

Seattle Planning Commission Response to Council President Steinbrueck's Letter of March 25, 2003

Question #1

Are the current zoning regulations in the Northgate Overlay, or the Mayor's proposed regulatory changes, sufficient to support and encourage the development desired by City policy both in the broader Northgate sub-area and at the Northgate Mall site?

Commission Response:

The Commission believes that zoning regulations, on their own, are not sufficient to support and encourage the development desired by City policy, both in the broader Northgate sub-area and at the Northgate Mall site. Realization of the urban center vision for Northgate will require significant additional action by the City in the form of investment in urban infrastructure, plan synchronization with other governmental entities, and ongoing coordination of numerous private development actions.

The Commission does feel, however, that the existing regulatory framework codified in the General Development Plan is a significant barrier to achieving the city's objectives for the Northgate Mall site and the Northgate neighborhood. The Commission supports the notion that the owners and developers of large parcels of property need to provide predictability about their conceptual development plans and address significant impacts resulting from their developments. However, this can and should be done within a cooperative environment that clearly recognizes and supports the important role that private development plays in accomplishing Northgate Area Comprehensive Plan goals. The Commission has been concerned about this process for some time, and co-sponsored two focus groups to foster dialogue from a variety of stakeholders in 2001. The conclusion from these focus groups was that the General Development Plan should either be replaced by a much simpler and clearer process, or be streamlined to accomplish those goals.

After reviewing the Mayor's proposal relating to Northgate, including a review of the proposed Development Agreement between the City and Simon Property Group, the Commission believes that the proposal outlines a regulatory framework that will technically accommodate development goals, while also including near-term commitments to begin implementation of those goals. We recognize that the proposal itself is not likely to be sufficient to meet Town Center vision on its own—nor should it be expected to. It is, however, a reasonable first step toward achieving the Town Center vision that the Commission can generally support. The proposal is welcome in its effort to push past the Northgate development impasse, even if somewhat conservative and vague with respect to certain development aspects such as housing and coordination of future development and open space at the mall.

Questions #2 and #3

If not, what specific changes might be advisable? (Re: question #1 above) Is the proposed development of the Mall site consistent with the goals and policies mentioned above?

Commission Response:

The answer to the second questions is a qualified "yes" based on recognition that the development proposed by Simon Property Group—and enabled by the proposed Development Agreement—does not resemble in any way the transformation of the mall that community members had hoped for when developing the Town Center vision. At the same time, we also recognize the challenges faced by Simon

in staying competitive, and have come to the conclusion that some near-term redevelopment is better than none. In fact, the proposed development—although limited in scope—may be necessary precondition to ultimately paving the way for future redevelopment that is closer to the original vision. Having said that, we believe the Mayor’s proposed regulatory changes will be sufficient to support and encourage the development desired by City policy only as long as certain conditions are ensured in the Development Agreement and/or related City actions, including:

- Requirement for new development to front on 5th Avenue.
- Excellent pedestrian connections, both within the mall and to surrounding land uses (which is why the Northgate Way crossing is so critical).
- More coordination with Metro and City plans, with specific performance measures or actions identified. This coordination is critical for the long-term development of the Northgate area.

If implemented, the actions above would make the mall a stronger player in creating the vibrant, urban town center the community desires. Taking a first step is important, but we must continue to acknowledge the larger context and indicate how this first step fits within that context.

Question #4

Is the amount of open space required under the Mayor’s proposal for the Mall and for other properties in the Northgate Overlay consistent with the goals and policies mentioned above?

Commission Response:

The amount of open space required under the proposed Development Agreement is logical and reasonable and a welcome change of direction from existing requirements. In addition, the opportunity to create a stormwater detention facility that provides significant water quality benefits and also functions as open space—potentially developed in concert with the eventual/ultimate owners and developers of housing on the south lot—is a significant and meaningful contribution to area open space. The City’s decision to acquire land for this purpose was strategic and correct for a variety of reasons.

The only caution we have is that open space that is developed incrementally on the mall site should still be done within the context of a broader vision if it is to result in more than a series of disparate and disconnected spaces. We need to hold to a shared vision, and to constantly reference that vision with each step along the way. Toward that end, we encourage the City to assist the mall in developing a larger vision for open space into which these incremental additions can fit.

Questions #5 and #6

Are the 150 units of housing on the South Lot middle parcel a sufficient contribution to the mixed-use development envisioned? What alternatives, if any, would you recommend?

Commission Response:

Based on a very preliminary assessment of approximately 23 units per acre as compared with earlier goals suggested in the City’s Comprehensive Plan, the Town Center work, Metro’s initial proposals for housing, and our belief that the site can easily support development closer to 60-80 units per acre, the Mayor’s proposal is insufficient to create a viable residential presence—even acknowledging that this is just the “first step.” In fact, because this first development needs to be a catalyst and a standard for others to follow, the City needs to be a stronger partner and work with Simon Property Group to realize a greater number of housing units on the South Lot parcel B—offering incentives and code departures if necessary.

Question #7

Are there aspects of the NACP that are no longer viable and warrant change?

Commission Response:

The question of when to revisit provisions of adopted plans is a broad city-wide issue and will require further discussion to explore appropriate criteria, critical issues and triggers, as well as options for the process of reviewing and revising plans. We believe that this important question should be addressed independent from deliberations relating to the proposed Development Agreement.

Question #8

What are the implications of the Mayor's proposed code changes for future development of the Mall site beyond the initial development covered by the development agreement?

Commission Response:

As stated in our responses to some of the other questions, the Commission is concerned about the potential for piecemeal actions at Northgate—whether open space, mall development, or transportation planning—and continues to urge a holistic approach to all Northgate work. In a broader sense, it is clear the GDP has not been an effective tool; the City needs to look more creatively at how it addresses large parcel redevelopment of the kind that occurs on the mall site or the sites of major institutions. We believe that a Development Agreement is an appropriate instrument through which near-term actions can be coordinated, although the achievement of longer-term objectives may require a series of alternative strategies. In short, the concern that Northgate will redevelop in ways that are not as cohesive, pedestrian friendly and functional as envisioned in the neighborhood plans without the framework of a guiding “master plan” is outweighed by concern over a stagnant mall.

Questions #9 and #10

I have heard of conversions of shopping malls to new urban environments around the country. How have these been accomplished? Do they have any relevance to Northgate?

Commission Response:

It is always useful to look around to other cities and sources as models for what might work here. Local examples include Bellevue Square, whereby a suburban mall surrounded by parking has transformed into a thriving urban place with development to the streetfront and pedestrian connections to a public park and other development. Metrotown in Vancouver B.C. and the University Village are other examples, although less applicable. The Commission researched this topic in 2000 and compiled nationwide information on redeveloping/retrofitting malls to create town centers and more pedestrian-oriented places. That report is attached for your use.

Question #11

Is the proposed storm water treatment and detention facility consistent with City storm water facility planning, and policies and priorities concerning Thornton Creek?

Commission Response:

Based on a brief presentation, it appears the proposed facility is consistent with City policies. We are supportive of the Mayor's proposal and its ability to balance several issues at once—stormwater drainage and detention, natural feature stormwater treatment, and creation of needed open space. It will be important that the facility is designed attractively and in concert with south lot development.

Question #12

Should those who plan to develop commercial property contribute to the cost of the Coordinated Transportation Investment Plan?

Commission Response:

Private development clearly should be required to minimize, and, where unavoidable, to mitigate adverse impacts of their development. Where mitigation of development impacts involves investments in parts of the area's transportation systems, these mitigation measures would best serve public benefit if identified through an area-wide, comprehensive, *Coordinated Transportation Investment Plan*. Based on briefings from Executive staff, the Commission understands that staff intention is to develop a *Coordinated Transportation Investment Plan* that would undergo SEPA analysis, which would then be made available to proponents of specific development proposals. This effort could in many ways replicate the efficiency and coordination associated with a planned action Environmental Impact Statement, allowing greater coordination of mitigation efforts.

When dealing with transportation, the City needs to take the same approach in Northgate as they are in South Lake Union. Any transportation analysis needs to be area-wide and not simply focused on the mall (which appears to be the direction so far). The City must look beyond the mall parking lot when dealing with transportation issues and take into account the major institutions in the area (hospital and community college) and their long-term expansion plans.

To some degree, the question before us is whether development should pay for transportation improvements beyond mitigation, since mitigation would be paid for by development under any existing City practice. In principle, the Commission supports the City in its investigation of methods to determine the appropriate share of infrastructure and service improvement costs that should be borne by new development. In practice, the instrument through which impact fees (for example) are collected and administered must be fair, consistent, and easily understood. The Commission believes that such a framework can be developed, and that the broader City policy issues that will arise during this investigation can be adequately addressed, but we do not believe that this specific Development Agreement should be delayed until these policy and administrative complexities are resolved.

Question #13

Do you have recommendations that the City should convey to Metro/King County for development of the transit center site?

Commission Response:

As a developer, Metro/King County should be held to the same objectives we are holding Northgate to, notably those mentioned in responses to previous questions. Any development related recommendations we have for Simon Property Group as part of the development agreement should reasonably apply to Metro and their plans for TOD.