



# City of Seattle

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January 30, 2008

Diane Sugimura, Director  
Department of Planning and Development  
PO Box 34019  
Seattle WA 98124-4019

### Re: Recommendations on South Downtown Preferred Alternative

Dear Ms. Sugimura,

The Planning Commission would like to thank you for the opportunity to provide our advice as you select a preferred alternative for the Livable South Downtown study area.

We recommend that the preferred alternative and area plan include a stronger and better defined explanation of the City's vision for the area, with a clearly defined purpose and need for the proposed changes there. Without a stronger framework and clearly defined guiding principles we found it difficult to judge the performance of each alternative outlined in the Draft Environmental Impact Statement.

We have focused our review on five major policy areas: industrial lands, transportation, housing, open space/public amenities and physical environment.

#### **Industrial Lands:**

We strongly recommend that the City develop another alternative that would maintain all IG2 zoning in the study area. We are concerned about the potential rezoning of significant amounts of industrial land as presented in all DEIS alternatives. Impacts of such a rezone on the city's industrial sector, including impacts to the economy, diversity of Seattle's residents, and the City's character has not been adequately explored, and a more detailed analysis of this subject needs to be developed.

A clearly stated public policy rationale for changing IG zoning to another zoning designation is needed. The Planning Commission's recently released report *The Future of Seattle's Industrial Lands* found that industry in Seattle is thriving, and that there is a strong public interest in maintaining, and even growing industrial sector jobs, and that industrial land is a limited resource and commodity. All of the proposed alternatives outlined in the DEIS are inconsistent with these findings. In addition, some of the alternatives also create the potential for housing development in former industrial zones that could provoke conflicts between different uses.

*Specific Comments:*

- Our report states that “...rezones (to zones designated Industrial) should be severely limited and only allowed in special circumstances when there is a well-documented public policy rationale for doing so.” In the case of the proposed rezones of industrial land in South Downtown, this public policy rationale has yet to be provided.
- In our report we state that “...in order to preserve and foster Seattle’s industrial businesses, the City should not reduce the geographic area of its General Industrial (IG1) and General Industrial 2 (IG2) zones.” Under all the proposed alternatives, the IG2 land South of Dearborn would be rezoned to another designation. An alternative that does not rezone this land must be thoroughly explored by the City.
- Our report states that “The City should treat land in Seattle’s MIC as an area that requires additional sanctuary from uses that degrade and compromise industrial uses.” The WOSCA site and South of Dearborn area are both currently in the Manufacturing Industrial Center (MIC), and a clear public policy rationale needs to be developed for why these sites are being proposed to be removed from the MIC.
- Our report states “residential uses should continue to be expressly prohibited in industrial zones.” Allowing housing in close proximity to existing industrial businesses creates the potential for significant conflict between uses. In addition, housing in such close proximity to I-5 in the South of Dearborn area and SR-99 on the WOSCA site is inadvisable and would not be compatible with surrounding uses.

**Transportation**

Mitigation strategies should focus on two main areas – freight and transit mobility. Additional infrastructure for bicyclists and pedestrians should be provided in the study area. Slower movement of single occupancy vehicles should not be a primary concern of the mitigation strategies for the study area.

It is important to recognize that the existing conditions in the study area related to vehicle and transit transportation are approaching or exceeding adopted standards, and will likely degrade further even without any zoning changes. While the zoning changes will have adverse impacts, they will likely marginally degrade existing conditions rather than radically alter the situation. The impact to the transportation system is significant under all alternatives as they exist today, but based on the DEIS analysis, transportation impacts do not seem to be a large differentiator among the alternatives. Regardless, there are existing transportation infrastructure deficiencies in the study area that merit immediate attention before changes to the area should be considered.

Because of the non-localized nature of the trips that occur in the study area, the city should be more focused on regional approaches to mitigate future transportation impacts in the area.

*Specific Comments:*

- Many of the proposed mitigation strategies for vehicle traffic are not specific enough, and some will need to be applied to a city-wide or region-wide scale to be effective. In particular, Transportation Demand Management (TDM) or other demand-side strategies must be pursued citywide and regionally to make any difference on vehicle traffic in the study area.

- Ninety percent of the vehicle traffic moving through the study area is pass-through traffic. Mitigation applied only in the study area may be an insufficient strategy for addressing the congestion future development will bring to the area.
- Freight mobility is a major concern for this area, and impacts to freight mobility due to zoning changes should be mitigated. However, compromises will have to be made occasionally to ensure freight mobility and livability are both valued. On certain routes, freight is the highest and best use for the transportation system, but on other routes it may not be.
- Transit mobility is also a major concern for the study area, and impacts to transit mobility due to zoning changes should be mitigated.
- Pedestrians and bicyclists should be considered in addition to freight and transit mobility, and infrastructure investment to enhance and make these modes attractive should be made while not compromising efficient flow of freight and transit.
- Implementation of maximum parking ratios similar to those existing downtown would help mitigate the impact of new office development in the study area.
- Existing transportation deficiencies regarding freight and transit mobility should be addressed before adding new users to the area. One example is bus performance in the study area, which currently does not reach a passing threshold on multiple streets in terms of passenger load, speed and frequency.
- It remains unclear how changes to the viaduct or regional north-south travel could impact transportation in the study area. A complete explanation of what level of traffic was assumed for the viaduct and how different outcomes for the viaduct's future could impact the study area should be provided. In addition, information about how the proposals relate to and are affected by the Urban Mobility Plan should be provided as soon as it becomes available.
- Potential conflict exists on Fourth Avenue South, as it is designated both as Major Truck Street and as a bicycle route in the city's recent bicycle plan. Strategies for mitigating this conflict should be developed. This situation may be relevant on other routes in the study area as well.

### **Open Space/Public Amenities**

More work is needed to find the right balance of development opportunity and public investment to ensure a truly livable part of the city for the future. Issues needing a better outlined plan for moving forward include public safety, public open space, sustainable design values and a walkable and transit-based city design. To proceed without such plans would be to repeat past development errors without sufficient investment in public infrastructure that plague such areas as Belltown. We are particularly concerned that there is a lack of a detailed plan for providing sufficient open space and public amenities in the study area that would adequately serve the influx of new residents and employees arriving as a result of proposed zoning changes. The zoning changes should not move forward until this concern is addressed. These changes should not be viewed simply as a means to accommodate certain property owners in the area to increase market rate housing in South Downtown, but instead to create a truly livable neighborhood there.

We recognize the diverse neighborhoods within the study area. These neighborhoods have significant differences. The plan and strategy for housing, public amenities, and other issues should reflect those differences.

*Specific Comments:*

- We recommend the development of an urban design strategy concept plan for an integrated, sustainable and rich urban district.
- We recommend that a separate study of open space be engaged before adopting any of the zoning recommendations in the study area to identify open space needs, including the following: parks and recreational areas as identified by the DEIS; public plazas, squares and fountains; green streets and pedestrian promenades; urban boulevards with significant public amenities including trees, street furniture, public rest rooms, and supporting commercial uses; and P-patch gardens.
- Impacts on local services as a result of increasing population and jobs in the study area should be better documented. A deeper analysis of demand for libraries, community centers, police and fire service facilities, schools, and commercial support facilities could reveal greater need than is detailed in the DEIS.
- The ‘over-the-tracks’ area could be explored for an open space component as part of any development.

**Housing**

Strategies must be developed to ensure adequate affordable housing is supplied to those areas that desire it, while also determining how certain areas could be enhanced to attract market rate housing and homeowners. Care must be taken to develop strategies that fit each neighborhood. Some areas strongly desire more affordable housing, while others want more market rate housing. More detailed and significant mitigation strategies need to be developed for the “at risk” affordable housing units mentioned in the report, as they represent a potentially very large loss of affordable housing stock.

*Specific Comments:*

- We are concerned about significant increases in housing targets for this area without a detailed funding plan that will outline the minimal amenities to make this area livable.
- We do not believe that residential development is appropriate in the area South of Dearborn where noise and pollution levels are inconsistent with this type of development.
- The estimates provided in the DEIS regarding the demand for affordable housing in the area are not accurate as they rely on a 1983 survey of Downtown employees. This study is dated and too limited to accurately reflect the increasing level of demand for housing downtown. Furthermore, even with the current estimates, total demand for affordable housing will far outpace the amount of units provided through the tools outlined in the DEIS. When at-risk units are factored in, the affordable housing tools in the DEIS appear even more inadequate.

- The City's incentive zoning strategies need to be closely examined when considering their implementation in South Downtown. The proposed requirement of 11 percent of the bonus floor area toward public benefits is low, and is significantly lower than other major cities that have adopted such programs. It is also important that incentive zoning programs not be considered a panacea for the affordable housing and public amenities needs in the study area.
- Mitigating or preventing the potential loss of currently affordable, 'at-risk' housing in the study area should be a top priority. Protecting this housing stock potentially represents the most affordable and achievable way to ensure a diversity of housing choices exists in the study area after proposed zoning changes occur.
- The potential negative effects to industrial businesses caused by placing housing adjacent to industrial zones needs to be thoroughly explored and addressed.
- The Office of Housing should clarify the method used to calculate how many new affordable units will be created by the proposed incentive zoning program. It is possible these calculations incorporate leveraging of funds that have dried up in recent years.

### **Physical Environment**

Generally we support many of the suggestions made regarding water, energy, stormwater and sewer utilities, as all work towards achieving important sustainability goals.

We are concerned about seismic hazards and believe that liquefaction hazards may be greater than is suggested by the DEIS. The City should plan now to ensure that no one is put at undue risk for future seismic disaster. Mapping of the liquefaction zones should be provided for the study area. New housing construction is of particular concern in the liquefaction areas. At the very least, a detailed analysis of how the City would address a situation in which housing in liquefaction zones is rendered unusable following an earthquake should be provided. In addition, extensive geotechnical analysis should be performed before building housing on liquefaction areas.

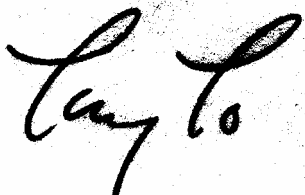
In addition we believe that the economic impact of building failures due to a seismic event above the "over the tracks" area would be so catastrophic that building occupied space over these tracks in any area where potential liquefaction has been identified should be prohibited. We recommend down zoning all liquefaction areas if they are within a critical area. At the same time we believe that some liquefaction areas would be appropriate for uses such as public open space and acting to create better connection to all neighborhoods in the South Downtown study area.

#### *Specific Comments:*

- We recommend that more detailed review of the literature concerning zoning requirements for building in areas of liquefaction be conducted. This study should include data from recent earthquake experiences in Oregon and California (Loma Prieta and Northridge earthquakes). Liquefaction areas must be mapped so that it is possible to see what areas fall within and without this zone of highest risk.
- Encouraging sustainable strategies for utilities in the area, including district-based heating and cooling and stormwater harvesting, are important and laudable elements of the plan for South Downtown.

We look forward to working with you and your staff in developing the preferred alternative and in helping to assess specific elements of the proposed changes as this project moves forward. Please do not hesitate to contact us if you need additional clarification by contacting our Director, Barbara Wilson, at (206) 684-0431. We are committed to providing you with our assistance and advise as you move forward in the development of a preferred alternative.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony To". The signature is written in a cursive, flowing style with some ink bleed-through or texture visible.

Tony To, Chair  
Seattle Planning Commission

cc: Mayor Greg Nickels  
Seattle City Councilmembers  
Tim Ceis, Nathan Torgelson, Mayor's office  
John Skelton, Tom Hauger, Susan McLain, Gordon Clowers, Gary Johnson, DPD  
Adrienne Quinn, Rick Hooper, Office of Housing  
Grace Crunican, Susan Sanchez, Tracy Krawczyk, Ron Borowski, SDO  
Rebecca Herzfeld, Norm Schwab, Michael Jenkins, Ketil Freeman, Council Central Staff