June 29, 2011

Diane Sugimura, Director
City of Seattle Department of Planning and Development
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Seattle, WA 98124-4019

RE: Maximizing Transit Investment in Roosevelt, Capitol Hill, Mt. Baker, Beacon Hill, Othello, South Lake Union, West Seattle Triangle, and other Transit Communities

Dear Ms. Sugimura,

After thorough public participation, planning, review and analysis the City is poised to take significant steps to realize the creation of vibrant, sustainable communities that are served by high capacity transit. We have been actively reviewing the various Neighborhood Plan updates, the Urban Design Frameworks, and in the case of Roosevelt, the proposed rezone. We recognize that rezones and other regulatory tools are forthcoming for Capitol Hill, Beacon Hill, Mt. Baker, Othello, South Lake Union, and West Seattle Triangle.

Land use, zoning, capital investments, and other mechanisms will help implement the vision in these communities. In all of these communities, Seattle has the opportunity to frame how the City leverages the region’s multibillion dollar investments in high-capacity transit.

The recent letters from Mayor McGinn and Councilmember Burgess regarding the Roosevelt rezone are encouraging signs that the City will thoughtfully consider how to align land use and zoning appropriately around investment in transit service. We applaud them for their leadership and concur with Mayor McGinn that the initial zoning proposal at Roosevelt deserves more thought in order to “ensure we make the most of the new light rail and we create new housing and jobs that support the area” and also with Councilmember Burgess that the rezone “allow for development densities necessary to fully capitalize on the community and economic opportunities the planned light rail stations could create”.

The Roosevelt Rezone will establish the benchmark for many forthcoming rezone proposals where a concentration of jobs and housing near high-capacity transit provides great potential. Our early review of soon-to-be-released proposals for zoning and land use changes at three southeast light station areas (Mt. Baker, Beacon Hill, and Othello) indicates that they would benefit from a review with the same lens articulated by the Mayor and Councilmember Burgess. As such we contend that now is the time to outline a clearly defined and transparent citywide Transit Communities policy.
The Commission’s recent Seattle Transit Communities report provides much of what should be included in a citywide transit community policy. It includes a nuanced approach outlined in our four transit community typologies and it recognizes that local and existing conditions for each community need to be considered as individual regulatory changes move forward. Our recommendations ensure new development enriches the unique qualities of a neighborhood and integrates with its surroundings. We hope this report provides on-going guidance to you and your staff. Components and considerations of a citywide Transit Communities policy should include the following:

- **Align zoning to concentrate housing and jobs within a five to ten minute walk or bike ride to frequent, reliable transit service.** It is fundamental to the success of a transit community to concentrate a critical mass of households and jobs within the five and ten minute ‘walkshed’ of a transit station/stop in order to realistically reap the benefits of proximity and to support transit ridership.

- **The ‘walkshed’ is an appropriate and measureable boundary** that can be mapped in a way that considers bike and pedestrian conditions as well as pedestrian abilities and other important factors. We recommend this measurement be used in thinking about the appropriate density and type of land use instead of the quarter or half mile radius, which does not consider topography or other important factors when accessing transit.

- If properly supported by infrastructure and equipped with essential components for livability, such as good access to open space, we recommend **transit communities receive the vast majority of new households and jobs in Seattle.** Jobs and housing goals/targets should recognize the benefits of transit.

- **Prioritize City investments in transit communities.** The concentration of new housing and jobs in transit communities demands that these areas are rich in services, infrastructure, and necessary components of livability, such as open space, parks, plaza, street lights, libraries, and community centers. With these essential components of urban life, neighborhoods become complete communities that are attractive and hospitable for a whole range of Seattleites. A citywide TOD policy should model the federal approach that aligns HUD, DOT, and EPA, which will help us simultaneously meet transportation, housing, and environmental goals and ensure Seattle is competitive for essential federal sustainable communities funding.

- **Transit level of service should be more strongly factored into rezone criteria.** Develop specific metrics or criteria to guide land use and density choices within transit community walksheds. Such metrics or criteria should be integrated into the Comprehensive Plan and/or rezone criteria, and should take precedence over general or citywide rezone criteria in designated transit community locations.

- **In places like Roosevelt, six and seven story (65 to 85 feet) buildings throughout the core will most likely result in the density needed** to create market conditions and feasibility for a vibrant neighborhood retail and commercial district. It will also create greater efficiencies for public service delivery. Using light rail, a resident of the Roosevelt community could be at the University of Washington in five minutes and in the downtown job core in eleven minutes. As the reservoir is decommissioned, additional opportunities exist that could provide family friendly housing near both open space and high-capacity transit. Family housing near light rail, RapidRide, and other high-capacity modes is a rarity and the opportunity must not be squandered.
• **In transit communities**, reevaluate single family zoned land within the five to ten minute walkshed. It is critical that we look at all lands close to transit, not just those already zoned multifamily or commercial, if we aim to take full advantage of our investments in high-capacity transit. This can be implemented as the city considers proposed zoning changes that identify opportunities for higher density or intensity as appropriate in each situation. This goal is inhibited by the Comprehensive Plan policy LU-59 (rezone criteria) which has long needed revision.

• **Rethink single family zoning designation for schools.** In order for families with children to live in vibrant transit rich neighborhoods we must recalibrate our 1960’s suburban context when thinking about the relationship of schools and neighborhoods and investigate modern examples of schools within mixed-use, higher density developments. Our zoning approach should strongly consider how we can create family-focused, multifamily transit communities that ring our schools and parks.

• **Taller buildings** can play a positive role in defining a core with enough households and jobs to support transit and street life. For instance, many of the transit communities designated Mixed Use Center such as Capitol Hill and South Lake Union could accommodate mixed-use buildings that are significantly taller than nearby buildings at/or directly adjacent to the transit node or station. Policies that encourage thoughtful building massing and design and allow the private provision of public benefits in return for significantly increased height could help Seattle “design the skyline” of its neighborhoods. The Commission is intrigued by the concept of an iconic tower being explored in the Capitol Hill Urban Design Framework.

• **Create strong policies, tools and funding mechanisms for joint development with other public agencies.** Public agency land acquisition is a game changer because it creates a catalytic development opportunity. Joint development at light rail stations should take advantage of the unique proximity to transit. For instance, the single use station proposed at Roosevelt will significantly reduce opportunities for activation, vibrancy, and ridership to support Sound Transit. On the other hand, the vision being explored at the Capitol Hill station - community plazas, mixed-use development, interconnected multimodal transit integration, intentional and elegant connections to the neighborhood business district and Cal Anderson Park - is inspiring. There are numerous examples where joint development acts as a catalyst for development for instance:
  
  o In Atlanta, MARTA’s joint development projects have been shown to add up to three dollars per gross square foot to annual office rents, demonstrating the desirability of transit proximity.¹
  
  o In Portland, Metro’s joint development policies have enabled the construction of over 2,100 new housing units at transit stations since 2000, more than one quarter of which are designated affordable.²
  
  o In Washington DC, WMATA generates $6 to $9 million annually in lease revenue³ from 26 joint development projects, many of which allow direct retail connections to Metrorail stations.⁴

Additionally, rail transit facilities present unique opportunities to forge capital partnerships around the joint development of sustainable urban infrastructure. WMATA receives $14 million annually for leasing fiber optic capacity in its existing rail tunnels and surface alignments.⁵ Vancouver BC is exploring how to couple a low temperature hot water district energy system with new cut-and-cover tunneling for the Canada Line along the Cambie Street corridor.⁶ Here in Seattle, our deep bore LINK tunnels could provide the opportunity to integrate geothermal loops into the tunnel shells, transforming our transit lines into clean energy generators and our station...
portals into district energy hubs for green development. It’s within the public interest to ensure public agency partners such as Sound Transit and King County Metro work collaboratively with the private sector and others to make the most of these opportunities in our city as well as better leverage their own investments in regional transit.

- **Better tools are needed to ensure that station entrances treat land capacity as a vital urban resource and to ensure co-development becomes the norm.** In several Seattle neighborhoods, the elevation and alignment of the tracks (Mount Baker) or the footprint, height, and/or roof system of the station buildings (Capitol Hill, Roosevelt, Northgate) may inhibit the ability to create vibrant transit communities. Minimum densities in station areas and other tools should be considered as a way to ensure our partner agencies have clear direction about future development over and adjacent to transit station. Cities such as Bilbao, London, Los Angeles, and Pasadena seek to minimize the footprint of station entrances and place them at-grade so that vital civic open space can be provided, or so that future development over the entrance can maximize the amount of active sidewalk frontage and housing and jobs capacity. The City should use all of its tools to ensure appropriate building over the station enhances the vibrancy of the community.

- **There are no minimum residential parking requirements in Urban Centers, Urban Villages, and Station Overlay areas; minimums should also be eliminated** in areas with frequent transit service (defined by areas with a certain threshold of transit service – headways, number of lines, number of routes, span of service). The Planning Commission recommends establishing parking maximums and shared parking programs in transit communities.

Thank you for the opportunity to provide you with our recommendations for realizing the vision of vibrant, complete transit communities. We look forward to assisting you as the process advances. Please contact me or our Director, Barbara Wilson at (206) 684-0431 if you have further questions.

Sincerely,

Josh Brower, Chair
Seattle Planning Commission

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**SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURE & RECUSAL**

- Commissioner Colie Hough Beck disclosed that the consulting firm she works for, Hough Beck & Baird Inc., has contracts with public agencies for infrastructure and recreation projects and with private housing developers in Seattle.
- Commissioner David Cutler’s employer, GGLO, advises clients and designs projects that are in close proximity to transit and that may be impacted by policies for Transit Communities. Currently, GGLO has projects in South Lake Union, at Yesler Terrace, and within the walk sheds of the Roosevelt, Brooklyn, Capitol Hill, and Columbia City Link light rail stations.

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3 http://www.wmata.com/about_metro/riders_advisory_council/minutes/docs/Metro%20Budget%20Overview_RAC%202011.pdf
6 http://vancouver.ca/engsvcs/transport/rtto/canadaline/cambie/streetscape.htm