



City of Seattle

Gregory J. Nickels, Mayor

Department of Planning and Development

D. M. Sugimura, Director

**CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR
OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

Project Number: 3007582
Address: 811 Fifth Avenue
Applicant: Carl Shumaker, Daniels Development Company

SUMMARY OF PROPOSED ACTION

Land Use Application to allow a 43-story, 798,000 sq. ft., office building with below-grade parking for approximately 291 vehicles. The existing Rainier Club and the sanctuary portion of the First United Methodist Church are to remain on site. The proposal includes the demolition of the office and services wing of the church located south of the sanctuary building. The Rainier Club would acquire some loading dock capacity and have parking for approximately 75 vehicles within the base of the new office tower.

The development site is comprised of the entire block bounded by Fifth Avenue on the east, by Columbia Street on the south, by Fourth Avenue on the west and Marion Street on the north.

The following approvals are required:

Design Review - Chapter 23.41 Seattle Municipal Code (SMC)

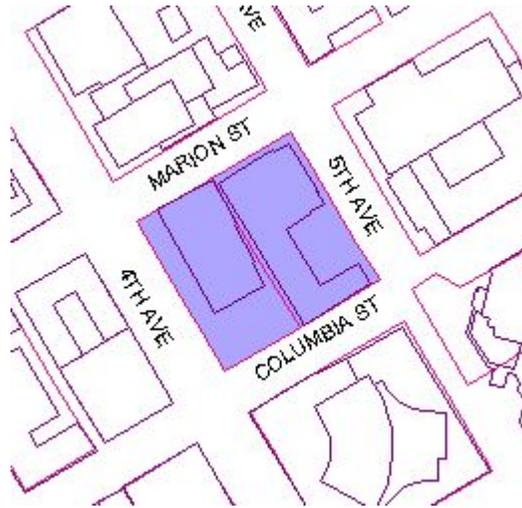
SEPA - Environmental Determination - Chapter 25.05, Seattle Municipal Code (SMC)

SEPA DETERMINATION: Exempt DNS MDNS EIS
 DNS with conditions
 DNS involving non-exempt grading, or demolition,
or another agency with jurisdiction.

An **Addendum** to the *Downtown Height & Density Changes EIS* and the *811 Fifth Avenue Project EIS*, prepared for the City of Seattle Department of Planning and Development, in compliance with SMC 25.05.625 and The State Environmental Policy Act. RCW 43.21C, WAC Chapter 197-11-620, was issued on January 7, 2008.

BACKGROUND INFORMATION:

The Downtown Seattle site consists of the entire block bounded by Marion Street on the north, Columbia Street on the south, 5th Avenue on the east and 4th Avenue on the west. The site measures approximately 240 feet in the north/south direction and 250 feet in the east/west direction. The total area is approximately 59,300 square feet in extent. Although originally platted with an alley intervening between 4th and 5th Avenues, the alley was vacated by ordinance before the turn of the last century. Currently there are two existing structures on the site which will remain, the Rainier Club and the sanctuary building of the First United Methodist Church. An office and service extension to the church sanctuary added in 1950, the "Education Wing," is proposed for demolition in order to accommodate the envisioned development.



The zoning is Downtown Office Core 1 (DOC1).

The current proposal is for the development of a 43 story, 798,000 square-foot office tower with below grade parking for 291 vehicles, to be constructed on the southeast corner of the site currently occupied by the office and service wing of the church.

The home of the Rainier Club, a social club founded in 1888, is located on the western half of the block. Built in 1904, with an extensive expansion in 1926-1929, was listed on the National Register of Historic Places and the Washington State Heritage Register in 1976. It became a City of Seattle Landmark in 1986. The sanctuary building of the First United Methodist Church, located on the northeast quadrant of the block, was nominated to become a Seattle Landmark in 1985. The designation was never approved since the nomination was appealed and the potential designation challenged in court.

An earlier MUP, # 2200399, was a proposal for a 33 story office tower occupying the eastern half block on Fifth Avenue, between Marion and Columbia streets. It went before the Downtown Design Review Board four times between July, 2002 and February, 2004. A Decision was published in July, 2004. Following an appeal and further activity in the Superior Court of the State of Washington, a Master Use Permit was issued by DPD in March of 2005. A component of that MUP was the demolition of the existing First United Methodist Church. The new proposal locates a forty-one story office tower at the southeast corner of the site and preserves the sanctuary portion of the FUMC.

Although Project #3007582 is a new Master Use Permit (MUP) for a new office tower at 811 5th Avenue, the project piggy-backs on an earlier issued MUP (#2200399) decision in that the Department of Planning and Development has determined that the new application can utilize the Early Design Guidance of the Downtown Design Review Board established for MUP #2200399.

The review of the current proposal commenced at the Recommendation stage of the Design Review process after application for the current MUP had been submitted to DPD.

As in the original proposal, the actual development site for the project is the entire block between Marion and Columbia streets and between 5th and 4th avenues. This includes, beside the FUMC sanctuary and service buildings, the western half block occupied by the Rainier Club, a designated Historic Landmark. Concurrently, the Rainier Club is proposing an addition to its facility. The addition to the Rainier Club is not part of this MUP nor is it under the purview of the Design Review Board but rather the Landmarks Board. A conceptual proposal for expanding the Club has been presented to the Board's Architectural Review Committee, but no final Board action on the Rainier Club expansion has occurred. The addition will be subject to its own MUP process should it exceed SEPA threshold requirements. A "for information-only" packet of background materials and drawings regarding the overall Rainier addition, prepared by the architecture firm NBBJ, was provided to the Design Review Board prior to the September 11, 2007 scheduled meeting of the Board.

Although the addition to the Rainier Club is not part of this MUP, underground parking servicing both the Club and the new office tower will be located under the existing parking lot just south of the Rainier Club structure, and this expansion is part of the current MUP.

The Seattle Department of Transportation has accepted a schematic plan whereby the curb line along the west side of Fifth Avenue would be extended into the existing roadway along the entire block between Marion Street and Columbia Street. This would bring the curb alignment in approximate conformity with the curb alignment of the block to the north and effectively eliminate one of the south bound lanes on Fifth Avenue.

Public Comments

Public comment was invited at an initial EIS scoping meeting held on January 7, 2003, during the Draft Environmental Impact Statement (DEIS) comment period which ran from January 5, 2004 until February 4, 2004 (extended to February 19, 2004), at a public forum conducted on January 28, 2004, for the 811 Fifth Avenue Project EIS. A comment period on the Addendum to the Downtown Height & Density Changes EIS and the 811 Fifth Avenue Project EIS began on January 7, 2008, and ended on January 22, 2008. Public comments from the two Design Review public meetings are noted within the Design Review process summaries which follow.

ANALYSIS—TRANSFER OF DEVELOPMENT RIGHTS (TDR)

The Land Use Code (SMC 23.49.011) sets base and minimum Floor Area Ratios (FAR) for lots in downtown zones. The project site is located within the Downtown Office Core 1 (DOC1) zone with a base FAR of 6 and a maximum FAR of 20. In the DOC1 zone the first increment of FAR above the base FAR must be achieved through a LEED® Silver Rating. Additional chargeable floor area above the first increment may be obtained only by qualifying for floor area bonus through qualifying performance and payment options as set forth in the Code.

The base FAR for the site is 59,277 square feet. The current proposal has opted to achieve the first increment of FAR by designing for and achieving certification of a minimum of a LEED® Silver Rating. An additional bonus FAR of 1.0 will be achieved through provisions for

maintaining a qualifying Landmark (Rainier Club) on site and an additional FAR of 0.50 for maintaining a “qualifying small structure” (the FUMC sanctuary building) on site.

Additional chargeable floor area up to 14.38 is proposed to be gained, in addition to that gained through the bonus provisions of SMC 23.49.011 and SMC 23.49.012, through the transfer of development rights provisions of SMC 23.49.014. Seventy five percent of the remaining chargeable floor area will be achieved through Housing TDR, for a total of 261,384 square feet, or 4.41 FAR; 12.5%, or 43, 564 square feet (0.735 FAR) will be achieved by using TDR from a sending lot with a major performing arts facility and an additional 12.5% by using TDR consistent with the restrictions of SMC 23.49.011.

Documentation validating the availability of TDR to this project shall be submitted to the DPD zoning reviewer prior to issuance of the Master Use Permit. Additionally, the calculation of any bonus development sought under the above provisions shall be identified, specified, and incorporated into the MUP plan sets prior to MUP issuance. Any requirements for documentation, execution of agreements, demonstration of valid transfer, and the recording of applicable instruments must occur before any construction permit, other than a shoring or foundation permit, is issued. Provided these requirements are all met, the bonus development allowed through the transfer of development is approved as conditioned below.

In addition, the project intends to mitigate for the lack of qualifying open space on site through the “payment in lieu” provision of SMC 23.49.016 D. The “payment in lieu” option for meeting the development standards for qualifying open space shall be identified, specified, and incorporated into the MUP plan sets prior to MUP issuance. In accord with SMC 23.49.017 D, the applicant must provide convincing documentation that the payment will contribute to improvements in the vicinity and in an amount sufficient to develop improvements that will meet the need for open space caused by the project and that the improvement is feasible within a reasonable time frame. All requirements for documentation, execution of agreements, demonstration of valid transfer, collection receipts and the recording of applicable instruments must occur before any construction permit, other than a shoring or foundation permit, is issued. Provided these requirements are all met, the payment in lieu for open space is approved as conditioned below.

ANALYSIS—DESIGN REVIEW

As noted above, DPD made the determination that, given the continuity of site and contextual conditions, the Early Design Guidance provided by the Downtown Design Review Board for MUP application 2200399 on July 9, 2002 and again on August 13, 2002, was still applicable to proposed development on the site. Following the MUP application, the current proposal was brought before the Downtown Design Review Board for its recommendation on September 11, 2007. On that date, in addition to recommending conditional approval of the overall design as proposed, the Board recommended approval of three requested departures from development standards. Subsequently, a more complete zoning review of the project identified two further departures from development standards needed for the proposed design, necessitating a second Recommendation Meeting which was held on January 8, 2008. At the second Recommendation Meeting the Board reaffirmed its approval of the design, its earlier approval of requested departures from development standards, and of approval of the two additional requested departures.

Early Design Guidance

After visiting the site, considering the analysis of the site and context provided by the applicants and hearing public comment, the Design Review Board members had earlier provided the siting and design guidance at two separate Design Review Early Design Guidance meetings, the first held on July 9, 2002, and the second held on August 13, 2002. At each of these meetings the Board members referenced the Design Guidelines of highest priority for the project as contained and described in the City of Seattle's *Design Review Guidelines for Downtown Development*, (April, 1999). The design review priorities identified by the Board as being of greatest importance and their specific comments were as follows.

Site Planning & Massing

Responding to the Larger Context

- A-1 Respond to the physical environment.
Develop an architectural concept and compose the building's massing in response to geographic conditions and patterns of urban form found beyond the immediate context of the building site.

- A-2 Enhance the skyline.
Design the upper portion of the building to promote visual interest and variety in the downtown skyline.

The Board pointed out that the subject site was surrounded by some of the tallest structures in the city and that the neighboring building -- Bank of America/Columbia Tower, Bank of America Plaza and Seattle Municipal Tower -- were each chamfered or setback in some manner. The Board agreed that this is pattern needed to be acknowledged either by complementing the setback patterns with a setback or contrasting by pushing towards the street to hold corner.

Architectural Expression

Relating to the Neighborhood Context

- B-1 Respond to the neighborhood context.
Develop an architectural concept and compose the major building elements to reinforce desirable urban features existing in the surrounding neighborhood.

The Board indicated, under this guideline, that they would like to see the verticality of the proposed structure expressed in order to lessen the perception that it was shorter than the surrounding structures.

- B-2 Create a transition in bulk & scale
Compose the massing of the building to create a transition to the height, bulk, and scale of development in neighboring or nearby less intensive zones.

- B-3 Reinforce the positive urban form & architectural attributes of the immediate area.
Consider the predominant attributes of the immediate neighborhood and reinforce desirable siting patterns, massing arrangements, and streetscape characteristics of nearby development.

- B-4 Design a well proportioned & unified building
Compose the massing and organize the publicly accessible interior and exterior spaces to create a well-proportioned building that exhibits a coherent architectural concept. Design the architectural elements and finish details to create a unified building, so that all components appear integral to the whole

The Board indicated that the design of the office tower should pay attention to the Rainier Club and acknowledge in some sense it's massing, architecture and historic value. The Board suggested that the base might have a different expression than the shaft in order to acknowledge the scale of the Rainier Club structure.

The Streetscape:

Creating the Pedestrian Environment

- C-3 Provide active - not blank – façades.
Buildings should not have large blank walls facing the street, especially near sidewalks.

The sloping east- west streets, Columbia and Marion, have pedestrian traffic and the Board expressed concern that there needed to be some interest for the pedestrian at sidewalk level. The Board acknowledged that this would not have to be storefront retail, but that the design should provide some street-level interest with minimal blank façade.

- C-2 Design façades of many scales
Design architectural features, fenestration patterns, and materials composition that refer to the scale of human activities contained within. Building facades should be composed of elements scaled to promote pedestrian comfort, safety, and orientation.
- C-5 Encourage overhead weather protection.
Encourage project applicants to provide continuous, well-lit, overhead weather protection to improve pedestrian comfort and safety along major pedestrian routes.

The Board encouraged overhead weather protection wherever possible. *The Board indicated they would like to see an expanded sidewalk on 5th Avenue with continuous overhead weather protection.*

Public Amenities

Enhancing the Streetscape & Open Space

- D-2 Enhance the building with landscaping.
Enhance the building and site with substantial landscaping-which includes special pavements, trellises, screen walls, planters and site furniture, as well as living plant material.
- D-3 Provide elements that define the place.
Provide special elements on the façade, within public open spaces, or on the sidewalk to create a distinct, attractive, and memorable “sense of place” associated with the building.

The Board discussed how the design could incorporate a commemoration of the past history and church at the site. Suggestions included commemorative drawings, including remnants of the historic church into the design of the new, inclusion of a plaque, or the like.

Vehicular Access & Parking

Minimizing the Adverse Impacts

E-2 Integrate parking facilities.

Minimize the visual impact of parking by integrating parking facilities with surrounding development. Incorporate architectural treatments of suitable landscaping to provide for the safety and comfort of people using the facility as well as those walking by.

Recommendation Meeting, September 11, 2007

Architect's Presentation

Allyn Stellmacher of the architectural firm of ZGF presented the proposal on behalf of the development team after briefly recounting the project's goals and priorities, as well as the neighborhood and contextual analysis, including the expansion plans of the Rainier Club. A major challenge for the designers was the need to achieve a viable office floor plate given a site footprint limited by the two historic buildings which were to be retained on site. The solution was to increase the size of the floor plates as the building moved upward, meaning that the upper levels of the proposed structure must lean over the tops of the Rainier Club and the church sanctuary. Having dismissed the idea of relying on basic cantilevers to increase the size of the floor plates, the design development had explored three different design directions, what were identified as "curved," "canted" and "faceted" massing alternatives. The preferred and proposed design was the "faceted" expression which incorporated a lateral structural bracing system at the perimeter of the building. This solution allowed for the expanded floor plates extending into the air space above the existing sanctuary and the expanded area of the Rainier Club and resulted in a unique and dynamic formal expression to the proposed tower. The top of the building would constitute another distinctive facet and one intended to incorporate alternative on-site power generating capacities.

Following the design team's presentation, the Board asked several questions, among which answers from the design team were the following clarifications:

- The east-west orientation of the main lobby and elevator core provided for a better alignment with below-grade loading and vehicle circulation and allowed the core to stand further away from the south façade of the sanctuary;
- The variance for providing less than the code-required open space was necessary since, among other restrictions, the court between the church and tower did not qualify as open space since it would be "covered" and the Code did not provide for a Design Review departure from the requirement.;
- The peripheral diagonal bracing was driven by structural logic since seismic bracing systems that were based upon the core only would demand a prohibitively thick core-wall thickness.

Public Comments:

Comments solicited from the public included the following:

- A representative of the Seattle Community Council Federation: Opposed any cantilever over the church because of the need to maintain the historical character of the building; noted that the current building access to the church from both Marion St. and 5th Ave. should be maintained.

- The great, great grandson of church architect James Schack, indicated he would like to see the tension relieved between the church wall and tower façade and suggested using cues from church to inform the treatment of the tower base and ground plane and court to achieve a more tactile and intimate environment.
- The president of the group, Save Our Sanctuary, applauded the saving of the sanctuary and indicated it should be preserved for some public use with deep civic importance
- Another member of the same group urged that the tower not block views of the dome of the existing sanctuary and that the development team work earnestly to make the courtyard a special, public space.
- Another member of the public affirmed the judgment that the proximity of the tower's north facade to the south wall of the church needed relief, i.e. greater separation; commended the Design team in its attitude of respect for historic structures, and stressed that addressing the above situation should be made integral to that attitude; commented that, although DPD standards might be overly prescriptive, there should be a concern about the length of the façade requested as a departure from the requirement.
- Another member of the public commented that the proposed courtyard between the tower lobby and church has potential to be a grand space connecting the new and the old, but that it should be a public space.
- A written comment received by DPD asked that the 65-foot tall sequoia growing at the site be integrated into the design or saved and moved elsewhere.

Board's Deliberations:

The Board chair commended the design team on the quality of the analysis and presentation in the packet that been prepared for the meeting and on the clear, rational presentation at the meeting itself. That the sanctuary was to be saved and that the parking would be located below grade were components of the design that were to be applauded. Various Board members noted their satisfaction with the tower itself, with the choice in structural system and the choices made for the architectural expression of larger facets at the skin of the structure. The perimeter structural bracing created a sense of "increasing velocity" as the tower extended skyward; where the diagonal braces met the grade at the northeast corner of the structure, at the narrow courtyard created between the new structure and the existing south façade of the church, they formed a portal into the space that was potentially dramatic.

What the Board found still unresolved in the design and in need of further exploration was twofold: first, the integration of elements and expression at the rooftop, especially as the rooftop facet would be perceived from the surrounding vistas, including the streets, and second, and most important, how, as one Board member put it, the "pure, clean volume of the tower" set itself down "amidst the miscellany at its base."

In general, the tall, light-weight transparent base-volume of the tower was thought to work well vis-à-vis the adjacent historic structures. Nonetheless, the attempt by the design team to maintain viable floor plates while providing for an adequate separation between the skin of the tower on its north side and the south façade of the church structure produced, in the judgment of the Board members, an inadequate separation as presented. The pinching and restricting of the interval of space between the two façades produced a sense of clash that was both aesthetically jarring and slightly vertiginous. It was clear that there was still a need for the design team to

explore strategies for creating a greater gap between facades and to investigate in greater detail ways of getting more light into the space and, finally and importantly, creating within this 5th Avenue street wall interstice a unique and engaging urban space, one filled with delight and a sense of vibrant drama.

Departures from Development Standards

The architect identified the following departures from development standards needed for the proposed development:

- SMC 23.49.058: to exceed the upper level façade length limits of the tower—between 161 and 240 feet, allowed 125 feet, requested 139 feet; between 241 and 500 feet, allowed 100 feet, requested 137 feet five inches; above 500 feet, allowed 80 feet, requested 125 feet 5 inches.
- SMC 23.49.018D: to allow overhead weather protection that exceeds a maximum of fifteen (15) feet above the sidewalk.
- [SMC 23.54.035: required number of loading berths to be reduced from 8 to 7.]
- [SMC 23.54.035: reduce required length of loading berths from 35 to 25 feet]

Staff noted that the reduction in length of the loading berths was an administrative decision of the Director and not a subject for departure. In addition, the Board could not grant a departure from the required number of loading berths but that they could grant a departure for one of the eight loading berths to be less than the minimum 25 feet in length, in effect to be a regular vehicle space dedicated for loading only. Thus, the third requested departure should be: SMC 23.54.035: departure to allow one loading space to be less than twenty five (25) feet in length.

Having visited the site, having considered the analysis of the site and context provided by the proponents, having solicited public comment regarding the proposal, and having addressed their major concerns regarding the proposal, the Design Review Board members recommended conditional approval of the design of the proposal and approval of the requested departures from development standards as corrected above to three. The condition of approval was that the design team would continue to work with the Land Use planner at DPD to: 1) address the Board's concerns regarding the top facet of the tower as the actual rooftop components are determined, 2) to arrive at a satisfactory strategy to allow for a greater separation between the north façade of the new tower and the existing south façade of the church structure, and 3) to arrive at a design for the courtyard between tower and church that provided a vibrant, inviting space that met the expectations regarding the space that had been voiced at the meeting.

Recommendation Meeting, January 8, 2008

Architect's Presentation

Allyn Stellmacher of the architectural firm of ZGF again presented the proposal on behalf of the development team. He briefly recounted the status of the proposal following the previous presentation to the Board: the overall design of the proposal was recommended for conditional approval by the Board, as were the three departures from development standards that had been requested by the development team. Subsequently, a more complete zoning review of the project

identified two further departures from development standards needed for the proposed design, thus necessitating this second Recommendation Meeting.

Each of the additional departure requests were related to the proposed “living” wall along the lower portion of the Columbia Street façade. The departures were from the requirements of SMC 23.49.056 C (“Façade Transparency Requirements”) and SMC 23.49.056 D (“Blank Façade Limits”).

The entire podium façade arising from the sidewalk level to a height of approximately twenty feet at its western limit would be covered, except for the garage-entry opening, by a vertical garden system where individual plants of different species would be inserted into a growth medium contained within irrigated panels attached to a frame that was affixed to the wall. This system would permit not only visual variegation to elicit pedestrian involvement but allow for aromatics which would enhance that experience. The proposed vertical garden system would continue around the southwest corner of the base structure and cover the exposed lower western base façade.

Following the design team’s presentation of particulars relating to the “living wall,” the architect explained that an agreement had been reached with the Rainier Club which would limit the height of their expansion. This would allow greater amounts of light to enter the office tower multi-floor lobby area as well as the open space proposed between the office tower and the church sanctuary.

In addition, the design team took the opportunity to update the Board on elements of the design that had been less than adequately resolved and were the subjects of the Board’s conditioning.

The condition of approval had been that the design team would continue to work with the Land Use planner at DPD to: 1) address the Board’s concerns regarding the top facet of the tower as the actual rooftop components are determined, 2) to arrive at a satisfactory strategy to allow for a greater separation between the north façade of the new tower and the existing south façade of the church structure, and 3) to arrive at a design for the courtyard between tower and church that provided a vibrant, inviting space that met the expectations regarding the space that had been voiced at the meeting. Schematic plans were shown of the rooftop with two, center-hinged planes, one covered with photovoltaic panels, the other screening the rooftop mechanical equipment. At the center of the rooftop and at the tilted planes’ hinged edge there would be a nest for a crane with telescoping vertical and horizontal components from which would be hung a window-washer’s basket. The transparent lobby base had been extended upward resulting in a clearer demarcation line and separation perceptible between the office tower and the south façade of the existing sanctuary. The interstitial space at grade between new tower and sanctuary was described as still schematic, but the lowered potential height of the Rainier Club, it was noted, would allow greater natural light illumination of the space. In addition, it noted that it was the developer’s intention to incorporate a substantial sculptural art component within the design of the space.

Public Comments:

Comments solicited from the public included the following:

- One member of the public, representing the Seattle Community Council Federation, noted, among other concerns, that the public access to the sanctuary and human service uses on site should be maintained;
- Another member of the public, representing the group, Save Our Sanctuary, commented on the “elegant design” that had been presented and reiterated the comment made at the earlier recommendation meeting, that the church sanctuary building should be preserved for some public use, specifically as a ceremonial space for downtown;
- Another member of the public, identifying himself as about to assume the role of the new pastor of the First United Methodist Church congregation, noted that the “living wall” was well suited to the Columbia Street environment and that the proposed tower was a gorgeous addition to the downtown skyline;
- Another member of the public commented that he was pleased with the overall design of the office tower and noted that the living wall was a great creative opportunity and that he was in support of the Board’s recommending approval of the requested departures.

Board’s Deliberations:

The Board chair commended the design team on the quality of the analysis and presentation in the packet that been prepared for the meeting and on the clear, rational presentation at the meeting itself. Various Board members noted their satisfaction with the tower itself, with the choice in structural system and the choices made for the architectural expression of larger facets at the skin of the structure.

Raising the already tall, transparent base-volume of the tower was thought to work well to differentiate the new office tower from the existing church sanctuary building, but the Board still had concerns regarding the light available within the volume and the challenge of achieving a comfortable human scale within the space. A question remained whether, given the structural elements of the tower, the pedestrian entry into the space from the sidewalk on Fifth Avenue, the interior might be perceived as too daunting. Another area the Board urged for more study was whether the water element running along the side of the sanctuary structure overly narrowed the available footpath within a space that was already disproportionately narrow in relation to its height.

Departures from Development Standards

At the September 11, 2007 meeting the Design Review Board members recommended approval of three requested departures from development standards:

- SMC 23.49.058: to exceed the upper level façade length limits of the tower—between 161 and 240 feet, allowed 125 feet, requested 139 feet; between 241 and 500 feet, allowed 100 feet, requested 137 feet five inches; above 500 feet, allowed 80 feet, requested 125 feet 5 inches.
- SMC 23.49.018D: to allow overhead weather protection that exceeds a maximum of fifteen (15) feet above the sidewalk.
- SMC 23.54.035: reduce required length of loading berths from 35 to 25 feet

The additional departures identified were the following:

- SMC 23.49.056D: to allow a blank façade to exceed 30 feet in width of a Class II Pedestrian Street.
- SMC 23.49.056C: to provide less than 25 percent of the area between four and eight feet measured vertically from the sidewalk along the Columbia Street façade as transparent.

The departure from "blank facade limits" is to allow any portion of the sidewalk-level street facing facade along Columbia St to exceed thirty feet in width. By definition a "blank facade" is "any portion of a facade that is not transparent."

"Facade transparency," a separate development standard, would require, in this instance, since Columbia Street is a Class II pedestrian street and since the slope exceeds 7 1/2 % slope, that 25 percent of the area between four and eight feet measured vertically above the sidewalk be transparent, i.e., allow views into the interior of the building or be display windows.

The alternative being proposed, which was the primary focus of the evening's presentation, was a "living" green wall, with no transparency provided. The question weighed by the Board was whether the applicant had demonstrated that this design solution "better meets the intent of the adopted guidelines," among which the following were identified: A-1 responding to the physical environment and the specific site constraints, C-1, promoting pedestrian interaction, C-3, providing for active rather than blank facades, D-2 enhancing the building with landscaping.

The Board members were agreed that the proposed "living wall" was a commendable design solution, one that the applicants had demonstrated better met the intent of the design guidelines and one that warranted the granting of departures from the requirements of SMC 23.48.056C and SMC 23.49.056D. The four members of the Board present unanimously agreed that the additional departure requests should be recommended to the Director for approval.

DECISION - DESIGN REVIEW

The Director of DPD has reviewed the recommendations of the four Design Review Board members present at the Downtown Design Review Board meeting held on January 8, 2008, and finds that they are consistent with the City of Seattle *Design Review Guidelines for Downtown Development* and that the development standard departures present an improved design solution, which better meets the intent of the Design Guidelines, than would be obtained through strict application of the Seattle Land Use Code.

Therefore, the proposed **design is approved** as presented at the January 8, 2008 Downtown Design Review Board meeting with the recommended development standard **departures** described above also **approved**, subject to the conditions, enumerated below.

ANALYSIS - SEPA

DPD has determined that for SEPA compliance associated with proposed development, it is appropriate to adopt the *Downtown Height & Density EIS* (November, 2003) and the *811 Fifth Avenue EIS* (April, 2004) and to prepare an EIS addendum to add project-specific information. This analysis relies on the document, *First United Methodist Church Development*, an

Addendum to the *Downtown Height & Density Changes EIS* and the *811 Fifth Avenue Project EIS*, issued on January 7, 2008, by the lead agency, the City of Seattle Department of Planning and Development as well as on the earlier adopted EIS documents. These environmental documents put forward the probable and significant adverse impacts likely to be created by the proposal. This decision also makes reference to and incorporates the project plans and other supporting documentation submitted with the project.

The Seattle SEPA ordinance provides substantive authority to require mitigation of adverse impacts resulting from a project (SMC 25.05.655 and 25.05.660). Mitigation, when required, must be related to specific adverse environmental impacts identified in an environmental document and may be imposed only to the extent that an impact is attributable to the proposal. Additionally, mitigation may be required only when based on policies, plans, and regulations as enunciated in SMC 25.05.665 to SMC 25.05.675, inclusive, (SEPA Overview Policy, SEPA Cumulative Impacts Policy, and SEPA Specific Environmental Policies). In some instances, local, state, or federal requirements will provide sufficient mitigation of a significant impact and the decision maker is required to consider the applicable requirement(s) and their effect on the impacts of the proposal.

The SEPA Overview Policy (SMC 25.05.665) clarifies the relationship between codes, policies, and environmental review. Specific policies for each element of the environment, certain neighborhood plans, and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority. The Overview Policy states in part: "*where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation,*" subject to some limitations. Under specific circumstances (SMC 25.05.665 D 1-7) mitigation can be required.

Proposal

The proposed *First United Methodist Church Development* would involve construction of a 43-story commercial office building on the south portion of the east half-block with preservation of the existing church sanctuary on the north portion of the half block. Chargeable gross floor area associated with new construction under this proposal would total approximately 783, 000 square feet.

Three points of access to eight levels of below-grade parking will be provided would be located near mid block along both Marion and Columbia Streets as well as from the parking plaza south of the Rainier Club which has access via a curb cut on Columbia Street. Truck loading for the Rainier Club would be accomplished through a new loading dock within the base of the new office tower, and parking accessory to the Club, for approximately 75 vehicles, would be provided in the subterranean parking of the new tower and accessed through the existing parking plaza off Columbia Street.

This project is expected to have both short and long term impacts and a more detailed discussion of some of the impacts is appropriate.

Short-term (Construction-Related) Impacts

Traffic and Parking

Excavation of the proposed underground parking garage would extend approximately 65 feet below existing grade on the east half of the block. Little excavation is anticipated on the west half of the block. Overall, it is anticipated that the proposal would require excavation of approximately 80,000 cubic yards of expanded material, none of which is to be stockpiled on site. The 80,000 cubic yards of expanded material would be exported to an as yet undetermined site. It is estimated that this amount of earthwork would generate approximately 4000 outbound truck trips or 8,000 total truck trips over an estimated 3 months time-frame associated with the work. This could equate to 95 round trip truck trips per day. Excavation stage construction traffic will cause inconvenience to properties located near the site, and to motorists and pedestrians on surrounding streets. During the construction phase, large trucks will regularly deliver machinery, construction equipment and materials to the site. A significant concentration of deliveries of concrete will occur early in the overall construction schedule in conjunction with construction of the below-grade parking levels of the structure, declining somewhat in intensity relative to core and floor construction process. Structural steel deliveries will occur throughout the fabrication process. Truck trips related to excavation and construction are expected to be spaced in time as they either load material and depart or arrive from various locations. These trips are not expected to have a negative affect upon transportation levels of service on the surrounding street and highway system. Staging of trucks in immediate site proximity during excavation and concrete pouring has the potential for localized traffic disruptions. Existing regulatory authority in place with Seattle Department of Transportation (SDOT) allows for adequate control through permitting review of use of surrounding streets to mitigate these potential impacts without any exercise of SEPA authority.

Arrival of workers is expected to occur in early a.m. hours, prior to peak traffic periods on surrounding streets. Likewise, their departure is expected to occur during afternoon hours, prior to p.m. peak traffic periods. During project construction, the labor workforce is estimated to peak at 300 workers per day. This would occur when the building shell is complete and numerous building trades are on the site simultaneously. There are public parking lots and facilities within the general vicinity and within walking distance across Interstate 5 to the east. Once the building skin is attached and fire protection systems activated, the contractor shall be required to pursue limited occupancy of the on-site parking garage to accommodate construction parking. This management of construction workers' parking shall be incorporated into a required Construction/Noise Impact Management Plan.

Public sidewalks are found on four abutting rights-of-way. Marion Street, Fifth Avenue, and Columbia Street will be particularly affected by the proposed construction on site. Since the safe, convenient and comfortable movement of pedestrians is an essential and indispensable function of the public right-of-way, especially in this downtown location, SEPA policy authority will be employed to require the sidewalks along the project site be kept open and safely passable throughout the construction period. A determination by SDOT that temporary closure of a sidewalk for structural modification or other purposes shall overrule this condition.

Excavation

Excavation to provide 8 levels of underground parking will create potential earth-related impacts. Compliance with the Stormwater, Grading, and Drainage Control Code (SMC 22.800) will require the proponent to identify a legal disposal site for excavation and demolition debris prior to commencement of demolition/construction. Cleanup actions and disposal of contaminated soils on site will be performed in compliance with the Model Toxics Control Act (MTCA; WAC 173-340). Compliance with the Uniform Building Code (or International Building Code) and the Stormwater Grading and Drainage Control Code will also require that Best Management Practices (BMPs) be employed during demolition/excavation/construction including that the soils be contained on-site and that the excavation slopes be suitably shored and retained in order to mitigate potential water runoff and erosion impacts during excavation and general site work. Groundwater, if encountered, will be removed from the excavation by sump pumping or by dewatering system and routed to existing storm drain systems. A drainage control plan, including a temporary erosion and sedimentation control plan and a detention with controlled release system will be required with the building permit application. In addition, a Shoring and Excavation Permit will be required by SDOT prior to issuance of a building permit. Compliance with the requirements described above will provide sufficient mitigation for the anticipated earth-related impacts. Therefore, no mitigation of earth-related impacts pursuant to SEPA authority is warranted.

Noise-Related Impacts

Residential, office, and commercial uses in the vicinity of the proposal will experience increased noise impacts during the different phases of construction (demolition, shoring, excavation). Compliance with the Noise Ordinance (SMC 22.08) is required and will limit the use of loud equipment registering 60 dBA or more at the receiving property line or 50 feet to the hours between 7:00 a.m. and 10:00 p.m. on weekdays, and between 9:00 a.m. and 10:00 p.m. on weekends and holidays.

Although compliance with the Noise Ordinance is required, additional measures to mitigate the anticipated noise impacts may be necessary. The SEPA Policies at SMC 25.05.675.B and 25.05.665 allow the Director to require additional mitigating measures to further address adverse noise impacts during construction. Pursuant to these policies, it is Department's conclusion that limiting hours of construction beyond the requirements of the Noise Ordinance may be necessary. However, it is also recognized that some construction-related activities (e.g., surveying and layout, stocking the building, testing and tensioning of post-tension cables, etc.) will generate little or no noise, and could substantially shorten the construction schedule. In addition, therefore, as a condition of approval, the proponent will be required to limit the hours of construction activity not conducted entirely within an enclosed structure to non-holiday weekdays between 7:00 a.m. and 9:00 p.m. and on Saturdays between 9:00 a.m. and 6:00 p.m.

The Department recognizes there may be occasions when critical construction activities or those of an emergency nature, related to safety or traffic issues, may need to be completed after regular construction hours as conditioned herein. Therefore, the Department reserves the right to allow work to take place which exceeds the above noise generation restrictions either with regard to time limits or noise intensity levels. Such work must be approved by the Department on a case-by-case basis and, except in the case of bonafide emergencies, requests for these allowances should be made at least three days before being allowed to occur.

The Department also recognizes that in some cases work after normal hours could lessen traffic impacts or could substantially shorten the total construction time frame, and hence the duration of some impacts. Excavation below grade, below grade cement-pouring foundation work, and other construction activities with proper impact reducing technologies and management practices in place may be candidates for after-hours work and may be allowed if set forth in the approved Construction/Noise Impact Management Plan prepared and submitted for DPD approval before any phase of the construction begins.

Air Quality Impacts

Construction will create dust, leading to an increase in the level of suspended air particulates, which could be carried by wind out of the construction area. Compliance with the Street Use Ordinance (SMC 15.22.060) will require the contractors to water the site or use other dust palliative, as necessary, to reduce airborne dust. In addition, compliance with the Puget Sound Clean Air Agency regulations will require activities, which produce airborne materials or other pollutant elements to be contained with temporary enclosure. Other potential sources of dust would be soil blowing from uncovered dump trucks and soil carried out of the construction area by vehicle frames and tires; this soil could be deposited on adjacent streets and become airborne. The Street Use Ordinance also requires the use of tarps to cover the excavation material while in transit, and the clean up of adjacent roadways and sidewalks periodically. Construction traffic and equipment are likely to produce carbon monoxide and other exhaust fumes. Regarding asbestos, Federal Law requires the filing of a Notice of Construction with the Puget Sound Clean Air Agency ("PSCAA") prior to demolition. Thus, as a condition of approval prior to demolition, the proponent will be required to submit a copy of the required notice to PSCAA. If asbestos is present on the site, PSCAA, the Department of Labor and Industry, and EPA regulations will provide for the safe removal and disposal of asbestos.

Long-Term Impacts - Use-Related Impacts

Land Use

The proposed project, with its office, retail, private club, and religious facility uses, is consistent with the City of Seattle Comprehensive Plan (1994) and existing land use policies regarding downtown development.

Transportation

A comprehensive transportation and parking impact analysis was performed as part of the *811 Fifth Avenue Project EIS* and included as Appendix 4 of that study. The *Addendum* (January, 2008) amended and updated the earlier analysis (pp.78-82). Elements of the Transportation Analysis prepared by Heffron Transportation, Inc. for the proposal were determined by DPD to establish the study area, and the key traffic issues.

Traffic

Over the long-term, vehicular and pedestrian traffic will increase as a result of this proposal. Demand upon general area transportation systems, including transit, will also increase. A Transportation Impact Study prepared by Heffron Transportation, and dated October 16, 2003, is included as Appendix 4 of the *Draft Environmental Impact Statement for the 811 Fifth Avenue*

Project (see *Volume II, Appendices*). Section G of the *Addendum* (pp.77-82) amends and updates the analysis performed for the previous study. One of the biggest differences between the new proposal and the project under MUP 2200399 is the reduction in the number of provided parking spaces, then proposed at 538, now proposed at 291.

The earlier Transportation Impact Study looked at both trip-generation estimates and estimates of impacts on existing intersections. With the reduced number of parking spaces, the peak-hour off-site impacts were judged to be the same or less than those previously evaluated.

Nine intersections in the project year (2006) were examined in the earlier Transportation Impact Study. Inclusion of project related traffic (with 538 parking stalls) would have added an estimated 1,980 daily vehicle trips to surrounding streets, with 303 in the AM peak hour and 295 in the PM peak hour. In the AM peak hour the project would add traffic to one intersection which the baseline level of service for 2006 foresees as performing at Level of Service (“LOS”) F, namely 5th Avenue at Columbia Street. Project traffic destined to the project’s entrance driveway would degrade operations of this intersection from LOS D to LOS F. During the PM peak hour the project would add traffic to two intersections which the baseline level of service for 2006 foresees as performing at LOS E, namely 5th Avenue and James Street and 6th Avenue and James Street. Given the high volume of commute traffic and their proximity to the I-5 ramps, it is not unusual that these signalized intersections would experience high vehicle delay and volume-to-capacity (v/c) ratios. But the project traffic would increase these v/c ratios only incrementally at any one of the three locations and would be proportional to the project’s share of total entering traffic at these locations. Project impacts would not be substantial, it was concluded, in comparison to the baseline condition without-project traffic.

Several of the study intersections were expected to continue to operate at the same Level of Service (LOS) without and with the proposed project. Assuming no changes to intersection geometry or signal timings, the proposed project would, as noted, degrade operations at one intersection: the 5th Avenue/Columbia Street intersection at AM peak hour, which is expected to degrade from a LOS D to LOS F with the proposed project. The drop in level of service is the result of the additional traffic on various movements and the constraints of the fixed-time signal system. The Heffron Transportation Analysis suggested that the periodic update by the City of the signal timing of all signals in the downtown grid should reduce the delay at this intersection. Three intersections would operate at LOS E: the 7th Avenue and Madison intersection during the AM peak hour, the 6th Avenue/ Spring Street intersection during the PM peak hour, and the 6th Avenue/James Street intersection during the PM peak hour. The project was not expected to change the level of service of any of these intersections and mitigation was not recommended for them. The update in the *Addendum* states that “the trip generation analysis for the proposed [new] project would generate fewer trips” than the program previously evaluated. “The proposed project would generate more daily trips” higher vehicle use being assumed for midday trips] “than previously evaluated, but fewer commute trips. The peak hour off-site trips would be the same or less than those previously evaluated.”

A Traffic Management Program (“TMP”) is a proven and effective means to reduce the project’s trip generation and thus minimize potential traffic and parking-related impacts. In order to mitigate both traffic and parking impacts a Transportation Management Program shall be required pursuant to SEPA policy authority. MUP 2200399 set the condition that the TMP should have the goal of reducing the number of office workers coming to the office building by single occupancy vehicles to no more than 33%. This project shall be conditioned to lower the

TMP goal to 20% single occupancy vehicle (SOV) trips The Program shall comply with Director's Rule 14-2002, or whatever Director's Rule is in effect at the time a building permit is applied for. The TMP shall be submitted for review to DPD and SDOT prior to issuance of any construction period related to the project. This measure, combined with the intersection-specific measure would collectively reduce the degree of project impacts.

Transportation Concurrency

The City of Seattle has implemented a Transportation Concurrency system to comply with one of the requirements of the Washington State Growth Management Act (GMA). The system, described in DPD's Director's Rule 4-99 and the City's Land Use Code is designed to provide a mechanism that determines whether adequate transportation facilities would be available "concurrent" with proposed development projects. There were four screenlines included in the 811 Fifth Avenue Project EIS analysis. Based on that analysis, the small number of trips that the proposed project would add to each of the screenlines would not cause the LOS standard to be exceeded. No further mitigation is required.

Parking

Parking would be provided on-site within a new underground garage providing 291 stalls. Approximately 75 of these spaces would be allocated to the Rainier Club for use during the day. For nighttime and weekend Club events adequate parking should be available.

A parking demand analysis was included within the Heffron Transportation, Inc. Transportation Analysis (October 16, 2003) to determine the peak demand expected to be generated by the proposed office and retail uses on site and to determine how closely the proposed number of parking spaces would match the anticipated parking demand. Information in the Institute of Transportation Engineers (ITE) *Parking Generation* tables and distributed throughout the day using distribution patterns from the Urban Land Institute to estimate a total peak parking demand of 538 spaces. Subtracting the 75 spaces allocated to the Rainier Club for daytime use, the parking supply available for office, church and retail uses on weekdays would be 463 spaces, or exactly 75 spaces short of peak demand. The study suggests that because peak parking periods are different, it might be possible for the office and Rainier Club to share parking spaces. This could be accomplished by assigning a certain number of spaces for short-term visitor parking and reserving them between 11:00 a.m. and 1:00 p.m. for Rainier Club Members. If parking could be shared, the total on-site parking deficit would be reduced to 26 vehicles.

Currently the Rainier Club provides valet parking through utilization of off-site parking garages. With completion of the construction of this proposal the Rainier Club would no longer need use of the off-site parking spaces. Any overflow associated with the office and retail uses would be offset by elimination of overflow parking of the existing Rainier Club. During weekday evenings and on weekends, project parking demand would be accommodated by the parking garage supply. A Transportation Management Program (TMP) could also contribute to reduce single-occupant commute trips, which would reduce peak parking demand. Since a shared parking agreement between the office tower and the Rainier Club would address most directly and immediately the impact of parking demand in the area, SEPA policy authority will be used to condition the proposal for the parties to enter into a shared parking agreement which will reduce parking shortage impacts by utilizing the Rainier Club spaces to their fullest capacity.

Historic Buildings

The First United Methodist Church is not listed on the State or National Registers of Historic Places. It was nominated to become a City of Seattle Landmark in February, 1985, but the nomination was never approved, as the nomination was appealed by the Church and the potential designation challenged in court. The Washington State Supreme Court issued a ruling on May 9, 1996, *First United Methodist Church v. Hearing Examiner*, 129 Wn.2d238 (1995), and held that in imposing Landmark status on the Church building the City of Seattle Landmarks Board imposed an unconstitutional burden on the Church's right to free exercise of religion. It is anticipated that upon transfer of the church property and buildings from church ownership the original sanctuary portion of the church building will be nominated and designated as a Landmark structure.

The Rainier Club is a designated City of Seattle Landmark. As a part of the City of Seattle's adopted SEPA legislation, the City requires that the impact of a project adjacent to, across the street from, or abutting a City landmark be evaluated (SMC Chapter 25.05.675). In accord with this provision, DPD has referred plans for the development on the Rainier Club/ FUMC site to the City's Historic Preservation Officer for adjacency review and approval.

The Rainier Club is a designated Landmark in the City of Seattle. As such, the proposed additions to the Rainier Club will require a *Certificate of Approval* from the Seattle Landmarks Preservation Board. Alterations to the Rainier Club are further guided by the Club's agreement with the City on "Controls and Incentives." The Rainier Club is also listed on the National Register of Historic Places and Washington Heritage Register. Alterations to the structure, therefore, must meet the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. The Seattle Landmarks Preservation Board, as decision-makers within a Certified Local Government, will make recommendations of the appropriateness of any planned alterations to listed structures on behalf of the Washington State Office of Archaeology & Historic Preservation. A Certificate of Approval for the Rainier Club addition will have to be obtained from the Landmarks Preservation Board prior to issuance of a Master Use Permit for the addition. No further mitigation under SEPA authority is appropriate or required.

DECISION – SEPA

This decision was made after review of the *Draft and Final EIS for the 811 Fifth Avenue Project*, the *Downtown Height and Density Changes EIS*, the *Addendum to the Downtown Height & Density Changes EIS* and the *811 Fifth Avenue Project EIS* as well as other information on file with the Department. This action constitutes the lead agency's final decision and has been signed by the responsible official on behalf of the lead agency. Pursuant to State and Local environmental regulations, alternatives to the proposed action meeting the applicants' objectives were considered. All information relied on by the Department and responsible official concerning the proposal and the alternatives is and has been available to the public.

DPD finds that **the proposed development** including mitigation measures proposed by the applicant or imposed as conditions of the Master Use Permit would be reasonably compatible with existing land uses and the City's land use and environmental policies, and is **conditionally approved**.

NON-APPEALABLE ZONING CONDITIONS

Prior to Issuance of a Master Use Permit

1. The applicant shall satisfactorily respond to all zoning corrections listed in the zoning correction letter issued by Ed Manlangit on October 25, 2007, and shall update MUP plan sets accordingly.
2. The applicant shall provide for review all required documentation regarding the transfer of development credits and payment in lieu for open space to the zoning reviewer (Ed Manlangit).

Prior to Issuance of Any Construction Permit Other than a Shoring/Foundation Permit

3. The applicant shall submit for review to the zoning plans examiner (Ed Manlangit) any and all requirements of documentation, execution of agreements, demonstration of valid transfer, and the recording of applicable instruments pertaining to the Transfer of Development Rights and payment in lieu for Open Space.

CONDITIONS - DESIGN REVIEW

Non-Appealable Conditions-Design Review

4. Any proposed changes to the exterior of the building or to the site or must be submitted to DPD for review and approval by the Land Use Planner (Michael Dorcy, 615-1393). Any proposed changes to the improvements in the public right-of-way must be submitted to DPD and SDOT for review and for final approval by SDOT.
5. Compliance with all images and text on the MUP drawings, design review meeting guidelines and approved design features and elements (including exterior materials, landscaping and ROW improvements) shall be verified by the DPD planner assigned to this project (Michael Dorcy, 615-1393), or by the Design Review Manager. An appointment with the assigned Land Use Planner must be made at least (3) working days in advance of field inspection. The Land Use Planner will determine whether submission of revised plans is required to ensure that compliance has been achieved.
6. Embed all of these conditions in the cover sheet for the MUP permit and for all subsequent permits including updated MUP plans, and all building permit drawings.
7. Embed the 11 x 17 colored elevation drawings from the DR Recommendation meeting and as updated, into the MUP plans prior to issuance, and also embed these colored elevation drawings into the Building Permit Plan set in order to facilitate subsequent review of compliance with Design Review.

CONDITIONS - SEPA

Prior to Issuance of any Demolition/Construction Permit

8. Submit a copy of the Puget Sound Clean Air Agency (PSCAA) notice of construction.
9. Submit to DPD Land Use Services for approval a Construction/Noise Impact Management Plan.

During Construction

The following condition(s) to be enforced during construction shall be posted at the site in a location on the property line that is visible and accessible to the public and to construction personnel from the street right-of-way. Since more than one street abuts the site, conditions shall be posted on Fifth Avenue and on Marion and Columbia Street. The conditions will be affixed to placards prepared by DPD. The placards will be issued along with the building permit set of plans. The placards shall be laminated with clear plastic or other waterproofing material and shall remain posted on-site for the duration of the construction.

10. The applicant is required to limit periods of all construction to between the hours of 7:00 a.m. and 9:00 p.m. on non-holiday weekdays and to 9:00 a.m. to 6:00 p.m. on non-holiday Saturdays. Activities which will not generate sound audible at the property line such as work within enclosed areas, or which do not generate even moderate levels of sound, such as office or security functions, are not subject to this restriction. Excavation below grade, below grade cement-pouring foundation work and other construction activities employing proper noise and vibration impact reducing technologies and management practices in place may be allowed at other times if set forth in an approved Construction/Noise Impact Management Plan.
11. The sidewalks along the project site shall be kept open and safely passable throughout the construction period. A determination by SDOT that temporary closure of a sidewalk, for structural modification or other purposes, shall over rule this condition.

Prior to Issuance of a Certificate of Occupancy for the Office Component

12. The applicant shall develop a Transportation Management Program (TMP) with the goal of reducing the number of office workers coming to the building by single occupancy vehicles to no more than 20%. The Program shall utilize Director's Rule 14-2002 and be submitted for review and approval to DPD and SDOT.

Signature: _____ (signature on file) Date: February 14, 2008
Michael Dorcy, Senior Land Use Planner
Department of Planning and Development

MD:lc

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