



City of Seattle

Seattle Planning Commission

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July 30, 2008

Honorable Councilmember Sally J. Clark
Chair, Planning, Land Use and Neighborhoods Committee
Seattle City Council
PO Box 34025
Seattle, WA 98124-4025

Re: Seattle Planning Commission Comments on the Proposed Rezone to Dravus Area

Dear Councilmember Clark,

Per your request please find the Commission comments and recommendations regarding the proposed rezone of the Dravus Area.

General Comments on Proposed Rezone

As stewards of Seattle's Comprehensive Plan we support consistency with the City's growth management strategy and the Comprehensive Plan's Urban Village strategy. We recognize this proposal represents a diversion from those City policies.

Overall Seattle Planning Commission (SPC) Recommendation: We support considering greater heights and densities in some cases where specific conditions are present which warrant such action. As such, we generally support the decision to rezone the area as Seattle Mixed to allow for a variety of uses, increased residential densities, and increased height to encourage a variety in building scale, pedestrian experience, and opportunities for open space, light and air.

Increased Density and Consistency with Urban Village Strategy

The Comprehensive Plan's Urban Village strategy is the blueprint for managing Seattle jobs and housing growth and ensures that limited City resources are used in an efficient and thoughtful way to serve high-growth areas with the needed infrastructure and amenities.

We acknowledge that the intensity of development proposed for the Dravus site is far greater than what would normally be allowed in an area not designated as a high-growth area by the Comprehensive Plan such as Urban Centers, Urban Villages, Hub Urban Villages or Residential Urban Villages.

Allowing for greater heights and greater densities in areas not identified in Seattle's Urban Village Strategy may cause some concern, particularly about the precedent it could set and its potential to undermine the City's strategy of encouraging growth in specific areas.

However, the Planning Commission is also concerned about accommodating the predicted jobs and housing growth likely to come to Seattle by 2040. With an already built environment and limited amount of land supply Seattle faces hard choices and trade offs. For instance, there is currently great pressure to further erode Seattle's industrial land base; there are mounting challenges to provide housing affordable to Seattle's workforce; and pressure is beginning to build to rezone the city's single family zoned land which comprises over 65 percent of Seattle's total land area.

SPC Recommendation: Taken in the above context, the Planning Commission is generally supportive of allowing increased heights and densities in areas of the city where it makes sense. First and foremost the City should examine ways to allow for more high-density development inside of Urban Centers, Urban Villages, Hub Urban Villages or Residential Urban Villages.

Standards for Higher Density Development Outside Urban Centers and Villages

We do believe that there may be areas outside of Urban Centers and Villages - such as Dravus - where we could allow higher density development if the area meets a set of standards. At a minimum, the following standards should be considered:

- The area is in close proximity to a transit hub or transit priority corridor;
- There is sufficient neighborhood support for the project;
- Important public amenities, such as a sufficient supply of open space, already exist, are adjacent to, or are planned and funded for the area;
- There is an agreement by the developer to make infrastructure improvements necessary to handle higher density through a Local Improvement District (LID) or other arrangement that is agreeable to the City, and;
- The development achieves a higher public purpose such as creating and emphasizing residential development that is affordable to a mix of income levels.

SPC Assessment of Dravus Rezone with Regard to Standards:

Based on the above standards, the SPC believes:

1. The area is in close proximity to both current transit corridors and a proposed Rapid Ride station meaning that new residents would be well-served by public transit.
2. The surrounding neighborhood groups and residents appear to generally support the Dravus proposal.
3. The adjacent open space provides a significant amenity for future residents. Public realm improvements will be needed as will other important amenities that add to making a development into a 'neighborhood.'
4. The proposal includes a LID that will require property owners to assist in financing critical infrastructure necessary to accommodate this growth.

We feel that the LID and incentive zoning package are key components necessary for making this proposal acceptable. Part of the reasoning behind the Comprehensive Plan is to encourage growth where the City has already developed infrastructure, thereby lowering the public cost of new development. The Dravus area does not currently possess some of the infrastructure needed

to accommodate a large number of new residents. However, the proposal to implement a LID to pay for the area's necessary infrastructure improvements means they will be made at minimal cost to the City. We believe this is a reasonable compromise for allowing the Dravus development team (Interbay Neighborhood Association) to build a higher density mixed-use development in the proposed location. The Commission agrees with the City's stipulation that no new development under the new zoning should begin until the necessary infrastructure improvements have been made.

5. The proposal includes an incentive zoning program that focuses on housing affordable to a mix of incomes.

Potential new growth should emphasize a residential component in order to maintain a jobs/housing balance in the city. This balance is an essential component of smart growth. The City's proposal to require that any development above 40 feet be residential takes an important step towards ensuring that the project will in fact provide a substantial addition to Seattle's housing stock.

While much of the discussion about Dravus has centered on building height, when considering height limits the major considerations should be architectural form and what height limits provide for the best Incentive Zoning package, both for the developer and the community.

In terms of architectural form the City should consider height increases and articulation that provides an alternative to the symmetrical canyon effect that has developed in some areas of the city. Such variations should result in a community that has access to open space, light and air.

In terms of the public benefits package for Dravus, it remains to be seen which height limit would provide the most public benefits. Construction technology represents an important component of this analysis, and the pro formas used to develop the incentive zoning package should make every effort to use accurate current construction technologies and cost estimates. It is important to note that the development team will receive an enormous financial benefit if their land is rezoned to allow for their proposed development. The community should receive some benefit for this increased value to the land in addition to the necessary infrastructure improvements, making an Incentive Zoning program an important component of the Dravus development. However, the City should also work to ensure that the development team receives a real incentive for increasing the density of the development, not a disincentive.

Protecting Adjacent Industrial Uses and Jobs

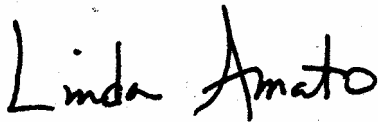
While the proposed development will not rezone any land currently zoned Industrial, the project would introduce residential units to parcels abutting industrial businesses. This causes us great concern, as the noise, light and pollution of industrial businesses often conflicts with residential uses. These conflicts can threaten operations of industrial businesses, which in turn can lead to the elimination of industrial jobs. In the Planning Commission's recently released *Future of Seattle's Industrial Lands* report we state "The City should align its zoning and land use policy to ensure that integrity of Seattle's vibrant industrial businesses."

SPC Recommendation: We strongly recommend a high degree of consideration be paid to industrial land adjacent to the area being considered in the Dravus proposal. We recommend that the City implement the building code standards applicable to residential buildings adjacent to industrial uses and adequately address the noise and light issues associated with allowing residential development next to industrial uses. We also suggest that each project evaluate, through SEPA, potential adverse effects of noise on residents. The City should also consider specifying a performance standard for all interior sound levels in residential uses, especially those adjacent to industrial uses.

In addition, the City should make it clear that rezoning the land in the study area is not meant to set a precedent for rezoning the industrial land adjacent to it. Finally, it should be determined if the transportation infrastructure improvements proposed in the Local Improvement District (LID) are sufficient to mitigate any impacts on freight mobility.

We thank you for this opportunity to assist you in your work and look forward to continuing to provide Council with our independent expert review as the proposal moves forward. Please contact me or our Director, Barbara Wilson at (206) 684-0431, if you have further questions.

Sincerely,



Linda Amato, Chair
Seattle Planning Commission

cc: Mayor Greg Nickels
Seattle City Councilmembers
Tim Ceis, Nathan Torgelson, Mayor's office
Diane Sugimura, John Skelton, Tom Hauger, Jim Holmes, DPD
Grace Crunican, Tracy Krawczyk, SDOT
Rebecca Herzfeld, Ketil Freeman, Council Central Staff

RECORD OF DISCLOSURE/ RECUSAL

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| <ul style="list-style-type: none">- Commissioner Tom Eanes recused himself from all Commission discussion and action in this matter.- Commissioner Martin H. Kaplan disclosed that he is a member of the Queen Anne Community Council and Land Use Review Committee and has reviewed the project as a Queen Anne resident many times.- Commissioner Amalia Leighton disclosed that her firm, SvR Design Company, has a contract with Seattle Public Utilities (SPU). In March 2008, SPU hired SvR to review the Department of Planning and Developments SEPA Checklist and identify information needed to estimate the stormwater and wastewater capacity requirements of the proposed rezone. |
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