The public benefit needs to prioritize open space, transportation & streetscape improvements (converting northgate way into a pedestrian mall would be preferred) instead of making these factors a slight possibility under "limited circumstances"

Current & future residents of the in-process residential units would value such improvements over a specified obligation to provide affordable housing for more people to move into from outside the area.

We think a determined & serious effort to improve mass transportation, walking & bicycle paths would be the best continued project; it would be an opportunity to provide a prime example of conservation & sustainability to the city, vs. the trend of relentless growth.

Already there is density & motivation for supporting mass transit, but we need more mass transit & open spaces for walking/bicycling ... instead of more residents.

The plan for pushing even greater density should be abated until we accommodate the current resident population & the increased housing now being built.

We heartily support "no action", at least until the current building projects are completed & the new population installed.

Tom Bannister
& Genise Lee

20-1

Letter 20: Tom Bannister & Genise Lee

1. Your preferences for the No Action Alternative, and to see open space, transportation, streetscape, transit and walking and bicycling improvements made before additional development is allowed, are noted.

From: Ryan Miller <ryanmiller_37@hotmail.com>
To: <kristian.kofoed@seattle.gov>, <paul.fischburg@seattle.gov>
Date: 5/28/2008 11:13 PM
Subject: Northgate rezone

Kristian and Paul,

Here are my additional comments / concerns that I didn't mention in my previous e-mail that you asked me to send you tonight....

21-1 -If the rezone is approved, flooding may occur as a result of trees and grassy areas being replaced by concrete (especially in the area of Northgate that was once swamp land), so the drainage system will need to be improved in the Northgate area.

-The following are pedestrian safety and traffic calming measures that need to be in place before a rezone should be considered:

21-2 -Light rail stops in northgate
-parking garages, especially on the business properties that will be redeveloped
-pedestrian bridges and/or more crosswalks across NE 103rd, 5th Ave NE and Northgate Way
-sidewalks in the residential areas east, south and north of the mall as there will be increased traffic in the neighborhoods as a result of many more businesses and residences in northgate.
-Northgate Way, NE 103rd, 5th Ave NE and 1st Ave NE streets need to be widened to prevent another Mercer mess.
-The off-ramps and on-ramps from I-5 to Northgate Way, Corliss Ave., Northgate way, 5th ave NE and 1st Ave NE will need to be expanded to handle the increased traffic volumes as most of the people who work in this area at the retail shops, offices and restaurants will not be able to afford to live in this area.
-bike paths
-more bus stops and routes in the Northgate area

21-3 -Because retail and mid to high rises keep encroaching on residential areas the zoning loopholes that allow residential zones to become business zones (such as the Safeway in Pinehurst) need to be closed so the residential zones in the northgate neighborhood aren't upzoned/rezoned as well and our neighborhoods aren't developed into oblivion.

21-4 -Finally, residents in the Maple leaf, Pinehurst, haller lake, victory heights and flicton springs neighborhoods should be surveyed to get a true sense of residents' opinions as it seems very few people who live in the affected areas are aware of the possible rezone.

Thanks for your time,

Ryan Miller

From: "Mayor's Office and CSB (imailagent)" <CSBandMayor@crm.seattle.gov>
To: <ChinnBL@seattle.gov>
Date: 5/19/2008 9:20 AM
Subject: WF 756721 - Ryan Miller (Intranet Quorum IMA00549463)
Attachments: IQFORMATFILE.TXT

Dear Bonita

FROM MAYOR'S OFFICE

PLEASE HANDLE AS A DIRECT RESPONSE.

Instructions:

1. Please write a response for the correspondence below. When you name the file, please begin with a letter, not number or #.
2. Attach the file to the email (using reply to sender to this email) by 06/02/2008.
3. Please do not change the subject line on this email message.

Thank you very much!

Mayor's Correspondence Manager

Constituent: Ryan Miller
Seattle, WA 98125
ryanmiller_37@hotmail.com

Subject: Opposes Northgate re-zone (E-mail)

Open Date: 05/18/2008

Department Due Date: 06/02/2008

Issue: DC_ZON/PERMTINQUIRS

Workflow ID: 756721

21-5 Comments: As a resident living in the Northgate area I am against the proposed Northgate rezone / upzone. Our city is being developed in to oblivion and this is the last thing we (Seattle residents) want. The only people this proposed rezone will benefit are the millionaire landowners in this area whose land value will increase as a result of the rezone. It does not benefit the average resident. This is yet another one of Nickels' pro-business proposals. We need a government who is pro-average resident, not pro-business/millionaires. Please do not let this rezone happen. If it goes through, it is just a matter of time before the residential single-family zones in the Northgate area are also upzoned/rezoned and developed into oblivion as well due to Seattle's backwards rezoning policies. Residents in Seattle do not want to become the next New York City. We like our neighborhoods for the fact that there are not towering buildings and that there ARE many trees, open spaces and quiet residential areas. Finally, Nickels has not made the Northgate area more pedestrian friendly as he claims. Instead, because of his pro-business and pro-development stance, he is putting the safety of residents and pedestrians at-risk as the increased number of residential units and businesses are resulting in increased car and foot traffic, yet there have not been similar increases in pedestrian safety measures. Sincerely, Ryan Miller Northgate resident and voter

Letter 21: Ryan Miller

1. Your concerns about flooding impacts due to impervious surfaces, and the corresponding need to improve the drainage system in Northgate, are noted. This type of impact was discussed in Sections 4.7 and 4.8 of the DEIS. Please also refer to the responses to comments in Letter 1 for additional discussion of stormwater impacts. Future development will be required to install improved drainage systems that would help avoid or minimize potential for flooding impacts.
2. Your suggestions for several kinds of street improvements, parking improvements, transit, pedestrian and bicycle improvements to be in place prior to rezoning, are noted.
3. Your objection to allowing rezones of residential land to commercial zones and subsequent encroachment of development in residential areas is noted.
4. The City has conducted extensive outreach and notification in regard to activities in Northgate generally and for this EIS.
5. (2nd letter from Ryan Miller) Your objection to rezoning to higher allowable densities is noted.

From: Kristian Kofoid
To: Fischburg, Paul
Date: 6/17/2008 4:46 PM
Subject: Jena Myers comments Northgate Legislative Rezone

Thank you for your comments, Jena. Your input will be included in the public record.

Thanks, Kristian
206 233 7191

>>> "Jena Marie Myers" <benjena@hotmail.com> 6/13/2008 10:51 AM >>>

Kristian Kofoid
City of Seattle Department of Planning and Development
P.O. Box 34019
Seattle, WA 98124

Re: Northgate Legislative Rezone: support of broad rezone, option 1.

Dear Mr. Kofoid,

As a property owner and developer in Northgate since the 1950's I want to thank you for the time and energy you and many others are putting in on the Northgate Legislative Rezone. Northgate has waited a long time for growth and I'm glad to see the time for it has come.

The properties my family owns are 11222 Roosevelt Way NE, 11300 Roosevelt Way NE, 11335 Roosevelt Way NE, 11325 Pinhurst Way NE and 11754 15th Avenue NE, all except the last of which fall within section D of the Broad rezone, option 1. We welcome the opportunity to develop those locations as sites that will serve to transition between the busy business section of Northgate Way and the neighborhoods of Pinhurst and others. However, we are only able to do this if the city approves option 1 of the broad rezone.

22-1

Without the increase in height, development will be minimal as well as being less than ideal for the neighborhood citizens, visitors and land owners. Going forward with development is dependant on making the numbers work and the current limits on height make it much more difficult for them to do so. In turn, this limits the likelihood of redevelopment, limits the type of development that does go forward, restricts ability to incorporate aesthetic elements into architectural and landscape design and fails to achieve the City's goals for an urban center at Northgate. Alternately, allowing the opportunity for development also creates the opportunity for sidewalk improvements - making the area safer for pedestrians, landscaping improvements - leading to better drainage and improved handling of storm water as well as more enjoyable surroundings, and a broader range of activities to be actualized in the area, making for an actual community where people can live, work and play rather than functioning as a bedroom community for downtown Seattle. Increased height also allows developers to design more interesting and attractive buildings rather than sacrificing architectural interest in order to maximize square footage.

22-2

Limiting the rezoned area to the focused rezone or even the broad rezone, option 2 omits a vital part of Northgate - the areas West of the freeway. Failing to recognize the participation, and thus the needs, of those who live, work and study at North Seattle Community College and Northwest Hospital as a part of the Northgate is a significant error. The reasons noted in the draft EIS for removing this area from the rezoning - traffic failure (note section 1.7) - make little sense as the report notes that traffic will fall in the same spots regardless of upzoning West of the freeway. The positive impact that could be made in terms of affordable housing options and others are significant contributions to an area that needs improvement.

I hope you will consider these things as you move forward in developing the final EIS. Thank you for your time and consideration.

Jena Myers
Jfert Property Management

Letter 22: Jena Myers, Iffert Property Management

1. Your preference for higher height limits and design flexibility for future development in subarea D of the study area is noted.
2. Your support for rezones west of Interstate 5, and corresponding opposition to the Alternative 2 – Focused Rezone, are noted.



Northgate Legislative Rezone
Environmental Impact Statement
Draft EIS Comment Form
May 23, 2008

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23-1

Low income housing mingled with
affordable housing
convenient post office
jamba juice

Name Susan E. D'Patka
Address 1843 NE 141st St SE A, WA 98125

Mail/Email To: Kristian Kofoed
City of Seattle Department of Planning & Development
P.O. Box 34019
Seattle, WA 98124-4019
kristian.kofoed@seattle.gov

Letter 23: Susan O'Patka

1. Your suggestion to intermingle new housing that would serve different income-level households in future development is noted.

 **City of Seattle**
Department of Planning & Development

Northgate Legislative Rezone
Environmental Impact Statement
Draft EIS Comment Form
May 28, 2008

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AS YOU CAN SEE I LIVE ON N.E. 115TH STREET,
TRAFFIC HERE IS EXTREMELY HEAVY (I SUSPECT
DRIVERS USE IT AS A SHORTCUT TO AVOID
NORTHGATE WAY). TO ADD MORE TRAFFIC
HERE WOULD BE HORRIBLE. TO SHUT IT DOWN,
MAKE IT ONE-WAY, OR LOCAL ACCESS ONLY WOULD
BE WONDERFUL. EITHER WAY SIDEWALKS ARE REQUIRED).

Name PETER K. PALMER
Address 11504 7TH NE SEATTLE 98125

Mail/Email To: Kristian Kofoed
City of Seattle Department of Planning & Development
P.O. Box 34019
Seattle, WA 98124-4019
kristian.kofoed@seattle.gov

P.S. THANKS FOR THE FANTASTIC
MEETING. 

24-1

Letter 24: Peter Palmer

1. Your objection to existing and additional future traffic volumes on NE 115th Street east of 5th Avenue NE, and your suggestion to reduce access of cut-through traffic to NE 115th Street, are noted.

June 4, 2008

Mr. Kristain Kofoed
Senior Urban Planner
City of Seattle DPD
PO Box 34019
Seattle, WA 98104

RE: Northgate Urban Center Rezone Draft EIS

Dear Kristain,

As stated by many people at the Public Comment Hearing, the City should be commended for this Rezone. With this kind of leadership Northgate will move ahead to become a vibrant urban center.

25-1 For this rezone to be long term in its effectiveness, the majority of the urban center should be zoned NC 125 with a minimum of NC 85 on the perimeters. That zoning will allow the Center to meet the Urban Planning Goals of the City and the Region for residential units. The 125' height limit was unanimously supported by the Northgate Stakeholders for the entire Northgate Urban Center.

25-2 The EIS needs to address the outdated super blocks in The Urban Center. NE 112nd needs to be extended West to 1st Ave. NE and a NE 113th needs to be created from 5 Ave. NE to 1st Ave. NE. The break up of these super blocks would help reduce congestion on Northgate Way and the bottle neck situation that now exists on 3rd NE for the 370 condo and rental units north of NE 112nd. The Target complex mitigation blocked off 3rd Ave. NE at NE 115th which greatly limited traffic circulation. Super block breakup would also create a better pedestrian environment, traffic circulation and on street parking availability for residents and future park visitors. Super blocks have no place in a modern urban center.

25-3 The goal for our Northgate Urban Center is to avoid urban sprawl, have a livable community and protect our environment; therefore we must create density, ease of walking and traffic circulation, and couple it to mass transit.


Thank you for your attention to this matter,



Rod Russell
Northgate Stakeholder, CitiGate & Court @ Northgate Apts.
11355 1st Ave NE, Suite A-209
Seattle, WA 98125
206.794.2328

Letter 25: Rod Russell

1. Your support for rezoning to NC with a 125-foot height limit in the majority of the Urban Center and a minimum of NC with an 85-foot height limit on the perimeters is noted. Please note that Final EIS Alternative 3 encourages heights of 125 feet on more properties in the study area and avoids rezones in most perimeter residential areas.
2. Thank you for your comments regarding breaking up the “super-blocks” with new street segments at NE 112th and 113th Streets. Breaking up “super-blocks” is a stated planning goal for Northgate. Other related actions proposed in this Final EIS propose design guidelines and incentive zoning provisions that would help create mid-block pedestrian connections, which would further this goal.
3. Your support for Northgate’s Urban Center planning goals are noted.

 **City of Seattle**
Department of Planning & Development

Northgate Legislative Rezone
 Environmental Impact Statement

Draft EIS Comment Form

May 28, 2008

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You may use this form to provide comments; please use the other side if you need more room. Please be as specific as possible. You may give the comment form to a staff member at tonight's meeting, or mail it to the address below by **June 2, 2008**. Thank you for your interest in Northgate.

My family has lived in the Northgate area for over 50 years and we have seen the steady decline of the area since the late 70s. The main thing the urban village concept in this area is that the mall is expected to reach addresses and basically does not care about the people who live around the mall. The freeway is a tremendous hindrance to this concept as too many people use this area as a drive through to get to somewhere else. I know I have written this to the city before, but you cannot seem to see this through the fog.

Name Marvin Schmidt
 Address 10610 Meridian Ave N
Seattle WA 98133
 Mail/Email To: Kristian Kofoed
 City of Seattle Department of Planning & Development
 P.O. Box 34019
 Seattle, WA 98124-4019
 kristian.kofoed@seattle.gov

For the urban village concept to work, you must have 4 elements clicking to make it work. Eating, Shopping, Recreation and walkability must coexist to make the concept work. Right now 2 out of those four I would have to give a poor grade to.

1. Eating: A lot new restaurants have come into the mall and that is probably a good thing
2. Shopping: The mall gets a poor grade on providing services to the people in the area, but Target picks up some slack with providing a little something for everybody. One grocery store in the area is not a good thing, especially when there was 3 or 4 at one time
3. Recreation: New community center is a plus and new park coming in the Park and Ride could be a good thing. But there is no bowling center, pitch and putt golf course, lack of tennis courts etc. Poor grade.
4. Walkability: With so much car congestion in this area and getting worse every day, the city has made no attempt to alleviate this problem

26-2 How is raising building height level going to improve walkability? Try walking on Northgate Way from Meridian to Roosevelt and see what the interaction is between pedestrian and automobiles. This is absolutely a failing grade.

26-3 The trouble with increasing the height limits is you are increasing density and not providing infrastructure for it. What's going to happen is developers are not going to appease the urban village concept. They are going to appease themselves. They're will be way more density and too little amenities. Unless walkability and Recreation are improved for the urban village concept, how can you even think about raising height limits.

Maxim Schmidt
10610 Meridian Ave N,
Seattle, WA. 98133
206-363-1224

Letter 26: Marvin Schmidt

1. Your comments describing hindrances to achieving an “urban village” at Northgate, and evaluating Northgate’s current eating, shopping, and recreation qualities, are noted.
2. Your comments describing traffic congestion and its contributions to poor walkability and lack of pedestrian safety in Northgate are noted. Future redevelopment in the rezoned areas would likely result in sidewalk improvements (sidewalk width and finish qualities) and would improve walkability under any rezone alternative.
3. Your comments about increased density and probable lack of associated infrastructure improvements are noted.

June 13, 2008

Mr. Kristian Kofoed
Department of Planning and Development
P.O. Box 34019
Seattle, WA 98124-4019

Re: Comments on Draft Environmental Impact Statement for Northgate Rezone

Dear Mr. Kofoed:

27-1 I am the General Partner of T & M Jenn LP, owner of the parcel west of Third Avenue NE and north of Northgate Way. The property adjoining the T & M Jenn property on all three sides is the Northgate Apartments. I support the Alternative 1 - Broad Rezone proposal as it is important to increase development opportunities at Northgate. However, I do have three comments or concerns with that proposal.

First, I understand that the Northgate Apartments property would be split-zoned between Neighborhood Commercial 3 and Midrise zone designations. Split-zoning of property definitely is a disincentive to development and reduces flexibility for the site.

27-2 Secondly, the T & M Jenn property is proposed to be zoned Midrise 85, and I believe it is much more appropriate to have a Neighborhood Commercial 3 designation, with a 125 foot height limit. A Neighborhood Commercial 3-125 zone would allow an orderly and coordinated redevelopment of the T & M Jenn property, along with the Northgate Apartments property.

27-3 Third, I do not believe a street should be dedicated through the T & M Jenn property or the Northgate Apartments property. Street dedication would force a particular development pattern, and it is premature for that. The access issue is best resolved when a specific development is proposed and access can be considered through the design review and permit process.

Thank you for the opportunity to comment, and I appreciate your consideration of my concerns.

Very truly yours,

T & M Jenn LP


Mari Lyn Spearbeck
General Partner

cc: Mullally Development Company

Letter 27: Mari Lyn Spearbeck, T&M Jenn LP

1. Please see the response to Letter No. 13 Comment No. 1 regarding split zoning.
2. Your preference for NC3 zoning with a 125-foot height limit in the vicinity west of 3rd Avenue NE is noted. See Chapter 2 for more information about Final EIS Alternative 3.
3. None of the rezone alternatives include dedication of a new street in the specified location.

From: Renee Staton <reneestaton@hotmail.com>
To: Paul Fischburg <paul.fischburg@seattle.gov>
Date: 5/28/2008 6:21 PM
Subject: Northgate - my statement tonight

28-1 Good evening. My name is Renee Staton and I live in the Pinchurst neighborhood.
Thank you for allowing me this opportunity to make a statement tonight. First off, I think
that an upzone and increased density in the Northgate Urban Core is an excellent idea and
I support this process. It is needed to increase housing in the transit corridor and to add
to the pedestrian orientation and walkability of our neighborhood. Density in urban cores
is clearly the right thing to do from an environmental perspective both in preventing
28-2 urban sprawl and in reducing dependence on cars. The linking of a rezone with
affordable housing is also an excellent goal. In this, I hope that the City can find a way to
make the incentive zoning work such that developers will include affordable housing in
their projects rather than paying a buy out and that we will retain and have a net gain of
affordable housing in the Northgate Urban Core. Affordable housing should be available
28-3 in dense, transit accessible areas where residents can more easily choose to live without
the additional expense of cars. I have four concerns: 1. Parcel E which lies outside the
Northgate Urban Core should be excluded from this analysis. We can revisit this at a
later date, perhaps as part of the upcoming neighborhood plan updates. 2. Transition
28-4 between the proposed area and the adjacent single family neighborhood along the north
edge of this proposed rezone should be stepped. Perhaps more creative zoning ideas such
as cottage housing could also be considered for these edge areas. 3. Neighbors in
Pinchurst would like to see the pedestrian-oriented transportation infrastructure addressed
before auto-oriented transportation infrastructure. In order to be a sustainable
28-5 community, we need safe ways to walk. We need to implement the Northgate
Coordinated Transportation Investment Plan, especially those projects near the areas that
would be upzoned. One of the first projects that needs to be implemented is the proposed
sustainable street design on NE 115th between 5th Ave NE and Roosevelt Way NE. 4.
28-6 While the areas that are currently being proposed for rezone are a great first step, there
are other areas of opportunity that are not included here that should also be considered for
rezone. The Northgate Mall has an enormous surface parking lot. Let's rezone that for
housing. Also, the business park south of the south lot is another wonderful opportunity
for high-rise housing and mixed use development. In ways, it is a much better location
for housing due to it's proximity to the potential light rail station site. Thank you so much
for your consideration.

Keep your kids safer online with Windows Live Family Safety.
http://www.windowslive.com/family_safety/overview.html?ocid=TXT_TAGLM_WL_R_efresh_family_safety_052008

Letter 28: Renee Staton

1. Your support for rezones to increase residential density, as well as improved pedestrian orientation and walkability, are noted.
2. Your preference for affordable housing provisions that will achieve affordable units in new projects in the Northgate Urban Center is noted. The City's incentive zoning program, which applies to upzones city-wide, allows affordable units to be provided on-site or off-site (through specific performance or payment of a fee for projects over 85' in height).
3. Sub-Area E was included in Alternative 1 but is excluded from Alternatives 2 and 3. The properties are located outside the designated Urban Center and are not considered appropriate for rezoning as part of this action.
4. Your preferences for "stepped" transition in zoning toward the northern single-family neighborhood, and ideas such as cottage housing near the edges, are noted. Final EIS Alternative 3 would maintain the existing low-rise multi-family zoning on nearly all boundaries of the study area. In many locations, a maximum height of 85 feet could be achieved on parcels adjacent to the Lowrise zones in the Urban Center through contract rezones.
5. Your preferences are noted. The sequence of improvements included in the Northgate CTIP is intended to implement a balance between roadway and pedestrian modes of travel. Actions described in this Final EIS include bonus provisions that could result in additional streetscape and pedestrian improvements.
6. Your suggestions to rezone the Northgate Mall and office properties further to the south for increased housing density are noted. These sites are not located within the study area evaluated for rezoning in this EIS.

Richard Truax
10752 Ashworth Ave. N.
Seattle, WA 98133
206-440-9752

6/8/08

To Whom It May Concern:

I am writing in response to the Northgate Legislative Rezone Environmental Impact Statement.

I attended the meeting hosted by DPD on May 28th at the Northgate Community Center. At the meeting two groups of people spoke. One group was commercial property owners/developers in the Northgate area. Each spoke about the same basic thing, height limits being moved to the maximum of 125 feet. The other group to speak, including myself, were residents of the Northgate area. This group also had a common theme to their concerns. This concern was not height limits but the disconnect between the vision of by the Mayor and DPD of Northgate as an "urban village" and the lack of investment on the part of the city to make this happen.

To quote a couple speakers, "the city has the cart in front of the horse". This plan to rezone contains no specific money or investment on the part of the City of Seattle. The city wants the developers to make improvements. The problem with this model is twofold. One, the city does not hold the developers to such improvements and the other being the larger needs of the greater neighborhood. These needs will require a plan and an investment on the part of the city as developers are not going to build sidewalks, bike trails and green space throughout the Northgate area.

To highlight the concerns of holding developers to high standards of development I point to Northgate North and the new remodel by Simon Properties of the Mall itself. I also highlight the incomplete work on 115th Street. North of the cemetery. Northgate North is a hideous eyesore of a building. In essence it is a block of concrete. Is this the type of development we can expect? As part of this building there were no provisions made for pedestrian traffic across Northgate way. The result is a game of dodge the pedestrian every day as scores of people jaywalk back and forth between the mall and Northgate north. This is a fatality waiting to happen. With the recent remodel and expansion of Northgate Mall, there were no pedestrian improvements made to remedy this situation.

Simon Properties just finished its remodel of the mall. While they did a lot to develop parking they did nothing and I highlight the word nothing to accommodate pedestrian and bicycle traffic. In addition, no money was spent improving the traffic flow on the streets surrounding the mall. The project did not include new bike racks, oops there is one new bike rack that will hold a couple bikes at the North Entrance. The parking garage has no covered spaces for bikes despite several hundred for cars. No new sidewalks in the neighborhood, no new green space, no new crosswalks. How does this build an urban village? It built an auto Mall which is not an "Urban Village".

Another example of a bad design and oversight is the project on 115th st. North of Washelli Cemetery. A couple summers ago the city rebuilt this road. It was a much needed and wonderful improvement as it included sidewalks. The problem is the project was never completed. The improvements stretch from Meridian Ave. to the East and then abruptly stop at about Interlake Ave. West. Sidewalk gives way to what was on 115th, a steep dirt bank covered in parked cars. Just 100 yards or so down the same road is a nice sidewalk going from Aurora Ave. east. Why were the two never connected? Why has this 100 yard stretch been left a mess? Aurora Ave. with the 358 Metro Bus is a major transit route. A person using the 358 should have a sidewalk to walk down while accessing the hospital and new medical building there. This is the image of an "urban village". Instead of a completed sidewalk we got a large parking garage. For this garage the hospital found the money to put on decorative brick on the side facing the hospital but a white wash paint job on the side facing the public. Is this the development our neighborhood can anticipate with your "urban village" model or will we see connected pedestrian and bicycle transportation routes?

The Northgate area, especially the area to the West and North of the mall does not have sidewalks. Not even busy Northgate way has a sidewalk West of Meridian. If we are to have an "Urban Village" the city needs to commit to building the infrastructure for such a village. This includes sidewalks for a minimum of a 1/2 mile radius around the Northgate rezone on all streets, as well as bike lanes in the same parameter. We also need green space, including some wild green space, to offset the higher density. This needs to begin now rather than after the density occurs. This project needs the support of the surrounding community. It was obvious from the speakers at the public meeting there is support for higher density but not without good planning and oversight from DPD as well as requisite improvements in infrastructure.

The city did make improvements along 5th Ave. East. This is a model of what needs to occur all around the neighborhood. There is an effort to convert the small North Park and Ride into a Park, an effort currently stalled for lack of money. This too is a small step. The problem is we have seen more problems and lack of action than we have improvements. When does the city begin to invest in the neighborhood on a level necessary to make an "urban village"? Without that investment, there will be no support from the neighborhood.

Thank you

Richard Truax
Seattle, WA
Northgate Resident.

Letter 29: Richard Truax

1. Your comments noting the need for City investments in infrastructure to serve the neighborhood are noted. Actions described in this Final EIS propose Northgate-specific bonus provisions that could result in additional streetscape and pedestrian improvements.
2. Your concerns about aesthetics and design quality are noted. The cited projects are not within the scope of this EIS.
3. Your concern with jaywalking across Northgate Way is noted. The CTIP includes several projects along Northgate Way that are intended to enhance pedestrian safety; please refer to the list of Northgate CTIP projects in Table 4-5 of the Draft EIS.
4. Please see the response to Comment No. 2 above.
5. Please see the response to Comment No. 2 above.
6. Your comments are noted. Please refer to the Northgate CTIP, which includes numerous projects to install or improve sidewalks throughout the Northgate area. Actions described in this Final EIS would also encourage improved pedestrian connections and streetscape amenities in the Urban Center. Please note that the Seattle Parks Department is proceeding with plans to develop Hubbard Homestead Park on the former park-and-ride lot; construction began in September 2009.

Kristian Kofoed - Northgate Alternatives

From: "Ruth" <ruthalice@comcast.net>
To: <kristian.kofoed@seattle.gov>
Date: 5/29/2008 6:02 PM
Subject: Northgate Alternatives

Hello Kristian,

I was at the meeting last night & spoke with you briefly afterward about parking issues. Like everyone else, I guess, I have a long list of concerns about what is about to happen to my neighborhood. Without further ado:

- 30-1 [1) There is already a lot of commercial vacancy in the NG area. Some locations have high turn-over rates as well. Adding more commercial will make this situation quite a lot worse, especially if the new stores are the same old chains already represented all over town. More square feet of retail work out to a smaller piece of the pie for each business. This will depress rent rates & result in lower quality tenants. **Therefore, we should go very slowly & thoughtfully in adding more commercial space.**
- 30-2 [2) Pedestrians & cyclists already feel like moving targets in an arcade game. We need better rights of way & protection for them, especially if we want to encourage people to leave their vehicles at home. **Dedicated paths would be wonderful.**
- 30-3 [3) Protecting homes from conversion to commercial use is paramount. **Residential areas must be buffered against the commercial ones by lower building heights & landscaping.**
- 30-4 [4) The increased traffic will be the first thing to upset residents, & for good reason. **Traffic circles, one-way streets, cul de sacs, or whatever else it takes should be used to mitigate traffic impacts in our sidewalk-free neighborhoods.**
- 30-5 [5) Because Northgate is going to become so much more densely built than before there needs to be a lot more open space than there is now. All developers should be paying into a mitigation fund that will help pay for the amenities the neighborhood needs, sort of like a prequel LID. **The core area & the surrounding neighborhoods are in critical need of more parks.** This is the one use that residential zoned land might be converted for. It states in the draft plan that there isn't much habitat in this area. That may be true, but there soon will be when Northgate Park is completed, and already there is a lot of it very close by at Thornton Creek Park Six.
- 30-6 [As to the alternatives offered, I think the focused rezone is best except that it allows for way too much commercial use at this time. Also, the way these plans are presented keeps all the focus on the plans themselves & none of it on the effects on the surrounding areas. Mitigation for the neighborhoods is part & parcel of the deal. To be fair, it all has to move together.

Sincerely,

Ruth Williams

1219 NE 107th St.

file:///C:/WINDOWS/Temp/XPgrpwise/483EEFB7DOM13P130510016273761424DE1\G... 5/30/2008

Letter 30: Ruth Williams

1. Your comment is noted. It is assumed that redevelopment of individual parcels and uses would occur when property owners consider market conditions to be conducive to leasing.
2. Your preference for improved pedestrian and bicycle routes and safe conditions is noted. The Northgate CTIP includes a comprehensive program of improvements, many of which would address pedestrian and bicycle needs. In addition, the Bicycle Master Plan and Pedestrian Master Plan that have been drafted by the Seattle Department of Transportation also provide for improvements in these areas. Actions described in Chapter 2 of this FEIS also include bonus provisions that could result in additional streetscape, pedestrian and bicycle improvements.
3. Your preferences to avoid conversion of homes to commercial use, and your preference for transitions in zoned building height limits near residential areas and increased landscaping, are noted.
4. Please refer to the traffic and pedestrian improvements that are included in the Northgate CTIP.
5. Actions under any rezone alternative are proposed to include revisions to the Northgate Overlay District that would establish an open space fund, adopt streetscape plans for “green streets”, and establish bonus provisions to encourage a range of streetscape improvements.
6. Your preference for the Focused Rezone (Alternative 2) is noted.

From: Danielle Yi <danyeliyjm@yahoo.com>
To: <kristian.kofoed@seattle.gov>, <paul.fischburg@seattle.gov>
Date: 6/10/2008 9:24 AM
Subject: northgate rezone comments

Kristian and Paul,

I am a resident of the Northgate area. Here are my comments and concerns regarding the proposed Northgate rezone / upzone;

31-1 -If the rezone is approved, flooding may occur as a result of trees and grassy areas being replaced by concrete (especially in the area of Northgate that was once swamp land), so the drainage system will need to be improved in the Northgate area.

-Since traffic and pedestrian improvements promised from the last rezone have not been kept, the following are pedestrian safety and traffic calming measures that need to be in place before another rezone should be considered. If Mayor Nickels and city leaders want Seattle to be environmentally and pedestrian friendly, like they claim, these measure should be put in place before another rezone / upzone is considered:

31-2 -Light rail stops in northgate
-parking garages, especially on the business properties that will be redeveloped
-pedestrian bridges and/or more crosswalks across NE 103rd, 5th Ave NE and Northgate Way
-sidewalks in the residential areas east, south and north of the mall as there will be increased traffic in the neighborhoods as a result of many more businesses and residences in northgate.
-Northgate Way, NE 103rd, 5th Ave NE and 1st Ave NE streets need to be widened to prevent another Mercer mess.
-The off-ramps and on-ramps from I-5 to Northgate Way, Corliss Ave., Northgate way, 5th ave NE and 1st Ave NE will need to be expanded to handle the increased traffic volumes as most of the people who work in this area at the retail shops, offices and restaurants will not be able to afford to live in this area.
-bike paths
-more bus stops and routes in the Northgate area

31-3 -Because retail and mid to high rises keep encroaching on residential areas the zoning loopholes that allow residential zones to become business zones (such as the Safeway in Pinehurst) need to be closed so the residential zones in the northgate neighborhood aren't upzoned/rezoned as well and our neighborhoods aren't developed into oblivion.

31-4 -Finally, residents in the Maple leaf, Pinehurst, haller lake, victory heights and licton springs neighborhoods should be surveyed to get a true sense of residents' opinions as it seems very few people who live in the affected areas are aware of the possible rezone.

Thanks for your time,

Danielle Yi

Letter 31: Danielle Yi

1. Your concerns about flooding impacts due to impervious surfaces, and the corresponding need to improve the drainage system in Northgate, are noted. This type of impact was discussed in Sections 4.7 and 4.8 in Chapter 4 of the DEIS. Please refer to the responses to comments in Letter #1 for additional discussion of stormwater impacts. Future development requires installation of improved drainage systems that would help avoid or minimize the potential for flooding impacts.
2. Your comment is noted. Many of these types of improvements are included in the Northgate CTIP. Actions described in Chapter 2 of this Final EIS would also encourage provision of various streetscape improvements.
3. Your objection to allowing rezones of residential land to commercial zones and subsequent encroachment of development in residential areas is noted. Note that Alternative 3, described in Section 2.5 of the Final EIS, excludes from rezones nearly all multi-family areas adjacent to single family zones at the edges of the study area.
4. Your request for a survey of residents' opinions in surrounding neighborhoods is noted. This comment does not relate to an environmental issue addressed in the EIS. The City has used a variety of methods to inform residents of the potential rezones in the Urban Center; please refer to the Northgate Revitalization page of DPD's website.

Joan Zegree
1210-F East Shelby Street
Seattle, Washington 98102
206-324-6527
zegreej@comcast.net

June 14, 2008

Kristian Kofoed
kristian.kofoed@seattle.gov
City of Seattle Department of Planning and Development
P.O. Box 34019, 700 Fifth Avenue, Suite 2000
Seattle, WA 98124-4019

RE: Northgate Legislative Rezone Draft EIS & 11312 5th Avenue NE

Dear Mr. Kofoed:

I am thrilled that the city is looking at Northgate for creative design and zoning decisions that will bring beauty and vibrancy to our long-neglected neighborhood! Thank you for your efforts.

I purchased this referenced property on July 26, 1985, zoned L-3, with the long-term plan to develop a multiple family three-story building compliant with L-3 code. I even had preliminary drawings of possible configurations. I learned in March 1992 that the property mysteriously had been down-zoned to L-1. I never received notice of hearings or such action and was shocked to learn it was no longer L-3, significantly diminishing the value of my investment. Had I been aware that a down-zone to L-1 was under consideration, I certainly would have made my voice heard.

Attached photos show the overbearing structures zoned primarily L-4, L-3 and a tiny area of L-2 that surround my property on this dead-end, graveled, no-sidewalk street one block north of Northgate Way. Photos "Brick Shadow," "Looming Brick," and "Down Street facing 11312," show the brick apartment building looming over 11312 5th NE (a peek of its white garage door is visible). The two other photos show the character of the dead-end street where it joins 5th NE and is surrounded by large commercial and multifamily structures (L-4, L-3) that will increase in height and volume with either of the proposed rezones.

I support in principle Broad Rezone Alternative 1, with the caveat that this dead-end street off 5th NE and my property at 11312 5th NE be returned to L-3. This makes sense given the "cave" it is in now, surrounded by looming L-4, L-3, L-2 structures which will simply grow if a Northgate development plan is set into motion.

Respectfully,


Joan Zegree
Enclosures

32-1



11312 5th Ave. NE.
Brick shadow looming over property



11312 5th Ave NE
Looming brick.
My property roof.



11312 5th Ave NE.
Down street toward house.



11312 5th NE
"Target View" Looking out from Dead End



11312 5th NE.
Looking from house toward 5th NE.

Letter 32: Joan Zegree

1. Your preference to see Lowrise 3 zoning rather than Lowrise 1 zoning at this location in the northwest corner of subarea D is noted. This property's vicinity is a one-block dead-end street accessed from 5th Avenue NE near Hubbard Homestead Park. It is located directly at the northern edge of the study area with Single-Family zoned property adjacent to the north. The Alternative 1-A - Broad Rezone and Final EIS Alternative 3 would include this as a Lowrise 2 zone, while the Alternative 2 - Focused Rezone omits this area but rezones property just to the south as Midrise.

NORTHGATE REVITALIZATION
ZONING PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT
PUBLIC COMMENT MEETING

May 28, 2009
7:00 P.M.
Northgate Community Center
10510 Fifth Avenue Northeast
Seattle, Washington

Catherine A. Decker, Court Reporter
CCR 1973

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3 For City of Seattle Department of Planning and Development:	
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5 Land Use Section	
6 P.O. Box 34019	
7 Seattle, Washington 98124-4019	
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9 For Weinman Consulting, LLC:	
10 RICHARD WEINMAN	
11 9350 SE 68th Street	
12 Mercer Island, Washington 98040	
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26 Court Reporter:	
27 CATHERINE A. DECKER	
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29 100 South King Street, Suite 360	
30 Seattle, Washington 98104	
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STATEMENT OF CAROL CARNAHAN

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Hi. My name is Carol Carnahan. I live at 11535 Corliass North. I lived here before Northgate was here. Went away for a long time but now I'm back living in the family home here. And I'd like to say it's nicer here now. It's diverse and rich. I've lived in urban villages in two other states, and the quality of life was very nice.

33-1

But I see an important component missing in the proposal, and that's -- it seems to me if it's going to be an urban village where the goal, as was stated in the document that I read in the library, is that you can walk to work and play, going about your daily routine -- I don't see walking and biking paths that are separate from the transportation corridors. What I'd like to see is a perimeter walking, biking path and a few inroads into the center. I think walking here is not enjoyable because the traffic is so bad and so noisy, but it could have the potential to be a true urban village with that facility added.

MR. WEINEMAN: Thank you.

STATEMENT OF MARY MILLS

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My name is Mary Mills and I live at 11528 Roosevelt Way Northeast. My concern focuses mainly on Section D. I'm more comfortable with, I believe it's, Alternative 2, the focused rezone. And my comment is with regard to Alternative 1. What I'm seeing at the north edge of Section D is a huge height difference between what's proposed and the residences in the immediate area. I don't know enough about the other areas to know if there is a more staggered effect down to where the houses comes in, how that impacts that. But there are houses across the street from areas that are already zoned at about 60 feet and aren't even built up to their potential yet. So we currently have the potential to grow a great deal without rezoning that area. And then if it went all the way up to 85 feet, that that could have a tremendous negative impact on the homes and the life and just the area in that section.

34-1

MR. WEINEMAN: Thank you.

STATEMENT OF RENEE STATON

My name is Renee Staton. My address is 12516 12th Avenue Northeast. I live in the Pinehurst neighborhood. And I want to thank you for the opportunity to make a statement tonight.

First of all, I want to say that I think an upzone and increased density in the Northgate urban corridor is an excellent idea and I fully support the process. It's needed to increase housing in the transit corridor and to add to the pedestrian orientation and the walkability of our neighborhood. Density in urban corridors is clearly the right thing to do from an environmental perspective, both preventing urban sprawl and reducing dependence on cars. The linking of a reason for affordable housing is also an excellent goal. In this I hope that the city can find a way to make the rezoning work such that developers will include affordable housing in their projects rather than paying a buyout, and that we will retain and have a net gain in affordable housing in the Northgate urban corridor.

There is a lot of de facto affordable housing right now, and I hope that at the end of the day we still have at least that much if not more affordable

35-1

35-2

housing. I think affordable housing should be available in dense, transit-accessible areas where residents can more easily choose to live without the additional expense of cars.

And I have four concerns. One is perks utilized outside the urban corridor, and it should be excluded from this analysis. We can revisit this at a later date, perhaps as part of the upcoming neighborhood plan updates. The transition between the proposed rezone area that you were talking about and the adjacent single-family neighborhood along the north edge of the proposed rezone should be stepped, and perhaps a more creative zoning idea, such as cottage housing, could be considered for those transitional zones.

Neighbors in Pinehurst would really like to see pedestrian-oriented transportation infrastructure addressed before auto-oriented transportation infrastructure. In order to be a sustainable community, we need safe ways to walk. We don't have sidewalks and we have a lot of traffic right now. We need to implement the Northgate Coordinated Transportation Investment Plan, especially those projects near the areas that will be upzoned. One particular project that Pinehurst feels very strongly about is at Northeast 115th between 5th Avenue

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1 Northeast and Pinehurst Way Northeast. We have a
 2 35-5 design already and we'd like to see it implemented.
 3 It's a sustainable street design.

4 And then one final thing is that while the areas
 5 that were currently being proposed are a great first
 6 step, there are other areas of opportunity that are not
 7 included here and that should be considered for rezone.
 8 35-6 The Northgate Mall has an enormous surface parking lot.
 9 Let's rezone that for housing. Also the business park
 10 south of the south lot is another wonderful opportunity
 11 for high-rise housing and mixed-use development. In
 12 ways it's a much better location for housing due to its
 13 proximity to the potential light rail station site.

14 Thank you so much for your consideration.

15 MR. WEINMAN: Thank you.

16
 17 STATEMENT OF COLLEEN MILLS

18
 19 Hi, I'm Colleen Mills and I work for Mullaly
 20 Development and am also on the Stakeholders Group and
 21 representing multiple family. So we're looking at site
 22 36-1 B, the Northgate Apartments. The site has basically,
 23 as most people who live around here know, reached its
 24 economic life. We are supporting broad rezone, and
 25 John Mullaly will talk about that in more detail. We

1 think because of where the site is located, it's been
 2 called the gateway, the core site. It's a unique
 3 opportunity for the city to benefit from also the
 4 redevelopment.

5 We would like to see a commercial zone to make it
 6 so that we'd have retail fronting the street. We would
 7 also have housing, and with its proximity to the mall,
 8 the light rail station, and possibly a light rail just
 9 a pickup station or a drop-off station. It's also been
 10 36-1 talked about possibly being put on First Northeast in
 11 front of the site. We've ^{owned the site} ~~only~~ owned for many, many
 12 years, and it's become now very, very costly to operate
 13 because of the age of the buildings and the heating
 14 system. So we definitely would like to see the area
 15 rezoned and rezoned for commercial needs. And the city
 16 would also receive many benefits from having the site
 17 developed from a larger tax base, more jobs in the
 18 area, and also reaching its vision for an urban center.

19 MR. WEINMAN: Thank you.

20
 21 STATEMENT OF SUE GEVING

22
 23 I'm Sue Geving. I live at 316 Northeast 115th.
 24 37-1 If you can visualize that we are right on the edge of
 25 the planning area, 115th is zoned 7200. So we have

1 single family homes with big yards, and this proposal
 2 is putting L4 right up against it; and yes, we are
 3 concerned. Just to set the record straight, our street
 4 that has been cul de sac'd -- thank God -- but it
 5 wasn't just because Target moved in. The light there
 6 had been offset previously, and when they moved that
 7 street light directly into that street, that was more
 8 of an impact actually than the building was. So the
 9 reason they cul de sac'd it was because, yes, it was in
 10 the plan, but everyone knew then when they moved that
 11 in line with the street. We had already been getting
 12 tons of cars, that would just have -- just to set it
 13 straight, that was the thing was the light.

37-1

14 I have a lot of concern about neighborhood
 15 commercial creeping farther north. I'm fine with it on
 16 Northgate Way and Fifth. That's an arterial. Third
 17 Avenue is a designated green street, it's part of the
 18 park circulation and had been all along in our comp
 19 plan. Had the park, had a nice green street where
 20 people could walk and still rest and be peaceful. And
 21 I'd like to see that maintained. I don't think anybody
 22 ever really had thoughts of -- and I think we all know,
 23 that live in the neighborhood, that the back side of
 24 the Northgate North building has just been empty. I
 25 mean, that there is -- you all know, right? that there

37-2

1 is a little space there on Fifth Avenue that's never
 2 been rented. So I mean there's nothing there that
 3 would suggest that commercial would thrive to the north
 4 of that. And that is one of my bigger concerns, you
 5 know, just keep commercial back on the arterials where
 6 it belongs.

37-2

7 MR. WEINMAN: Thank you.

8
 9 STATEMENT OF GAIL GAUTESTAD

10
 11 Hi. My name is Gail Gautestad, G-A-U-T-E-S-T-A-D,
 12 and I'm at 2117 North 107th in a condominium. We're
 13 pretty much on the far west side of this project. And
 14 under two of those plans it doesn't look like we would
 15 be as heavily affected as some of the others. But
 16 because we're on North 107th, we're right on the south
 17 side of where the development would be. We have
 18 concerns about what the height might be if it's changed
 19 on the commercial buildings that exist to the north of
 20 107th.

38-1

21 Currently -- my main concerns overall on this are
 22 traffic and parking. We currently are on a small strip
 23 of road between Meridian and Corliss. Westbound
 24 traffic comes up Meridian and speeds along there to get
 25 on I-5, and eastbound traffic comes from Northgate Way

38-2

1 or off of I-5 southbound to get to North Seattle
 2 Community College. So we already have a very high
 3 38-2 traffic area there, and I would hate to see that there
 4 would be more congestion in that area without improving
 5 that roadway.

6 On a personal note, if you have any influence with
 7 Metro, I could possibly get out of my single-occupancy
 8 vehicle if I could walk to the transit station and take
 9 38-3 an express bus to the University of Washington.
 10 Hundreds of people go to the U.W. every day from
 11 Northgate, and the four-mile trip takes about 45
 12 minutes.

13 And another issue that's prevalent around the city
 14 is homelessness, and that is in walking from where I
 15 live under the overpass of the freeway, there are a
 16 38-4 number of people who live there. And so during the
 17 winter months that might not be as comfortable as I
 18 would like. Thank you.

19
 20 STATEMENT OF SHAIZA DANJI

21
 22 My name is Shaiza Danji, and my family owns the
 23 property to the west of I-5, which is more commonly
 24 referred to as the Hotel Nexus and the restaurant,
 25 formerly known as the Berkshire Grill, soon to be

1 reopened as the Saffron Grill. So it's 2140 North
 2 Northgate Way. Our property is in part of study area A
 3 in the draft EIS, and we're an integral part of the
 4 Northgate urban center.

5 I would like to commend the City of Seattle for
 6 taking the initiative to consider the upzoning of
 7 Northgate Way and other relevant properties in the
 8 Northgate urban center and also wish to thank the city
 9 for its tremendous support of the Northgate
 10 Stakeholders Group since 2003. The Stakeholders Group
 11 39-1 has been able to address large lot development in the
 12 Northgate urban center through consensus building and
 13 also developed the coordinated transportation
 14 investment plan known as CTIP. I have served on the
 15 Northgate Stakeholders Group since its inception and
 16 was particularly involved in the CTIP subcommittee.

17 My understanding from the draft EIS is that the
 18 objective of the upzone is to ensure that first the
 19 recent momentum from the Stakeholders Group is
 20 39-2 sustained, second, that growth can be accommodated, and
 21 third, that the Northgate area comprehensive plan's
 22 goal to transform an automobile-oriented landscape to a
 23 pedestrian-friendly destination with densities to
 24 support transit is achieved.

25 And underlying my comments tonight is the critical

1 these that we want people to live, work, shop, and take
 2 39-2 public transit from Northgate, not just drive to
 3 Northgate to park and take transit downtown.

4 With all of this in mind, I have two major points
 5 this evening. First of all, the focused rezone
 6 contemplated by the draft EIS should be rejected as it
 7 really does not make sense with respect to the west
 8 side of the freeway. It treats the west side of the
 9 freeway differently from the east side of the freeway,
 10 and it's not really clear why. The draft EIS itself
 11 explicitly concludes in Section 1.7 that there is no
 12 significant difference between the delayed conditions
 13 at the intersection of Meridian and North Northgate Way
 14 under any of the alternatives when compared to the no-
 15 39-3 action alternative.

16 In fact, the draft EIS states that there is a
 17 possibility that average delays at this intersection
 18 could actually decrease to some degree under the broad
 19 rezone. If this is the case, why treat the west side
 20 of the freeway differently? I remind all of you that
 21 the CTIP does contemplate several initiatives on
 22 Northgate Way west of the freeway to mitigate traffic
 23 and improve pedestrian connectivity. In particular, I
 24 would encourage you all to look at CTIP item C-12 which
 25 would improve the pedestrian connection under Northgate

1 Way from both the design and pedestrian safety
 2 perspective. And this actually addresses the point
 3 that was made by the previous speaker. This item is
 4 slated as a near-term item.

5 39-3 If we create a more pedestrian-friendly
 6 environment, we will have more pedestrians. It is
 7 crucial that the west side of the freeway be considered
 8 part of the Northgate urban center, not only in name
 9 but in action. And the focused rezone explicitly does
 10 not do this.

11 My second point is to encourage the city to
 12 seriously consider the advice of the Stakeholders Group
 13 from April of 2007 to seriously consider heights of up
 14 to 125 feet in additional properties along Northgate
 15 Way. It is difficult for us really to imagine
 16 Northgate as an urban center, but it really will
 17 happen, particularly with the advent of rapid transit.
 18 39-4 With rising gas prices, we have all seen how nationwide
 19 and specifically in our area people are reconsidering
 20 their driving habits. It would be unfortunate if the
 21 city does not really seize this opportunity that it has
 22 itself offered to reconceptualize Northgate as a true
 23 urban center while maintaining its unique single-family
 24 neighborhood characteristics outside the core.

25 The city should seriously consider heights up to

1 125 feet along Northgate Way. I will use our property
 2 as an example. We have owned the property for over 32
 3 years and are very committed to Northgate in the long
 4 term. Our thinking for the property is long term and
 5 will require substantial thought and consideration in
 6 working with the city and the community. We are
 7 currently zoned neighborhood commercial up to 65 feet.
 8 so we're already a commercial zone. But the property
 9 across the street from us is zoned 85 feet.

10 Under the no-action option and the focused rezone
 11 option, there would be no redevelopment of our site and
 12 certainly no residential development on our site.

13 39-4 Under the broad rezone, the property would go to 85
 14 feet, which might theoretically allow redevelopment,
 15 but such redevelopment may be suboptimal, particularly
 16 in the urban center context as well as potentially cost
 17 prohibitive.

18 If the property are rezoned to 125 feet, we could
 19 maximize the potential of the site in a mixed-use
 20 development with a blend of uses that could include
 21 hotel, residential, and other attractive uses. At
 22 present there is no residential opportunity on our
 23 site, and the best way to encourage residential
 24 multi-family development in a mixed-use context would
 25 be to allow for 125 feet. This redevelopment really

1 makes sense in the context of light rail coming to
 2 Northgate.

3 As stated by the draft EIS and earlier this
 4 39-4 evening, any property that takes advantage of the new
 5 upzoning would remain subject to project-level SEPA, so
 6 of course there would be all the considerations in the
 7 Design guidelines and such that would be required. I
 8 would strongly encourage all of us to support the city
 9 in considering upzones to the Northgate urban center as
 10 contemplated in the broad rezone rather than the
 11 focused rezone, and in addition to consider zoning of
 12 39-5 up to 125 feet on Northgate Way. We want people living
 13 and working in the Northgate area, not just driving to
 14 Northgate, parking, and then taking the transit. A
 15 proposal that does not seriously increase density will
 16 result in just that. Thank you.

17
 18 STATEMENT OF RICHARD TRUAX
 19

20 Richard Truax. I live at 10753 Ashworth Avenue
 21 North, just west of the freeway, in the previous
 22 speaker's property. I would say I have a concern about
 23 40-1 height limits, but that's not why I'm up here.

24 My biggest concern is to parrot what a lot of
 25 people have said about pedestrian traffic, the ability

1 to move. The neighborhood was originally designed in
 2 such a way that we weren't -- it was supposed to
 3 somehow or other have a rural character, and as a
 4 result there are basically no sidewalks, particularly
 5 north, so you cannot walk north of the general area
 6 without basically dodging traffic. The few sidewalks
 7 that are in the neighborhood tend to be on the street,
 8 so they are curb-side sidewalks, and when you're
 9 walking you're about two feet away from buzzing traffic
 10 rather than being removed from the traffic. And it's
 11 an issue that has to be addressed, otherwise the
 12 purpose of all this is meaningless.

13 The centerpiece of this project is a giant mall
 14 that's predicated on cars, and we have to find a way to
 15 make it so that bicycles, be it bike lanes, pedestrians
 16 and not just in the redevelopment zone. It has to
 17 finger out into the neighborhoods, because the
 18 neighborhoods have no sidewalks.

19 I'm also concerned on the city's, I would say,
 20 general requirements that there's proper development.
 21 Northgate north to me is a classic example of no
 22 planning for pedestrian traffic. It's basically dodge
 23 ball of pedestrians flying all over the place, and so
 24 there's no accommodation made for people moving back
 25 and forth between Northgate Mall. And the building

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1 itself is an eyesore. And so we have, what, a three or
 2 four-story building that's an eyesore, so the idea of
 3 having a 125 foot eyesore is of course a concern.

4 The city has not done a good job planning
 5 pedestrians, like with 115th Street. When it remodeled
 6 that street two or three years ago, it did a very nice
 7 job and then for some reason stopped a hundred yards
 8 short of Aurora in connecting to another sidewalk. So
 9 a person getting off the 358 bus and trying to walk to
 10 the hospital starts on a sidewalk, leaves the sidewalk
 11 and goes to a chaos of cars, dirt, and mud, and then
 12 all of a sudden comes back to this beautiful sidewalk
 13 leading them to the hospital. I have no idea why that
 14 stopped. And so I have concerns about Northgate north
 15 and that sort of model of development, so it is
 16 critical.

17 One last one. We just also expanded this mall and
 18 provided basically no bike parking. There's no covered
 19 parking in the parking garage -- there's one tiny
 20 little rack to hold about three bikes. I'm sure you
 21 have the number of parking stalls and the number of
 22 covered parking stalls. And we have to get beyond the
 23 idea that this is a car neighborhood if we're going to
 24 promote pedestrian intensity. Thank you.

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STATEMENT OF GREG HUNTER

1
2
3 I'm Greg Hunter, 11720 24th Avenue Northeast. I'm
4 in favor of the broad rezone because eventually I would
5 like the Northgate area to look better than it does
6 now. And there's a lot of properties in here that do
7 not change because there's no incentive for them to
8 change. If the zoning all goes up one notch, that will
9 spur something to happen on a lot of the pieces of
10 property that have just been stagnated for years and
11 years. If everybody were to build to the max, if you
12 went on a broad rezone, it would still take years and
13 years to happen because you're going to get one land
14 owner that will build something nice, that will spur
15 the imagination of someone else, they'll build
16 something, somebody else will want to build something.
17 But it will take a year or two to get the plans and the
18 permits and everything.

19 So it's not something that's going to happen
20 overnight anyhow. And if it does take 10 or 15 years
21 for it to happen, let's at least get it started now.
22 Thank you.

41-1

STATEMENT OF JOHN MULLALLY

1
2
3 My name is John Mullaly. I'm at 2825 Eastlake
4 Avenue East, Seattle, Washington. I represent
5 Northgate Apartments located at First Avenue Northeast
6 and Northgate Way. We support the principle of the
7 broad rezone, yet we have a few caveats to the zoning
8 changes in regards to our property. Our site as
9 proposed in the broad rezone has split zones with an NC
10 125 zone along the freeway, an NC 85 in the southeast
11 corner, and mid-rise #5 in the northeast sector. We
12 oppose strongly having mid-rise 85 mixed in with an NC
13 zone. There are conflicts and inconsistencies between
14 the two zones, such as setbacks and types of retail and
15 commercial uses. Rather than have a cohesive
16 development or village you would have a site not in
17 sync with itself.

18 From a planning and function perspective, it
19 requires a uniform zoning type. NC 3 designation
20 allows for flexibility and retail uses, allows for
21 housing, and brings your buildings to the street for a
22 vibrant streetscape, which is part of the Northgate
23 comp plan vision. In order to achieve the vision of an
24 urban village with multiple uses, including housing so
25 people can live, work, and play all at one location, we

42-1

1 need an NC 3 designation over the whole site. MR would
 2 segregate, not incorporate, the housing into the
 3 overall site plan. Northgate Apartments is a gateway
 4 site with its proximity to I-5, and a potential of a
 5 light rail stop near First Avenue Northeast. Allowing
 6 an NC 3-125 designation would make it potentially
 7 feasible to incorporation of the station to incorporate
 8 into one of our new buildings.

9 Think of the possibilities to be able to live at
 10 Northgate's gateway property and be able to ride the
 11 rail down to the U. District, all the way to the
 12 airport or to downtown. Northgate needs to be linked
 13 to the core of the city as well as service to
 14 surrounding neighborhoods.

15 Urban planning studies attest to the fact that
 16 there is safety in numbers. More people in the park,
 17 on the street, or in the shops create an atmosphere
 18 where people feel safer to stroll day and night. By
 19 bringing more density we create the pedestrian vision
 20 of European cities with sidewalk bistros and
 21 storefronts, and the buzz and bustle of a market
 22 village. Density is the key to achieving the vision of
 23 the Northgate urban village.

24 The no-action plan suggests that there is enough
 25 zone capacity currently to accommodate the

1 comprehensive planned growth targets. But theoretical
 2 capacity does not always translate into feasible or
 3 likely. Northgate needs a rezoning stimulus to ensure
 4 the city's and the regional growth targets are met and
 5 help then to prevent urban sprawl. The city has had
 6 the foresight to move forward on Northgate, and much
 7 has happened over the last three years. As the economy
 8 has slowed, we are in a fragile time, and the momentum
 9 to continue and to complete the vision is at risk.

10 I commend your courage and your vision for
 11 bringing the rezoning process to the table, but I ask if
 12 we do not act now, then when? If not here, then where?
 13 And to that end, where will our kids, our grandkids,
 14 and their kids live, work, and play? Thank you.

15 STATEMENT OF MELODY MCCUTCHEON

16
 17
 18 Good evening. My name is Melody McCutcheon, and
 19 I'm chair of the Chamber of Commerce Land Use
 20 Committee. I'm always a Mapleleaf resident.

21 There's three points I wanted to make to you
 22 tonight. The chamber strongly supports the broad
 23 rezoning, Alternative 1, for some of the reasons
 24 Mr. Mullaly just mentioned. This is a key opportunity
 25 to add density near a regional shopping center, near a

1 regional transit center, and help the city meet its
 2 43-1 goals and help meet regional Growth Management Act
 3 goals.

4 Number two, there are concerns that the chamber
 5 has that we're on record about on the incentive zoning
 6 proposal. Our deepest concern is that it will actually
 7 be a disincentive. So we strongly urge that the
 8 incentive zoning proposal only apply above 85 feet, so
 9 whether it's housing or the public benefit, only above
 10 43-2 85 feet, not below. There's just simply too few units
 11 that you can get if you go from 60 or 65 feet to 85
 12 feet to make that worthwhile with then a surplus, a
 13 surcharge on top for incentive zoning. The real
 14 concern is it's a disincentive and we're not going to
 15 see the positive benefits of density that the EIS talks
 16 about.

17 Third, we were a little disappointed that the
 18 EIS punted to the final EIS the issue of reducing
 19 greenhouse gas emissions. There's been some really
 20 good work done around the country in EISs of how you
 21 43-3 can examine how choosing one land use pattern over
 22 another can directly reduce greenhouse gas emissions by
 23 affecting vehicle miles traveled. So we would urge you
 24 in the final EIS to take a look at these alternatives
 25 and say, Where do we have opportunities to reduce

1 vehicle miles, to reduce greenhouse gas emissions, and
 2 make that part of your final EIS analysis. That'd be
 3 43-3 in keeping with the initiative of this city as shown
 4 nationally recognized to be a leader in that area, and
 5 the Northgate EIS has a chance to advance that cause
 6 even more. So thank you.

7 STATEMENT OF GRACE KIM

8
 9
 10 My name is Grace Kim and I live at 1720 12th
 11 Avenue, but I'm here working with the property owners
 12 that own the property just north of the proposed park.
 13 So I'm familiar with that area and I'm speaking about
 14 parcel C, specifically.

15 I know that we're not talking about the park, but
 16 to address somebody's prior concern about retail in
 17 that district, I would -- as the park is moving
 18 forward, it's already happening. But because it's
 19 44-1 moving forward in that way, if you look at the
 20 drawings, the first one on the right, it shows the
 21 difference in height from the 85 feet and the lower
 22 height limits. And I would encourage the creation of
 23 an urban park. If you've been down to Portland,
 24 there's some great urban parks there, and they are very
 25 successful from the standpoint that there's an urban

1 edge that reinforces that park. And I think if we're
 2 looking at a focused rezone or a zoning situation where
 3 there's a lower density, that urban park is not
 4 captured and therefore it won't become the vibrant
 5 place that it can be.

6 And once it becomes that vibrant urban park, there
 7 will be retail support there. I think right now the
 8 park 'n ride can't support any retail, but I think in
 9 the future if there's a park there, coffee shops,
 10 places that provide picnic supplies, kites, pet stores,
 11 things like that that would support the activities of a
 12 park, those types of retail spaces would be a great
 13 amenity around that park. And I think peoples'
 14 concerns about traffic racing through there, the
 15 increase of people and activities will produce a
 16 traffic-calming effect, in that if you look at places
 17 like Pike Place Market, not that that's what this is
 18 going to become, but I think that when you look at
 19 places like that, you don't see traffic racing through
 20 there. There's too many people, and too much activity,
 21 and too many things to see to actually create the
 22 traffic sort of running through those quarters.

23 The other thing that I would like to ask that the
 24 final EIS address is the notion of water quality. I
 25 know, having worked on a project in the south sound

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1 area, a previous proposal, I know the neighborhood, or
 2 the surrounding neighborhoods, are very concerned about
 3 water quality; and I think that it hasn't been
 4 addressed fully in the draft EIS. If you look at the
 5 aerial photo of the area, there's a lot of parking lots
 6 and single-story buildings that occupy these properties
 7 that are being discussed for rezone, and those
 8 properties currently are not mentioned -- their storm
 9 water, it just goes into the system. And I think with
 10 all the new development that occurs, there will be
 11 storm management mitigations that the individual
 12 properties will have to do as well as open space and
 13 green space which will allow the water to infiltrate
 14 into the ground and then be absorbed into the
 15 atmosphere as opposed to having to go through storm
 16 water treatment. So I'd like to see that addressed in
 17 the final EIS.

18
 19 STATEMENT OF KEVIN WALLACE

20
 21 Good evening. I'll stand up here so you don't
 22 have to look at my backside. My name is Kevin Wallace
 23 and I'm the developer of the 507 Northgate project up
 24 here on the corner on Fifth and Northgate Way.

25 And I just wanted to start by applauding the city

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1 and all the representatives of Northgate for the
 2 efforts that they've made so far, because without the
 3 infrastructure that's gone in, like this community
 4 45-1 center and the Thornton Creek project, my project
 5 wouldn't have been possible. And what we see is I
 6 think the first waive of the future of Northgate, the
 7 ability to develop quality mixed-use projects.

8 We talked about wider sidewalks here. Our
 9 sidewalks will be between 20 and 25 feet wide around
 10 the building. And this is what needs to happen at the
 11 other properties around the mall and in these areas in
 12 order to develop the public amenities, the pedestrian
 13 atmosphere that the leaders of this community have
 14 wanted and strove to create for decades.

15 In order for that to happen, the density or the
 16 45-2 height limit, the NC 3 zoning that is going to be
 17 provided needs to be higher than NC 3-85. Under the
 18 current building code, the maximum you can build in
 19 wood frame is 70 feet; and beyond that you would have
 20 to switch to a much more expansive steel or concrete
 21 construction method, which would require you to build
 22 much higher. So 85 feet would never pencil out as a
 23 development. What will happen then is everybody would
 24 either not develop their property or continue just to
 25 develop to the 65 or 70 foot height. If there's an

1 incentive zone on top of that to get to 70 feet from
 2 the 65, it's just a foregone conclusion that you're
 3 going to develop it to 65 feet again or not develop it
 4 at all.

5 With the NC 3-125 designation, the floor area
 6 ratio of the site is the same as the NC 3-85, which
 7 means that the number of square feet of building site
 8 you can build is the same. It only means 125 gives the
 9 owner the opportunity to develop a taller, skinnier
 10 building, creating more open space at the ground level,
 11 and it'd also create more modulation around the ring,
 12 45-2 around the mall and the development area.

13 So to sum up, my feeling is that the NC 3-85
 14 designation is not getting us anywhere. It won't
 15 provide any additional affordable units or units at
 16 all. And the 125 has the potential to increase the
 17 number of units delivered and also provide some better
 18 architectural look to the neighborhood and potentially
 19 with the incentive zoning, if that gets in place, some
 20 additional environmental and other neighborhood
 21 amenities.

22 So I would encourage everyone to take another look
 23 at increasing the zoning designation to 125 throughout
 24 the properties along Northgate Way. Thank you.
 25

STATEMENT OF SY IFFERT

My name's Sy Iffert. I-F-F-E-R-T, and my family, Jenna Justin Meyers and Theresa Andrew Dahl. We've owned property in the Northgate area now for over 40 years. It's family inventory. And you know, we're in the 21st century and we need to get into the 21st century. And I support the Alternate 1 to get us in the 21st century. If we don't, development north of us will develop, and we'll be in the same position we've been in for the last 40 years. And for that reason we should get in the 21st century. And I propose that the height restrictions be amended to the new Alternate 1.

I'm building a building now up in the D section, and when I -- I'm just a small builder. And when I have the hardships that a small builder has -- I've got setbacks. If I have 65 feet in the building I'm building today, I'd be building a building that I'm proud of, that the neighbors would be proud of. The neighbors would use it. I'm building here because I'm not going to use it. The community is going to use it. With the extra heights of affordable housing, we do need affordable housing, and that would give it to us. I'm building a box now that's a nice building, but it's not the building that I'd be proud of. It's not the

46-1

building that the community would be as proud of. If I had the 65 feet, I'd have a proud building.

And in this same vein, the property west of the freeway, close to the hospital, needs to have the heights that are proposed there for affordable housing for the people who work in the hospital. You know, someday we're going to have Sound Transit rail to the city. This is going to be a new city if we do it right. If we stay in the 21st century this would be Northgate, a new city. So I want to thank everyone for listening to me, and I know that you people have done a lot of hard work and study for this proposal and I certainly thank you for that.

MR. WEINMAN: Thank you. Is there anyone else who would like to provide comments?

STATEMENT OF BARBARA MAXWELL

My name is Barbara Maxwell, 835 Northeast 100th Street, Seattle 98125. And I've been interested in the comments from many of the people that I know from 20 years ago of planning. And I find myself in a difficult position tonight because I only got the DEIS on Sunday, haven't really had a chance to study it.

But there are a few things I think that are

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1 important for us to consider at this juncture. And one
 2 of the things is that the Northgate CTIF was certainly
 3 developed with a number of projects identified. And a
 4 lot of these assumptions for the upzone assume that
 5 many of those projects are going to go forward. But I
 6 think that it should be understood that those are
 7 not -- the CTIF projects are not funded. I think that
 8 of course the projects, development projects, are
 9 subject to SEPA review when they come in, notably,
 10 Simon Property Group, the expansion of the mall.

11 I looked at the decisions issued after the city
 12 reviewed these projects under SEPA. There were no
 13 mitigation requirements of Simon that were identified
 14 under SEPA. On Lorig, the development in the south
 15 parking lot, there was -- Lorig was required to do one,
 16 to provide a fair-share contribution to the
 17 installation of a traffic signal at the new Third
 18 Avenue south parking lot and Northeast 103rd Street
 19 area. I think Kevin's project is required to
 20 contribute a fair share to some improvements at Fifth
 21 and Northgate Way. So I think that certainly those big
 22 projects, the south parking lot will include a
 23 14-screen cinema, certainly a large traffic generator
 24 at certain times of the day.

25 And I think it's unrealistic for us to assume that

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1 some of the smaller projects that come along are going
 2 to be required to contribute to the CTIF projects under
 3 SEPA. I think the reality is that the public is going
 4 to be paying for these improvements sooner or later, or
 5 else we're going to be stuck with traffic conditions
 6 that are going to deteriorate.

7 Pedestrian improvements. I think these lovely
 8 improvements that we see along Fifth Avenue, and thanks
 9 to Kevin Wallace for his foresight in including the 20-
 10 foot sidewalks, he's recognized the need to have that
 11 larger space for pedestrians to get a little bit
 12 further away from the high speeds of traffic. So we
 13 need more people that are willing to contribute to
 14 those pedestrian improvements from the private sector
 15 as well as the public sector.

16 Light rail. Everyone has mentioned the
 17 possibility of light rail and how important that will
 18 be to the transportation system. But the reality is
 19 that there is no funding for the light rail
 20 construction from downtown to Northgate at this time.
 21 And there's still some debate about whether to put that
 22 on the ballot in the near future or the far future. So
 23 there's assumptions that accompany this rezone that I
 24 question the validity of those right at the moment.

25 The incentive package is still in draft form. It

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1 isn't clear to me. It sounds like there should be more
 2 discussion about places where it could go to 125 feet.
 3 There probably are some in the Northgate area, maybe
 4 not those that have been identified so far. There's
 5 the transit-oriented development on the west side of
 6 the property where the transit center is. There are
 7 some sites that might lend themselves to that
 8 development. But I think it takes more discussion.

9 I should point out also that even though the urban
 10 center park north of 112th Street is in the planning
 11 stages now, the development of that park is not funded
 12 either.

13 So it seems like there's a lot of the cart being
 14 in front of the horse with the plans. And the
 15 infrastructure and the quality of life things are left
 16 too much to chance in my view. I think it takes more
 17 thought to proceed. And I would appreciate a longer
 18 opportunity than two or three days from now in which to
 19 submit comments on the subject. I know it's the
 20 minimum that SEPA requires, but I would request an
 21 extended comment period to have thoughtful input into
 22 development of a preferred alternative. Thanks.
 23
 24
 25

STATEMENT OF RYAN MILLER

1 My name's Ryan Miller. I live at 1047 Northeast
 2 104th. So I have a few concerns and also a question.
 3 My main concern is with the broad rezone of 125 feet. I
 4 don't feel that we have the infrastructure right now.
 5 I drive down Northgate every day going to and from to
 6 get to work, to get to I-5, and the traffic is a mess
 7 right now. Without expanding the roads and without
 8 improving sidewalks or bike lanes and things like that
 9 first and just upping the zoning, this is going to be a
 10 mess. And that really concerns me. So I think the
 11 priority first needs to be getting funding to improve
 12 the roads and sidewalks. Have the infrastructure there
 13 before we allow people to increase the density.

14 So again, I think the broad rezone now is not
 15 acceptable. I don't think that that should happen.

16 I'm also concerned about potential flooding, because if
 17 we're taking away more grassy areas and more trees,
 18 where's the rainwater going to go? And I heard from
 19 somebody that this area used to be like a kind of
 20 swampy area or peat bog or something, and that concerns
 21 me as well. So I think that needs to be looked at, as
 22 well, for rainwater runoff, where is it going to go?
 23 And if we just put concrete everywhere, what's going to
 24
 25

1 48-2 | happen.

2 | I think, you know, again, sidewalks need to be
3 | added. This is not only going to affect roadways out
4 | here, this is going to affect the areas over here too.
5 | It's just a few blocks to this new development over
6 | here with the movie theater, and as more stuff gets
7 | 48-3 | developed, more people are going to be parking and
8 | walking from the residential areas. Right now there's
9 | no sidewalks. There's sidewalks on main streets, but
10 | there's no sidewalks in the residential areas. So
11 | again, this is part of the infrastructure that needs to
12 | be built so people can safely walk and park and get to
13 | these places.

14 | I also think probably more crosswalks would need
15 | to go in. That's another concern. Right now, when I
16 | drive to work, I actually come down 130th to get to I-5
17 | and there's construction workers haphazardly running
18 | across the street right in front of me that I don't
19 | 48-4 | see. This also happens to me on my way home going to
20 | Northgate. So it's because there aren't enough
21 | crosswalks and they can't get across the street, so
22 | they just run across and pray that they make it without
23 | someone hitting them. So that's a concern. One
24 | thought is maybe having pedestrian bridges going over
25 | 103rd and over Northgate Way. That would solve the

1 | problems I think -- or maybe a few of them. I think
2 | 48-4 | that was all my comments.

3 | The other thing I wanted to add, which Barbara
4 | mentioned, is about getting the comment period
5 | extended. King of seems like it's being rushed a
6 | little bit. We having this meeting and then within a
7 | 48-5 | couple of days the comment period ends. And I think a
8 | lot of my neighbors don't even know that this proposal
9 | is going on. So I think that would be beneficial if
10 | you want to get feedback from the residents who
11 | actually live here. It might be beneficial to extend
12 | that.

13 | MR. WEINMAN: I'll just respond to that one
14 | quickly. If you'd like to request an extension of the
15 | comment period, you should get that request to DPD as
16 | soon as possible before the end of the comment period.

17 | MR. FISCHBURG: Can we just say that the
18 | request is made. It's in the record. The public
19 | comment period will be extended. So it's been done.

20 | MR. KOFOED: We should be clear, though,
21 | about how long we're extending it for. And we'll post
22 | a notice of that on our Web site and other required
23 | places. But obviously at this point it will be
24 | extended for the additional 15 days, which is what we
25 | can do under SEPA. So comments should be in by close

1 of business June 17th. Okay.

2
3 STATEMENT OF GREG GOODWIN

4
5 I'm Greg Goodwin, 2215 North 107th, and I have a
6 couple of thoughts. First is regarding the issue of
7 concurrency. I think it would be very undesirable if
8 the site was underdeveloped or the acreage here is
9 underdeveloped or underzoned in the long haul because I
10 think it will be very harmful in the long run goal of
11 extending the light rail up here. So if we limit the
12 density too much we'll never get light rail.

13 And I have a second point, as a builder, to
14 corroborate what a couple speakers ago, what the fellow
15 said is that it's not really practical to build a
16 building above 65 feet unless you're building quite a
17 big building. So 65 foot zoning is really meaningless
18 zoning because you can't really build to that height.
19 You either should build a 65 foot building and have it
20 zoned that way or you should build a much bigger
21 building, which is much more expensive and marketable
22 and financeable. You can't really do it in between.

23 So I would suggest perhaps that the market drive
24 what will be built there, increase the density quite
25 bit, and allow the people to build something practical

1 and financeable and allow that to bring light rail
2 perhaps not too far in the future to this area. Thank
3 you.

4 MR. WEINMAN: Any other comments?

5
6 STATEMENT OF KEN MEYER

7
8 I just thought I'd scan the audience for eggs and
9 tomatoes, and I think I'm safe for a while.

10 My name is Ken Meyer, 1509 North 143rd Street.

11 I've followed this process. I've gone to the
12 Stakeholders meetings, although I haven't been an
13 official Stakeholder. And the cynical part of me is
14 kind of smelling a little bait and switch here. One of
15 the big arguments for the development that's been done
16 here so far is that Simon was going to dump the mall if
17 they weren't allowed to do big expansion and stuff.
18 And people said, Oh, people are going up to Alderwood.
19 We see in the checks that come back they're all made
20 out to places in Alderwood. We have to compete with
21 Alderwood and U Village and whatever. So it's happened
22 here.

23 Now, what we did was we said we're going to be a
24 destination shopping area, okay? And people are not
25 going to come on the bus far enough in enough numbers

1 to support these huge stores. you know. It's not a
 2 Seven-Eleven on the corner. So we've already -- and we
 3 have a 14-theater cinema going in here. You know,
 4 we've really committed -- and we've committed to these
 5 people, and we've also had the transit center and we've
 6 committed that this is going to be a hub for people to
 7 drive to and then go on downtown or wherever, and we
 8 made all those provisions.

9 And now what I hear a lot of people saying is
 10 we're going to increase the density here so that the
 11 traffic at Meridian and Northgate Way and Fifth and
 12 Northgate Way is going to be just -- well, the hell
 13 50-1 with it. I'm going to go to Alderwood Mall anyway. And
 14 so there's a big schizophrenia going on here. And of
 15 course we've heard a lot from developers, and all I
 16 hear is cash registers ringing. And I'm concerned that
 17 if we do get affordable housing, it won't be affordable
 18 on their part, it will be that we're subsidizing it
 19 with taxes, so we've just redistributed the rental
 20 income. But they're doing very well.

21 So I know that there's lots of stress back and
 22 forth, but I just urge you when you go about this that
 23 you keep in mind where we've come to and you don't then
 24 trash what's the previous plans and make the
 25 investments that have already been done pretty

1 50-1 untenable.

2 And I would say just one more thing is that, as I
 3 get older, you know, it's really hard to walk even what
 4 would have been a trivial matter to the bus anymore.
 5 I'm still not senile enough so that I have to have my
 6 50-2 driving \$6'd yet, but I need the car, really. And I'm
 7 not going to carry big packages home. There are a lot
 8 of people around here like me. So you have to consider
 9 the entire population and not just two-income young
 10 couples who've got a lot of money to throw around.

11 Thank you.

12 MR. WEINMAN: Would anyone else like to make
 13 a comment? Okay. Remember there are comment forms on
 14 the table that you can use to provide written comments.
 15 Please sign in on the sign-in sheet. And the comment
 16 period has been extended to the 17th, and that will be
 17 noticed in a variety of places.

18 [Hearing ended at 8:36 p.m.]

Public Meeting Testimony

33. Carol Carnahan

1. Your comment is noted. Please note that actions described in Chapter 2 of this Final EIS Alternative 3 include additional elements that would enhance the pedestrian environment.

34. Mary Mills

1. Your comment regarding contrasts in density is acknowledged. Note that Final EIS Alternative 3 would not rezone properties at the north edge of Sub-Area D and would create a more gradual transition to low density residential properties adjacent to the Urban Center.

35. Renee Staton

1. Your comment is noted.

2. Your comment is noted.

3. Your comment is noted. The parcels located outside the designated Urban Center are excluded from EIS Alternatives 2 and 3.

4. Please see the response to Letter No. 33 Comment No. 1 above.

5. Your comment is noted.

6. Your comment is noted.

36. Colleen Mills

1. Your comment is noted. Please see the zoning for this site included in Final EIS Alternative 3..

37. Sue Geving

1. Your comment is noted. Please note that Final EIS Alternative 3 would retain the existing low-rise multi-family zoning adjacent to almost all of the northern border of the study area.

2. Your concern is noted. The alternatives examine the effects of different combinations of zoning designations, and include some NC3 zones adjacent to NE Northgate Way. In general, Alternatives 2 and 3 include a band of residential use between more intensive uses along NE Northgate Way and existing single family residential neighborhoods bordering the study area.

38. Gail Gautestad

1. Your comment is noted.
2. Your comment is noted. The EIS concludes that projected levels of service at both Meridian and Corliss would not differ under the alternatives.
3. Your comment is noted.
4. Your comment is noted.

39. Shaiza Damji

1. Your comment is noted.
2. Your comment regarding the objectives of the rezones is noted.
3. Your comment is noted. Please refer to Final EIS Alternative 3, which would encourage contract rezones that achieve greater intensification of development, and heights up to 125 feet, in the portion of the study area west of I-5.
4. Please see the response to the previous comment.
5. Please see the response to Comment 3 above.

40. Richard Truax

1. Your comment regarding pedestrian conditions is noted. Actions described in Chapter 2 of this Final EIS include several additional tools that would help improve the pedestrian environment and encourage bicycle use.
2. Your comment regarding building design is noted.
3. Your comment is noted.
4. Please see the response to Comment 1 above.

41. Greg Hunter

1. Your comment in support of rezoning is noted.

42. John Mullaly

1. Your comment is noted. Please refer to the zoning for this property associated with Final EIS Alternative 3.
2. Your comment is noted. Funding for the next phase of light rail, including service to Northgate, was approved by the voters in November 2008.
3. Your comment regarding density is noted.
4. Your comment regarding zoned capacity is noted. Please refer to the response to Letter No. 3 Comment 2.

43. Melody McCutcheon

1. Your comment supporting increased density is noted.
2. Please refer to the response to Letter No. 6 Comment 3 regarding incentive zoning.
3. Please refer to the response to Letter No. 6 Comment 4 regarding greenhouse gases.

44. Grace Kim

1. Your comments regarding the park are noted. Please refer to the description of Final EIS Alternative 3 and the additional discussion in Chapter 3 of the Final EIS.
2. Please see the various responses to Letter No. 1 regarding water quality.

45. Kevin Wallace

1. Your comment is noted.
2. Your comments regarding pedestrian improvements and greater building heights are noted. Both of these elements are included in Final EIS Alternative 3.

46. Sy Iffert

1. Your comment in support of Alternative 1 is noted.
2. Your comment in support of development west of I-5 is noted.

47. Barbara Maxwell

1. Your comment concerning traffic mitigation is noted. Please see the discussion of the Voluntary Transportation Mitigation Payment Program in Section 2.5 of the Final EIS. It would provide a tool to help fund planned traffic improvements from the CTIP in Northgate.

2. Your comment is noted. Additional techniques to provide pedestrian improvements are identified in the discussion of Final EIS Alternative 3..
3. Since the time of this comment, the voters approved funding of the next phase of the light rail system, which includes service to and beyond Northgate.
4. Final EIS Alternative 3. includes more locations where buildings could be 125 feet in height.
5. Since the time of this comment, Hubbard Homestead Park has been funded and designed; construction began in late 2009.
6. In response to requests at the EIS meeting on May 28, 2008, the EIS comment period was extended by 15 days. Additional planning has also occurred since that time, and several regulatory and incentive programs are being developed to address infrastructure and quality of life needs in Northgate. Various programs would occur either irrespective of or in conjunction with rezones. Please refer to Chapter 2 of the Final EIS for a description of potential programs.

48. Ryan Miller

1. Your comment is noted. The CTIP measures will be implemented concurrently with development. Project review of individual development proposals will also consider what improvements are needed to address the impacts of the specific project under review.
2. Please refer to the related responses to Letter No. 1 regarding stormwater management.
3. Your comment is noted.
4. Your comment is noted. Please see the response to Letter No. 47, Comment 2.
5. In response to requests at the EIS meeting on May 28, 2008, the EIS comment period was extended by 15 days.

49. Greg Goodwin

1. Your support of upzoning is noted. Funding for the next phase of the regional light rail system was approved by the voters in November 2008.
2. Your support for taller buildings is noted. Please refer to Final EIS Alternative 3.

50. Ken Meyer

1. Your comments regarding Northgate Mall are noted. Please see the description of the City's incentive zoning provisions in Chapter 2 of the Final EIS.
2. Your comment is noted.

CHAPTER 5 REFERENCES (INCLUDES REFERENCES FROM DRAFT EIS)

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CHAPTER 6 NORTHGATE URBAN CENTER FINAL EIS DISTRIBUTION LIST

Federal

U.S. Environ. Protection Agency Region 10
U.S. Fish & Wildlife Service, Pacific
Region
National Marine Fisheries Service

Native American

Muckleshoot Indian Tribe
United Indians of All Tribes Foundation

State

Washington St. Dept. of Ecology
Washington St. Dept. of Fish & Wildlife
Washington St. Dept. of Archaeology and
Historic Preservation
Washington St. Dept. of Community
Development
Washington St. Dept. of Transportation

Regional and other agencies

Puget Sound Regional Council
Puget Sound Clean Air Agency
Sound Transit
Seattle Housing Authority

King County

King County Executive's Office
King County Dept. of Development and
Environmental Services
King County Housing and Community
Development
King County Dept. of Transportation /
Metro
Seattle-King County Public Health
Department

Other

Seattle School District
City of Shoreline

City of Seattle (through interoffice mail)

City Council Legislative Department
Fire Department
Police Department
Transportation
Office of Housing
Office of Economic Development
Neighborhoods
City Light
Public Utilities
Parks and Recreation
Fleets and Facilities, Emergency
Management
Planning Commission
Design Commission

APPENDIX A

METHODOLOGY FOR DETERMINING GROWTH CAPACITY FOR THE NORTHGATE URBAN CENTER REZONE IMPACT ANALYSIS

Under the Growth Management Act, all jurisdictions are required to plan for enough growth to accommodate a twenty-year population projection developed by the State Office of Financial Management. In the Central Puget Sound Region, the Puget Sound Regional Council (PSRC) and local governments within the region agree on a strategy to distribute and accommodate that growth over the next twenty years. “Targets” for population and employment growth are then allocated to individual jurisdictions, who adopt the targets as part of their Comprehensive Plans.

“Growth capacity” or “development capacity” is an estimate of what type and how much development is likely to be built within an area, and which properties within the area are most “likely” to be developed over some period of time. The estimates consider zoning, environmentally constraints, need for right-of-way and other public facilities, economic conditions, and similar factors. These estimates are used by all jurisdictions planning under the Growth Management Act as a general way to gauge how much population and employment they plan to accommodate. Many cities further divide and allocate their growth targets to sub-areas. The City of Seattle allocates growth to neighborhoods, Urban Villages or Urban Centers, after determining how much growth capacity is present in various sub-areas. Urban Centers, which are intended to develop as concentrations of high density mixed-use development, are planned to accommodate a significant portion of forecast growth, and are a key element in the regional and local growth strategy.

For the purposes of transportation analysis, the city is divided into traffic analysis zones (TAZs), which are small areas used to model traffic movement. For each TAZ there is a population and employment estimate that is based on projected demand and the capacity for additional development under existing zoning, which we refer to here as “development capacity”.

Development capacity is the net additional development that is likely to occur in the foreseeable future. Not all properties are likely to redevelop, and most properties within Seattle already have some development on them. The development capacity therefore represents how much more development can be accommodated on the properties that are considered likely to be developed or redeveloped.

For the Comprehensive Plan, properties that are likely to be redeveloped are determined using a very general formula based on assessed property values. If the assessed value of the improvements on a property is less than 50 percent of the assessed value of the land, a property is considered likely to redevelop. In the case of the Northgate Urban Center Rezone, the same analysis was used to initially identify properties that are likely to redevelop, but further analysis completed with consultation with Heartland, a real estate consulting firm, identified additional properties that are likely to redevelop, including two relatively large properties, which increased the capacity for development above that estimated for the Comprehensive Plan and used for the CTIP EIS.

The other step in determining development capacity is estimating what is likely to be built under existing zoning. For Comprehensive Plan purposes, a formula is developed for each land use/zoning designation in the city based on the development permits issued in each zone in recent years. This formula estimates how much floor area is likely for a given site area (floor area ratio), projects a certain mix of residential and commercial uses, and takes into account the average unit size and efficiency of floor area use for residential development. To get the net

capacity for development, existing commercial floor area and residential units are subtracted from the total development likely under the zoning.

The starting assumption for the growth analysis for the Northgate Urban Center Rezone was that the “baseline” (i.e., the assumed amount of growth expected and planned for) would be the same as that used Northgate CTIP EIS. The CTIP EIS was based on growth assumptions and targets used in developing the City’s Comprehensive Plan,

For the CTIP and CTIP EIS, estimates of development capacity were completed by the City and the capacity derived was used in projecting growth in each TAZ. However, the City has recently updated its formulas for estimating development capacity, and these formulas generally reflect a trend of greater utilization of the allowable development, especially in Neighborhood Commercial zones. For the Northgate Urban Center Rezone impact analysis, the newer formulas were applied to the properties within the study area that are considered likely to be redeveloped. This also resulted in slightly greater estimated development capacity than was used for the CTIP EIS.

Taken together, the additional properties that are considered likely to redevelop, and the newer formulas for projecting development capacity, result in development capacity being substantially higher in the Northgate Urban Center than was assumed in the CTIP EIS.

To reflect this situation, to make sure that the Northgate Urban Center Rezone analysis did not underestimate potential impacts, and to also consider market and economic factors, it was assumed that the higher development capacity in the Northgate Urban Center Rezone study area would be realized as a result of rezoning, but that overall growth in the Northgate Planning Area would remain within the Comprehensive Plan’s targets. The overall level of growth for the area is estimated by PSRC based on regional trends, and the change in estimated development capacity is not, therefore, expected to change the overall demand for development on the Northgate Urban Center. Because market demand is limited, regardless of zoning actions, growth is expected to shift within Northgate to reflect the additional development potential created by rezoning. Some lands outside the Urban Center would be less likely to develop, while rezoned property within the Urban Center would be more likely to develop at greater intensity.

As a result of these changed assumptions, the model results for the Rezone EIS No Action alternative and the CTIP Baseline Condition show different results at some intersections. For example, at 8th Avenue NE and Northgate Way for the Rezone EIS No Action, delay would increase and the level of service would decrease compared to the CTIP 2030 baseline (see Table 4-3). This is a reflection of the changes described previously. Delay also increases by one second at Corliss Ave. N and Meridian Avenue N. On the other hand, for other Northgate Way intersections – including 1st Avenue NE and 3rd Avenue NE -- delay under No Action would decrease compared to CTIP and the level of service would remain the same.

This approach, while departing from the initial assumption of the CTIP EIS, reflects both better real estate analysis and more current development patterns in the affected land use zoning designations than were available for the CTIP EIS. Therefore, it is a more accurate portrayal of the development anticipated in the area than using just the assumptions from CTIP.

Table A-1 below shows the assumptions used in the development capacity analysis. Table A-2 shows the development capacity spreadsheet for the properties that are considered likely to redevelop. Table A-3 shows conclusions used in the Final EIS.

Table A-1

<i>Existing zoning</i>	<i>Assumed FAR</i>	<i>Assumed residential density (SF of lot area /unit)</i>		<i>Percent residential</i>
L-1	N/A	1600		100%
L-2	N/A	1200		100%
L-3	N/A	1100		100%
L-4	N/A	800		100%
MR	N/A	350		100%
MR-85	N/A	350		100%
NC2-40	3.25	500		80%
NC3-40	3.25	500		80%
NC3-65	4.75	350		80%
NC3-85	6	300		80%
NC3-125	6	250		80%
NC3-160	7	280		80%
Short	2007-2010			
Medium	2010-2020			
Long	2020+			
<i>Parcel Description</i>	<i>Parcel Size (SF)</i>	<i>FAR/Density Utilization</i>		
Large	120000+	Minimum:	60%	
Medium	20,001-119,999		70%	
Small	20,000	Maximum:	90%	
<i>Unit Size</i>				
Stacked Flats	850 Square Feet			
Townhomes	1,200 Square Feet			
<i>Efficiency</i>				
Stacked Flats	80%	Net SF as % of Gross		
Townhomes	95%			
<i>Residential as % of Project in NC zones</i>				
residential focus	75%			
commercial focus	20%			

Table A-2

STAZ	PIN	parcel_sqft	exist_com_sqft	exist_resmits	Avg Unit Size	HIGHLAND FAR USAGE	Existing zoning	Assumed FAR - existing zoning	Efficiency- Existing Zoning	Assumed residential density (SF of lot area /unit)-Existing zoning	Residential Usage as % of project- Existing Zoning	Commercial development potential (Net gsf)	Residential development potential (net units)	Zoning under broad rezone	Assumed Future FAR - Alt 1 Broad rezone	Efficiency- Alt 1	Assumed residential density (SF of lot area /unit)-broad rezone	Residential Usage as % of project- Alt 1 residential focus	Commercial development potential (Net gsf)	Residential development potential (net units)	Zoning under broad rezone-commercial focus	Assumed Future FAR - Alt 1 Broad rezone	Efficiency- Alt 1	Assumed residential density (SF of lot area /unit)-broad rezone	Residential Usage as % of project- Alt 1 Commercial focus	Commercial development potential (Net gsf)	Residential development potential (net units)	Zoning under Focused rezone-Alt 2	Assumed Future FAR - Focused rezone	Efficiency- Alt 2	Assumed residential density (SF of lot area /unit)-broad rezone	Residential Usage as % of project- Alt 2	Commercial development potential (Net gsf)	Residential development potential (net units)	Zoning under UDF	Assumed Future FAR - UDF	Efficiency-UDF	Assumed residential density (SF of lot area /unit)-UDF	Residential Usage as % of project- Alt 1 residential focus	Commercial development potential (Net gsf)	Residential development potential (net units)	Net change in units over Broad rezone
27	4358700230	30484	2838	0	800	70%	NC3-40	3.25	80%		75%	14500	52	NC3-65'	4.75	80%		75%	22502	76	NC3-65'	4.75	80%		20%	78249	20	NC3-40	3.25	80%		75%	14500	52	MR-60	3.25	80%		75%	14500	52	-24
30	2044500350	35349	0	44	800	60%	L-3	N/A	80%	1100	100%	0	0	NC3-40	3.25	80%		75%	17233	7	NC3-40	3.25	80%		20%	55144	-31	L-3	N/A	80%	1100	100%	0	0	L-3	N/A	80%	1100	100%	0	0	-7
20	2044500360	74063	0	0	800	60%	L-3	N/A	80%	1100	100%	0	32	NC3-40	3.25	80%		75%	36106	108	NC3-40	3.25	80%		20%	115538	28	L-3	N/A	80%	1100	100%	0	32	L-3	N/A	80%	1100	100%	0	32	-76
30	2044500380	42799	0	53	800	60%	L-3	N/A	80%	1100	100%	0	0	NC3-40	3.25	80%		75%	20865	9	NC3-40	3.25	80%		20%	66766	-37	L-3	N/A	80%	1100	100%	0	0	L-3	N/A	80%	1100	100%	0	0	-9
42	1160000045	6663	0	2	1200	90%	L-1	N/A	95%	1600	100%	0	1	L-2	N/A	95%	1200	100%	0	2	L-2	N/A	95%	1200	100%	0	2	L-1	N/A	95%	1600	100%	0	1	L-1	N/A	95%	1600	100%	0	1	-1
42	1160000049	6886	0	2	1200	90%	L-1	N/A	95%	1600	100%	0	1	L-2	N/A	95%	1200	100%	0	2	L-2	N/A	95%	1200	100%	0	2	L-1	N/A	95%	1600	100%	0	1	L-1	N/A	95%	1600	100%	0	1	-1
42	1160000050	6665	0	2	1200	90%	L-1	N/A	95%	1600	100%	0	1	L-2	N/A	95%	1200	100%	0	2	L-2	N/A	95%	1200	100%	0	2	L-1	N/A	95%	1600	100%	0	1	L-1	N/A	95%	1600	100%	0	1	-1
42	1160000055	6123	1	1	1200	90%	L-1	N/A	95%	1600	100%	0	2	L-2	N/A	95%	1200	100%	0	3	L-2	N/A	95%	1200	100%	0	3	L-1	N/A	95%	1600	100%	0	2	L-1	N/A	95%	1600	100%	0	2	-1
42	1160000005	33603	0	38	800	60%	NC2-40	3.25	80%		75%	16381	11	NC3-65	4.75	80%		75%	23942	33	NC3-65	4.75	80%		20%	76615	-19	NC2-40	3.25	80%		75%	16381	11	NC2-40	3.25	80%		75%	16381	11	-22
42	5724500205	26671	11992	0	800	60%	NC3-40	3.25	80%		75%	1010	39	NC3-65	4.75	80%		75%	7011	57	NC3-65	4.75	80%		20%	48818	15	NC3-40	3.25	80%		75%	1010	39	NC3-40	3.25	80%		75%	1010	39	-18
42	5724500385	14996	1056	0	800	90%	NC3-40	3.25	80%		75%	9910	32	NC3-65	4.75	80%		75%	14971	48	NC3-65	4.75	80%		20%	50230	12	NC3-40	3.25	80%		75%	9910	32	NC3-40	3.25	80%		75%	9910	32	-16
42	5724500420	15005	4416	0	800	90%	NC3-40	3.25	80%		75%	6556	32	NC3-65	4.75	80%		75%	11621	48	NC3-65	4.75	80%		20%	46901	12	NC3-40	3.25	80%		75%	6556	32	NC3-40	3.25	80%		75%	6556	32	-16
42	5724500590	16360	4496	0	800	90%	NC3-40	3.25	80%		75%	7467	35	NC3-65	4.75	80%		75%	12989	52	NC3-65	4.75	80%		20%	51455	13	NC3-40	3.25	80%		75%	7467	35	NC3-40	3.25	80%		75%	7467	35	-17
42	5724500615	136675	41431	0	800	60%	NC3-40	3.25	80%		75%	0	0	NC3-65	4.75	80%		75%	0	0	NC3-65	4.75	80%		20%	0	0	NC3-40	3.25	80%		75%	0	0	NC3-40	3.25	80%		75%	0	0	0
42	5724500819	16518	3609	0	800	90%	NC3-40	3.25	80%		75%	8470	36	NC3-65	4.75	80%		75%	14045	52	NC3-65	4.75	80%		20%	52883	14	NC3-40	3.25	80%		75%	8470	36	NC3-40	3.25	80%		75%	8470	36	-16
42	5724500825	13387	1640	0	800	90%	NC3-40	3.25	80%		75%	8149	29	NC3-65	4.75	80%		75%	12667	42	NC3-65	4.75	80%		20%	44144	11	NC3-40	3.25	80%		75%	8149	29	NC3-40	3.25	80%		75%	8149	29	-13
43	2926049206	13709	3680	0	1200	90%	L-2	N/A	95%	1200	100%	0	9	L-3	N/A	95%	800	100%	0	14	L-3	N/A	95%	800	100%	0	14	L-2	N/A	95%	1200	100%	0	9	L-2	N/A	95%	1200	100%	0	8	-6
43	2926049118	13312	5876	0	800	90%	L-3	N/A	80%	1100	100%	0	8	L-4	N/A	80%	800	100%	0	11	L-4	N/A	80%	800	100%	0	11	L-3	N/A	80%	1100	100%	0	8	L-2	N/A	80%	1200	100%	0	7	-4
43	2926049473	16801	0	0	800	90%	L-3	N/A	80%	1100	100%	0	10	L-4	N/A	80%	800	100%	0	15	L-4	N/A	80%	800	100%	0	15	L-3	N/A	80%	1100	100%	0	10	NC3-85	6	80%	350	100%	0	90	75
43	2926049234	12104	8834	0	800	90%	L-4	N/A	80%	800	100%	0	10	L-4	N/A	80%	800	100%	0	10	L-4	N/A	80%	800	100%	0	10	L-4	N/A	80%	800	100%	0	10	MR-85	N/A	80%	350	100%	0	24	14
43	2926049036	44772	14615	0	800	60%	NC2-40	3.25	80%		75%	7211	65	NC3-65	4.75	80%		75%	17285	95	NC3-65	4.75	80%		20%	87465	25	NC3-65	4.75	80%		75%	17285	95	NC3-85	6	80%		75%	25680	120	25
43	2711100005	12502	3596	0	800	90%	NC3-40	3.25	80%		75%	5546	27	NC3-65	4.75	80%		75%	9766	40	NC3-65	4.75	80%		20%	39161	10	NC3-40	3.25	80%		75%	5546	27	NC3-40	3.25	80%		75%	5546	27	-13
43	2711100040	19996	12492	0	800	90%	NC3-40	3.25	80%		75%	2130	43	NC3-65	4.75	80%		75%	8879	64	NC3-65	4.75	80%		20%	55894	17	NC3-40	3.25	80%		75%	2130	43	NC3-40	3.25	80%		75%	2130	43	-21
43	2926049119	17417	1769	0	800	90%	NC3-40	3.25	80%		75%	10967	38	NC3-65	4.75	80%		75%	16845	55	NC3-65	4.75	80%		20%	57797	14	NC3-65	4.75	80%		75%	16845	55	NC3-85	6	80%		75%	21744	70	15
43	2926049163	63690	32009	0	800	60%	NC3-40	3.25	80%		75%	-960	93	NC3-65	4.75	80%		75%	13370	136	NC3-65	4.75	80%		20%	113204	36	NC3-65	4.75	80%		75%	13370	136	NC3-65	4.75	80%		75%	13370	136	0
43	2926049224	22530	10387	0	800	60%	NC3-40	3.25	80%		75%	596	32	NC3-65	4.75	80%		75%	5666	48	NC3-65	4.75	80%		20%	40981	12	NC3-40	3.25	80%		75%	596	32	NC3-125	6	80%		75%	9890	60	12
43	2926049270	7159	0	0	800	90%	NC3-40	3.25	80%		75%	5235	15	NC3-65	4.75	80%		75%	7651	22	NC3-65	4.75	80%		20%	24484	6	NC3-40	3.25	80%		75%	5235	15	NC3-125	6	80%		75%	9665	28	6
43	2926049375	6828	2010	0	800	90%	NC3-40	3.25	80%		75%	2983	14	L-4	N/A	80%	800	100%		6	L-4	N/A	80%	800	100%		6	L-3	N/A	80%	1100	100%	0	4	MR-85	N/A	80%	350	100%	-2010	14	8
43	2926049357	14546	7152	0	800	60%	NC3-40	3.25	80%		75%	3485	31	L-4	N/A	80%	800	100%		13	L-4	N/A	80%	800	100%		13	L-3	N/A	80%	1100	100%	0	9	MR-85	N/A	80%	350	75%	-3879	29	16
43	2926049279	11308	0	0	800	90%	NC3-40	3.25	80%		75%	8269	24	NC3-65	4.75	80%		75%	12085	36	NC3-65	4.75	80%		20%	38673	9	NC3-65	4.75	80%		75%	12085	36	NC3-85	6	80%		75%	15266	45	9
43	2926049392	24235	8954	0	800	60%	NC3-40	3.25	80%		75%	2861	35	NC3-65	4.75	80%		75%	8313	51	NC3-65	4.75	80%		20%	46302	13	NC3-65	4.75	80%		75%	8313	51	NC3-85	6	80%		75%	12858	65	14
43	2926049401	13300	6000	0	800	90%	NC3-40	3.25	80%		75%	3726	29	NC3-65	4.75	80%		75%	8214	42	NC3-65	4.75	80%		20%	39486	11	NC3-65	4.75	80%		75%	8214	42	NC3-85	6	80%		75%	11955	53	11
43	2926049468	215505	99292	0	800	60%	NC3-40	3.25	80%		75%	5767	315	NC3-65	4.75	80%		75%	54255	460	NC3-65	4.75	80%		20%	392059	122	NC3-65	4.75	80%		75%	54255	460	NC3-125/85	6	80%		75%	94663	581	121
43	2926049472	18822	3162	0	800	90%	NC3-40	3.25	80%		75%	10602	41	NC3-65	4.75	80%		75%	16954	60	NC3-65	4.75	80%		20%	61209	16	NC3-65	4.75	80%		75%	16954	60	NC3-85	6	80%		75%	22248	76	16
43	2926049535	30898	0	0	800	60%	NC3-40	3.25	80%		75%	15063	45	NC3-65	4.75	80%		75%	22015	66	NC3-65	4.75	80%		20%	70447	17	NC3-40	3.25	80%		75%	15063	45	NC3-125	6	80%		75%	27808	83	17
43	2926049536	27154	0	0	800	60%	NC3-40																																			

Table A-3

CONCLUSIONS								
<i>Total Land Area</i>	4,280,188	sf	98	acres				
<i>Existing Residential Units</i>	1,316							
	Total	By TAZ:	27	30	42	43	45	46
<i>Potential Net units -No action</i>	2,362		52	32	219	1737	320	2
<i>Potential units Alt 1a</i>	4,064		76	124	341	2334	958	231
<i>Potential units Alt 1b</i>	919		20	-40	67	663	248	-39
<i>Potential units Alt 2</i>	3,431		52	32	219	2218	908	2
<i>Alternative 3</i>	4,189		52	32	219	2664	991	231
<i>Potential commercial No Action</i>	324,104		14500	0	57944	235046	0	16614
<i>Potential commercial Alt 1a</i>	1,023,737		22502	74203	97246	431029	375740	23018
<i>Potential commercial Alt 1b</i>	3,946,647		78249	237449	371045	2100344	1085102	74457
<i>Potential commercial Alt 2</i>	818,321		14500	0	57944	399513	329749	16614
<i>Alternative 3</i>	954,443		14500	0	57944	501753	357228	23018
<i>Change due to rezones:</i>								
<i>Potential units Alt 1a</i>	1,702		24	92	122	597	638	1,702
<i>Potential units Alt 1b</i>	(1,443)		(32)	(72)	(152)	(1,074)	(72)	(1,443)
<i>Potential units Alt 2</i>	1,069		-	-	-	481	588	1,069
<i>Alternative 3</i>	1,827		-	-	-	927	671	1,827
<i>Potential commercial Alt 1a</i>	699,633		8,002	74,203	97,246	431,029	375,740	699,633
<i>Potential commercial Alt 1b</i>	3,622,543		63,750	237,449	371,045	2,100,344	1,085,102	3,622,543
<i>Potential commercial Alt 2</i>	494,216		-	-	57,944	399,513	329,749	494,216
<i>Alternative 3</i>	630,339		-	-	57,944	501,753	357,228	630,339
	Total floor area	Net increase in floor area	Approx equivalent in affordable units if full incentive is utilized for housing					
<i>No Action Alternative</i>	324,104	na	na					
<i>Alternative 1a Broad Rezone - Residential Focus</i>	1,347,841	2,798,531	308					
<i>Alternative 1b Broad Rezone - Commercial Focus</i>	2,047,474	3,636,892	400					
<i>Alternative 2 Focused Rezone</i>	4,970,384	1,976,866	217					
<i>Alternative 3 Urban Design Framework</i>	1,842,058	2,521,357	277					
			Assumes 11% ratio, 850 sf/unit, 85% efficiency					

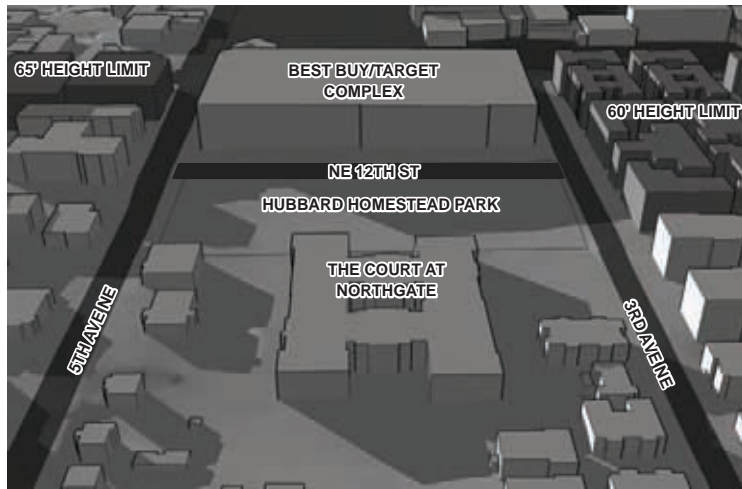
APPENDIX B

**SHADOW DIAGRAMS DEVELOPED FOR THE NORTHGATE URBAN
CENTER REZONE IMPACT ANALYSIS**

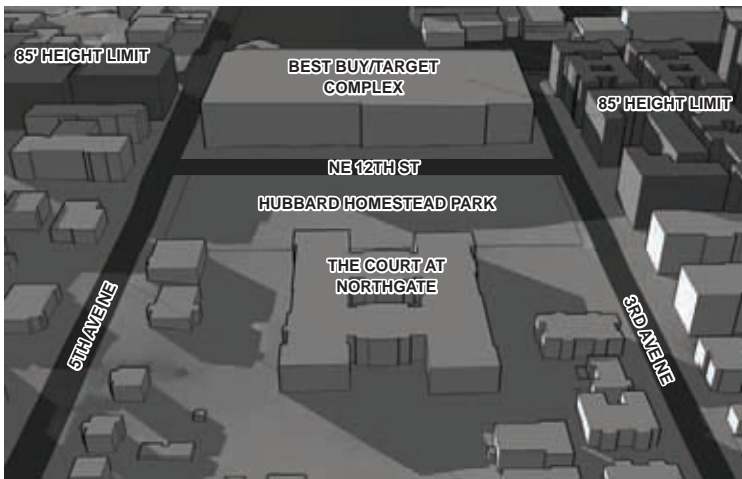
The following images were generated using Google SketchUp™ software to simulate topography and buildings. SketchUp™ also allows a user to select a time of year and time of day to project shadows from 3-dimensional objects like buildings.

Building footprints for the existing zoning were based on City of Seattle data for building footprints and heights. For likely redevelopment sites under all alternatives building massing was based on current zoning standards, but do not necessarily reflect the shape that buildings would be built. For this analysis, buildings were massed so that their shadow impacts on Hubbard Homestead Park would be maximized, so as to examine the worst case scenario under the applicable zoning for each alternative. When a project is designed, the buildings could be designed to reduce these impacts to varying degrees.

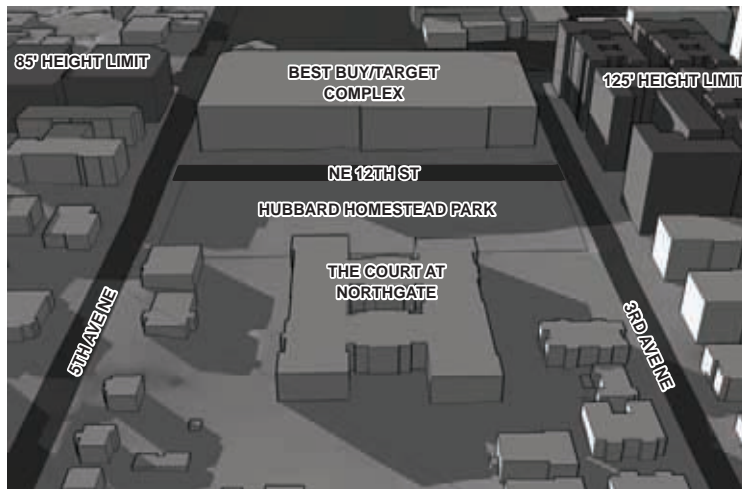
The times were also chosen to reflect a worst case period - the time of year when shadow impacts from rezoned and redeveloped properties would be most noticeable. Since the site to the south of the park is unlikely to redevelop, no change is expected to mid-day shadow impacts as a result of the rezones. The analysis therefore focuses on morning and evening park use. Mid-summer is the time of year when the days are longest and therefore morning and evening use would be highest. June 1st reflects the shadows that could be expected both on that date and on approximately July 10th. These dates bracket the longest days of the year; therefore the reduction in sunlit hours would be greatest on these days.



Current Zoning: Morning Shadow: 9:30am



Broad Zoning: Morning Shadow: 9:30am



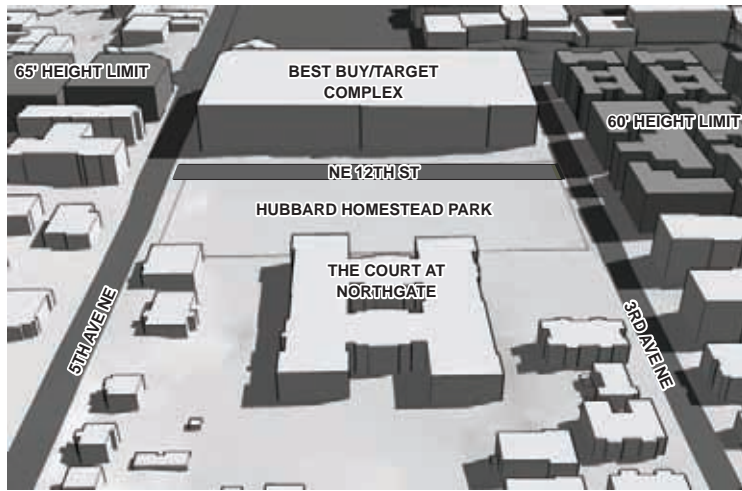
UDF Zoning: Morning Shadow: 9:30am

FILE NAME: FigB-1_Zoning_Morning_BW.ai / UDF
 CREATED BY: JAB / DATE LAST UPDATED: 11/18/09

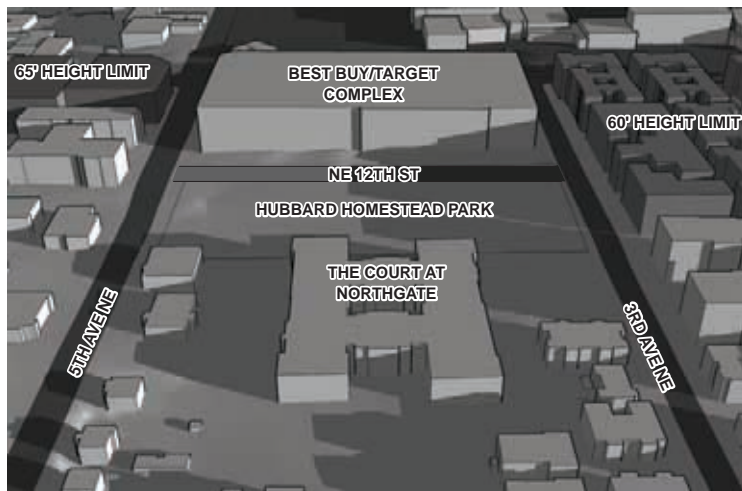
SOURCE: ESA Adolfsen, 2009.

Northgate Urban Center Rezone . 27112

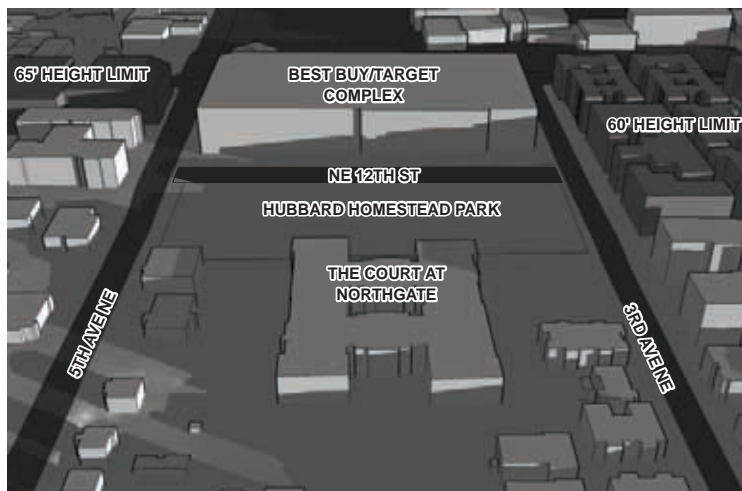
Figure B-1
 Morning Shadow Analysis (November 15th)
 Seattle, WA



Start Shadow: 4:25pm



Half Shadow: 7:45pm



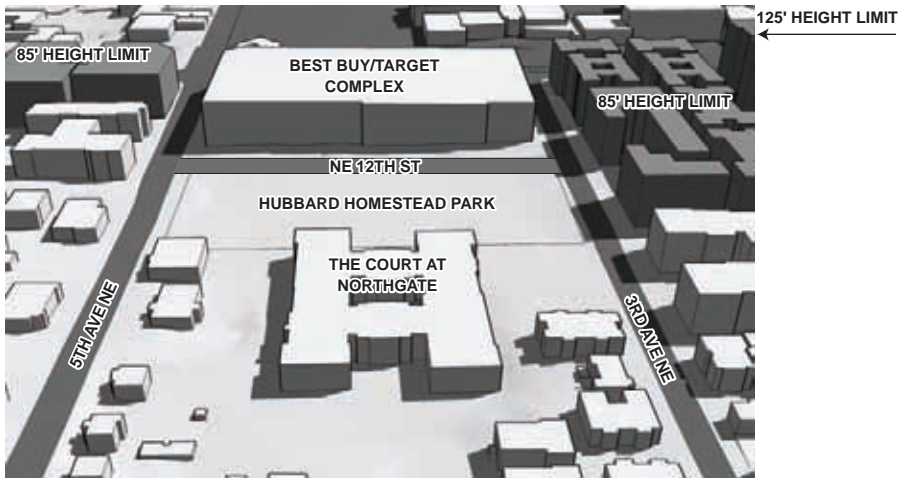
Full Shadow: 8:15pm

FILE NAME: FigB-2_CurrentZoning_BW.ai / UDF
 CREATED BY: JAB / DATE LAST UPDATED: 12/17/09

SOURCE: ESA Adolfsen, 2009.

Northgate Urban Center Rezone . 27112

Figure B-2
 Shadow Analysis: Current Zoning (June 1st)
 Seattle, WA



Start Shadow: 4:00pm



Half Shadow: 7:20pm



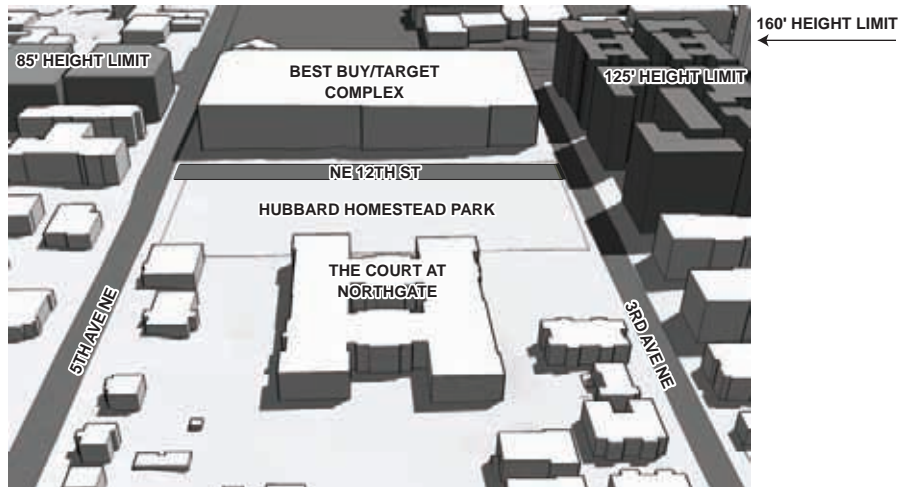
Full Shadow: 8:15pm

FILE NAME: FigB-3_BroadZoning_BW.ai / UDF
 CREATED BY: JAB / DATE LAST UPDATED: 12/18/09

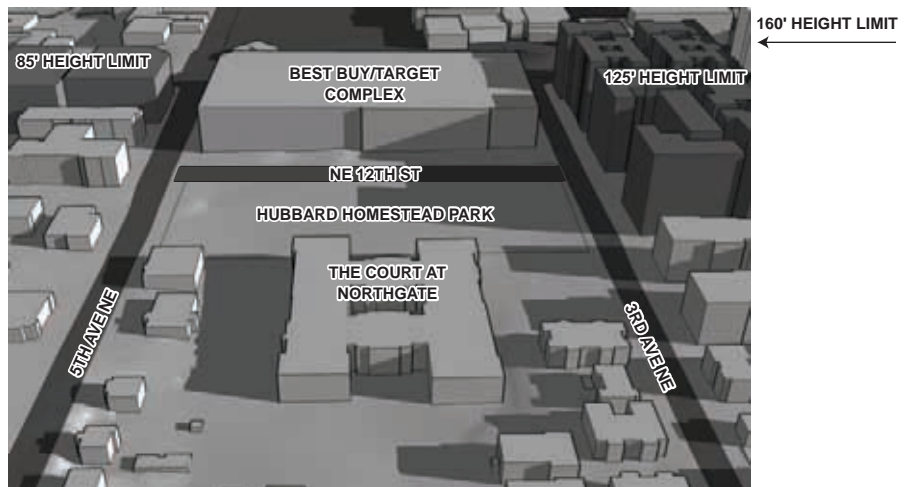
SOURCE: ESA Adolfsen, 2009.

Northgate Urban Center Rezone . 27112

Figure B-3
 Shadow Analysis: Broad Zoning (June 1st)
 Seattle, WA



Start Shadow: 3:00pm



Half Shadow: 6:50pm



Full Shadow: 8:15pm

FILE NAME: FigB-4_UDFZoning_BW.ai / UDF
 CREATED BY: JAB / DATE LAST UPDATED: 12/17/09

SOURCE: ESA Adolfsen, 2009.

Northgate Urban Center Rezone . 27112

Figure B-4
 Shadow Analysis: Alternative 3 Zoning (June 1st)
 Seattle, WA