

FINAL
ENVIRONMENTAL IMPACT STATEMENT
FOR
DOWNTOWN HEIGHT AND DENSITY CHANGES

January 2005

City of Seattle

Department of Planning and Development

Prepared in compliance with:
State Environmental Policy Act
Chapter 43.21, Revised Code of Washington
Chapter 197-11, Washington Administrative Code

PREFACE

Introduction

On May 3rd, 2001, the City of Seattle Strategic Planning Office issued a SEPA Determination of Significance (DS) for a proposal to change several existing zoning provisions for a portion of Downtown Seattle. This proposal originates from concepts expressed in the neighborhood plans for the Denny Triangle neighborhood and the Commercial Core, as well as the plan prepared by the Downtown Urban Center Planning Group (DUCPG). Numerous discussions between neighborhood stakeholders and City staff since 1999 have helped define a proposal that is being advanced for further discussion and decisionmaking.

FINAL EIS ORGANIZATION

This Final EIS is organized as follows: Chapter 1 describes the newly defined Preferred Alternative that was developed since publication of the Draft EIS; Chapter 2 provides a description of the four alternatives evaluated in the Draft EIS; Chapter 3 provides discussion of several "key issues and findings" identified as a result of the Draft EIS analysis and commentary on it; Chapter 4 contains a summary of impacts and mitigation measures (reproducing and expanding upon Chapter 1 of the Draft EIS) that includes new analysis of impacts for the Preferred Alternative; and Chapter 5 which contains responses to public comments received on the Draft EIS. A transcript of public spoken comments from two meetings and responses to those comments is included in Appendix A.

SEPA NON-PROJECT REVIEW

Pursuant to the State's SEPA requirements, this environmental impact statement has been prepared to examine the potential for environmental impacts from this proposal. This is a "non-project" proposal in that it involves decisions on policies, plans or regulations rather than a single site-specific project. In this case, the proposal is for changes to regulations in the Land Use Code. The analysis is intended to describe how the proposed regulatory changes would affect future long-term development patterns, and whether those changes would result in significant adverse impacts. The intent of this EIS is to provide substantive analysis of impact implications (at a programmatic level of detail), to aid in making final decisions on the proposal.

The State's SEPA rules and handbook provide for flexibility in the content and formatting of environmental review for non-project proposals, because details about the proposal are typically limited. Topics that should be addressed include: background, objectives, existing conditions, description of the proposal and alternatives, and environmental impact analysis. The level of analysis should be consistent with the specificity of the proposal and available information.

Broad analyses of non-project proposals can facilitate "phased review" by addressing bigger-picture concerns and allowing review of future proposals to focus on a smaller range of more specific concerns. This means that future proposals in the study area could incorporate or refer to portions of this EIS to fulfill their SEPA requirements. This could increase the efficiency of environmental review and expedite permitting processes.

FACT SHEET

Project Title

Downtown Seattle Height and Density Changes

Nature and Location of Proposal

This Final EIS examines five alternatives that cover a range of possible actions for the City Council's consideration. Three of the alternatives (**Alternatives 1, 2 and 3**) consist of different combinations of increases in allowable maximum heights and densities (volumes) of buildings in several Downtown zones. A "**No Action**" Alternative (**Alternative 4**) is included to assess what is likely to occur over time under the current Land Use Code. The Preferred Alternative is a new alternative included in this Final EIS, to represent the Mayor's recommendation for changes to the Downtown zoning.

The area affected by the proposal includes portions of the Denny Triangle, Commercial Core and Belltown neighborhoods within Downtown, but does not include the retail core (zoned DRC), the International District, or Pioneer Square neighborhoods.

Alternative 1 (High End Height and Density Increase) would increase height and density provisions in portions of Downtown zoned Downtown Office Core 1 and 2 (DOC 1, DOC 2), and Downtown Mixed Commercial (DMC). The proposed density changes would increase allowable densities by 3 or 4 FAR (floor area ratio), equivalent to three or four times the property area of a given site. Within the affected area, maximum heights under Alternative 1 would increase by up to:

- 135 feet in the central DOC 1 zone;
- 100 feet in all of the northern DOC 2 and DMC zones in the Denny Triangle;
- 40 and 48 feet (approximately 30 percent increase) in the central DMC zones along 1st Avenue between Pike and Virginia Streets, and in the Western Avenue vicinity, respectively; and
- 72 feet (30 percent increase) in the southern DOC 2 zone, and the DMC zone along 1st Avenue between Union and Columbia, adjacent to the central office core.

Alternatives 2 and 3 consist of height and density increases in fewer areas or lesser amounts of change. Alternative 2 (Concentrated Office Core) would limit changes to the Downtown Office Core zones. Alternative 3 (Residential Emphasis) would increase height and density in most of the office core zones, but would re-orient zoning in some areas to better encourage housing production.

The **Preferred Alternative** would increase densities in the DOC 1 and much of the DOC 2 office core to levels comparable to Alternative 1, and would increase densities in fewer of the DMC zones. It would also increase maximum heights in several of these zones to a higher level than defined in Alternative 1, with highest height limits oriented to

developments including housing. New controls on building bulk would also be adopted to encourage slimmer building profiles.

Proponent	City of Seattle
Lead Agency	City of Seattle Department of Planning and Development 700 Fifth Avenue, Suite 2000 Seattle, WA 98104-5070
Responsible Official	Diane Sugimura
Date of Implementation	The City Council anticipates making decisions on this proposal in 2005.
Contact Person	Dennis Meier City of Seattle Dept. of Planning and Development 700 Fifth Avenue, Suite 2000 Seattle, WA 98104-5070 206-684-8270
Required Approvals	Actions on the proposal will require approval by the City Council.
EIS Authors and Principal Contributors	Primary author, EIS coordination City of Seattle Dept. of Planning and Development staff: Dennis Meier, Gordon Clowers, Lish Whitson Real Estate/Economic consultants Craig Kinzer & Associates The Seneca Group Cushman & Wakefield Heartland Transportation consultant Parsons Brinckerhoff Quade & Douglas, Inc. Urban Design consultant Otak, Inc.
Location of Background Data	City of Seattle Dept. of Planning and Development 700 Fifth Avenue, Suite 2000 Seattle, WA 98104-5070
FEIS Date of Issuance	January 6, 2005
Nature and Date of Final Action	The City Council is expected to take action in 2005 on the proposal to amend the allowable heights and densities within portions of Downtown.
Availability of Final EIS	Copies of the Final EIS are available for public review at several branches of the Seattle Public Library. Interested parties may obtain copies of the Final EIS at DPD, 20 th floor Key Tower, 700 Fifth Avenue.

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ELEMENTS OF THE ENVIRONMENT

Earth	Not Reviewed
Air Quality.....	Not Reviewed
Water	Not Reviewed
Plants and Animals.....	Not Reviewed
Energy	Reviewed
Natural Resources.....	Not Reviewed
Environmental Health—Noise	Not Reviewed
Environmental Health—Toxic/hazardous materials	Not Reviewed
Environmental Health—Risk of Explosion.....	Not Reviewed
Land Use.....	Reviewed
Height/Bulk/Scale	Reviewed
Housing	Reviewed
Population and Employment	Reviewed
Historic Preservation	Reviewed
Light and Glare.....	Not Reviewed
Public View Protection.....	Reviewed
Transportation	Reviewed
Parking	Reviewed
Fire/Emergency Protection.....	Not Reviewed
Police Protection.....	Not Reviewed
Schools	Not Reviewed
Parks and Recreation	Not Reviewed
Water Supply	Reviewed
Stormwater Utilities	Reviewed
Sewer	Reviewed
Solid Waste.....	Not Reviewed
Maintenance	Not Reviewed
Communications	Not Reviewed
Other Governmental Services/utilities	Not Reviewed
Shadows on Open Spaces.....	Reviewed

Chapter One

Description of the Preferred Alternative

CHAPTER ONE

DESCRIPTION OF THE PREFERRED ALTERNATIVE

Overview

Public policies and regulations promote multiple objectives for Downtown Seattle and govern the patterns of land use and development in complex ways. The City's policies promote both employment and residential purposes in Downtown, with priorities that include a dense office core, an active retail core, areas with mixed uses and some areas, such as Belltown, that are primarily oriented to residential development. Zoned height and density limits set a "building envelope" within which future development can occur. City policies support transitions that step down the zoning in intensity from the most intensive office core areas to the less-intensive peripheral areas of Downtown.

The regulatory environment is further layered by bonus provisions that require certain levels of performance in addressing impacts (such as the effects of new development on the need for affordable housing and social services) in order to reach the highest levels of permissible heights and densities. The ability to transfer development rights (TDR) is another feature of the Downtown zoning that affords some flexibility in obtaining development rights from other properties, often to promote public objectives such as historic preservation.

Given the multiple objectives that pertain to commercial/employment growth and residential growth Downtown (along with various urban design and functional objectives), changes in zoning must be carefully conceived to maintain a rational system that does not create unintended consequences. Regulations that would unduly restrict Downtown development or make it economically unfeasible are not the intent of City policy.

Analysis for the EIS has confirmed that there is considerable potential for accommodating future growth Downtown. The Preferred Alternative will help shape that growth in ways that will create better environments, whether oriented to commercial uses, residential uses or both.

New Preferred Alternative

Following publication of the Draft EIS, the Mayor's Office and DPD developed a new Preferred Alternative that is distinct from the other Alternatives studied in the Draft EIS (see Figure 1). This Preferred Alternative is informed by findings of the Draft EIS, public response to the Draft EIS, comprehensive and neighborhood planning principles, and additional analyses of financial feasibility and building bulk controls. It is meant to be a balanced zoning solution that will encourage continued employment growth in the core of Downtown while also ensuring sufficient capacity for future residential growth. This will encourage the further evolution of an active, round-the-clock, safe and vital environment for living that is essential to the Mayor's vision for Downtown and the "Center City."

The following information describes the key objectives of the Preferred Alternative and key actions that will help fulfill those objectives.

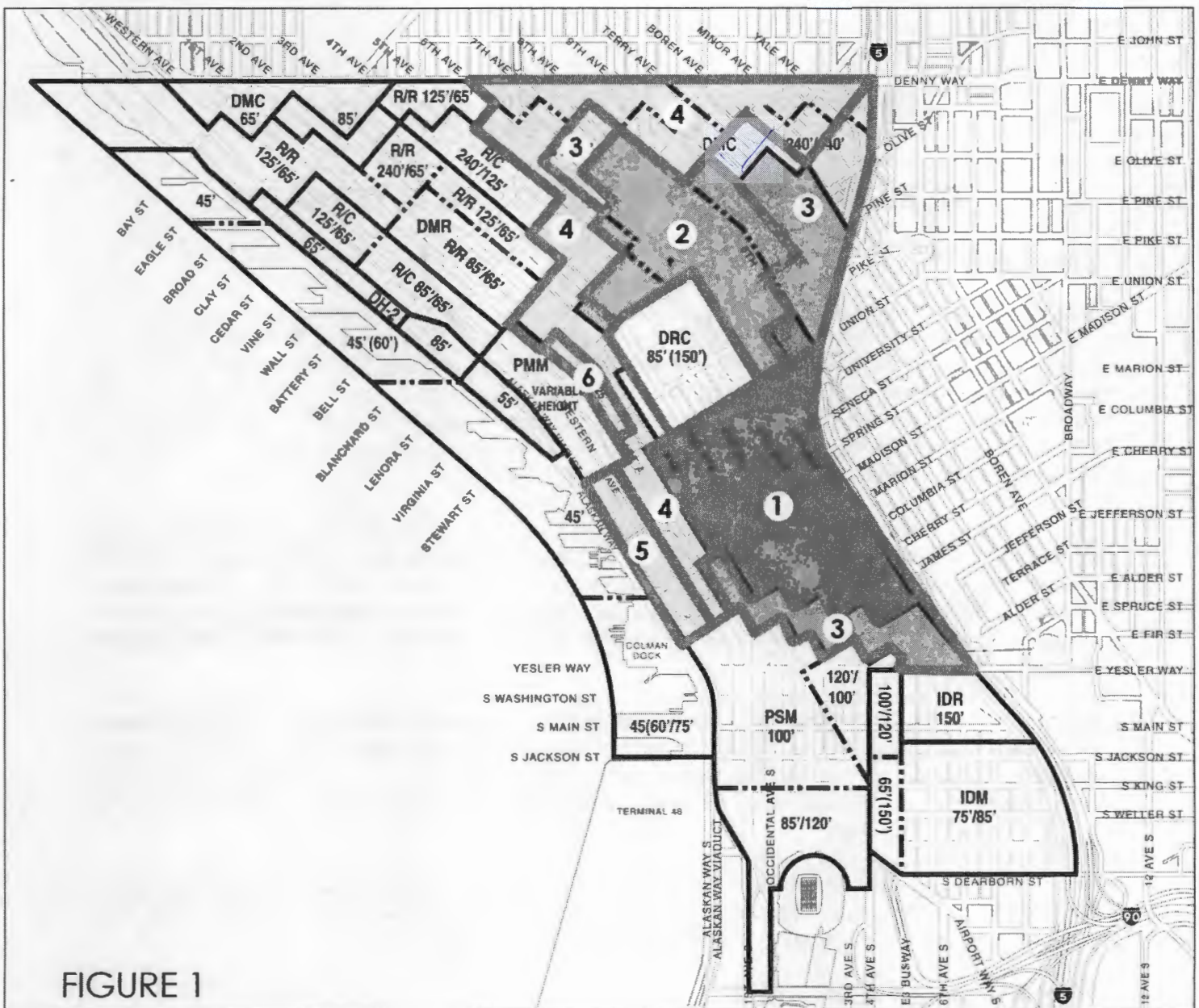


FIGURE 1

Preferred Alternative

1 OFFICE CORE

- increase maximum FAR from 14 to 17
- increase height limit from 450'/540' to 700'

2 OFFICE CORE EXPANSION AREA

- increase maximum FAR from 10 to 14
- increase height from 300'/360' to 600'

3 DMC 340/400

- increase heights to 340' for commercial and 400' for residential and mixed use projects
- increase maximum FAR from 7 to 10 in DMC areas

4 DMC 240/400

- 240' height limit for commercial and 400' for residential and mixed use projects
- maintain existing maximum FAR of 7

Note: Two half-blocks between Pine and Union Sts. on Second Avenue have been included in the study area for this Final EIS.

5 DMC 160/240

- increase height from 160' to 240' for residential and mixed use projects
- maintain existing maximum FAR of 7 and 160' height limit for commercial projects

6 DMC 125

- no change



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SCALE IN 100 FEET

Key Objectives of the Preferred Alternative

Key objectives of the Preferred Alternative and associated actions are summarized below:

1. Enhance opportunities for housing development to create a vital mixed-use Downtown environment, reduce sprawl in the region, and protect the city's existing residential neighborhoods.

Key actions:

- Provide a height incentive for residential and mixed-use projects in DMC areas and some DOC 2 areas to be reclassified to the DMC zone. In most of these areas, the maximum height limit for residential/mixed-use structures would be 400 feet.
- Maintain existing height and density limits for commercial use in selected DMC areas where housing is to be emphasized to keep residential development a viable option.
- Increase commercial density limits in other selected areas (DOC 1, DOC 2 and some DMC areas) to concentrate commercial growth and prevent high-density commercial development from encroaching into housing areas.
- Establish commercial development rights transfer in DMC areas to create more opportunities for housing on sending sites.

2. Accommodate as broad a range of household incomes as possible

Key actions

- Establish provisions for affordable housing mitigation (generally workforce housing for households with incomes up to 80% of median income) in high-rise residential structures by allowing larger floorplates and additional floor area above a base height limit for projects contributing to the program.
- Eliminate the Denny Triangle Transfer of Development Credits program and replace it with a housing affordability incentive.
- Maximize commercial development's use of housing bonus/TDR programs by:
 1. maintaining the current base FAR limits in all zones and eliminating the option to gain the first FAR above the base FAR without participating in housing/childcare bonus/TDR programs;
 2. raising the maximum FAR limits in DOC 1, DOC 2 and some DMC areas, in areas where concentrated employment growth is desired, thereby increasing the amount of floor area gained through housing bonus/TDR programs; and
 3. eliminating options to reach the maximum FAR in DMC zones without participation in some action related to housing development or improving neighborhood character, such as using commercial TDR to create new residential sites, open space TDR, low-income housing TDR, landmark TDR, or contributing to the housing/child care bonus/TDR programs.

3. Maintain Downtown Seattle as the major regional employment center and concentrate employment growth where it can best be served by transit

Key actions

- Increase height and FAR for commercial projects in DOC 1, northern DOC 2, and DMC areas in the Denny Triangle on the edge of the office core, and retain existing limits elsewhere.
- Eliminate the commercial parking requirement to support transit use.

4. Help ensure that added height promotes less bulky development for both residential and non-residential projects

Key actions

- Establish bulk controls, including maximum average floorplate sizes and building width dimensions for residential development in DMC areas.

- Increase height substantially for commercial projects in areas where commercial FAR is increased to help prevent squat, bulky structures; replace current upper-level development standards with simpler, more flexible bulk controls.

5. Provide a transition in development intensity and scale between the office core and adjacent neighborhoods

Key Actions

- Create a DMC transition zone that includes some DOC 2 areas on the eastern and southern edges of the office core and some DMC 240 areas in the Denny Triangle to address transition with Capitol Hill, Pike/Pine, South Lake Union/Denny Park, and Pioneer Square.
- Maintain the current 125-foot height limit for all uses in the DMC zone along the eastern edge of Pike Place Market.
- Maintain “stepping down” of height along waterfront in the DMC zone west of Post Alley.

6. Promote historic preservation

Key Actions

- Raising maximum FAR limits in DOC 1, DOC 2 and some DMC areas and eliminating some of the bonus options that can now be used in the first FAR above the base FAR increases the amount of floor area that can be gained through landmark TDR; and
- Allowing the use of landmark TDR while limiting other options for increasing FAR above the base in other DMC zoned areas.
- Consider further measures, such as funding TDR bank established in 2001 for landmark preservation.

7. Simplify the Downtown Code

Key actions

- Eliminating complicated interim Code provisions that allow use of either new or old bonus/TDR programs
- Establishing simpler bulk controls
- Eliminating bonuses for features no longer contributing to priority public benefits
- Eliminating minimum parking requirements

The Preferred Alternative's overall approach is to update and reinforce the purposes of Downtown zoning through strategic changes that will:

- Accommodate continued job growth and concentrate employment in the core, where it can be best served by transit;
- meet Downtown housing objectives by providing additional incentives for residential and mixed-use development;
- provide sensible building bulk controls that promote improved building design and contribute to a positive urban environment;
- continue to provide for historic preservation and open space needs; and
- maintain a reasonable hierarchy and relationship among the Downtown zones that will be consistent with the intent of City's comprehensive and neighborhood planning.

The Preferred Alternative retains consistency with the policy directions of comprehensive and neighborhood planning while updating the zoning provisions to better direct future Downtown growth. The current emphasis on a dense office core, complemented by an active retail core, surrounded by mixed-use areas that transition to lower densities at the periphery is retained by the proposed zoning system. However, areas

intended for future office core development are more tightly defined, while areas intended for mixed uses, including residential development, are better clarified by the proposed zoning. Additionally, the proposed changes will provide more flexibility and space for better architectural design of buildings, which should encourage slimmer and better proportioned building forms. The net result of the proposed changes, then, will be a better pattern of growth in Downtown as a whole, as well as better-looking buildings.

Height and Density: Compared to Alternative 1, the Preferred Alternative defines higher height limits in several zones and similar increases in density within the office core, but also proposes no changes in density in some areas and lesser density increases than Alternative 1 in other areas (see Table 1 below). The proposed density limits in the DOC 1 and most of the DOC 2 office core zones would be 17 and 14 FAR, respectively, which would be increases of 3 and 4 FAR over the current limits (same as Alternative 1). This would help encourage infill development and efficient use of available sites within the portion of Downtown with the densest development pattern. These proposals also intended to enhance the use of development incentives by better integrating permitted development densities with the revisions to the bonus and transfer of development rights (TDR) programs adopted in 2001 as part of an early phase of zoning changes implementing Downtown neighborhood plans.

The approach supports a "grow-from-the-core" future development pattern that foresees expansion of the office core northward with a surrounding vicinity oriented to mixed commercial uses in DMC zones. In some of the DMC zones within the Denny Triangle, a denser pattern of employment growth (up to 10 FAR in density) will be accommodated by the proposed zoning. Additionally, some existing DOC 2 areas (in the northeastern corner of the Denny Triangle and along the southern edge of the office core near Yesler Way) will be reclassified to this DMC zone, retaining their current commercial FAR to maintain development intensities similar to existing conditions while providing a transition between the portions of the office core where commercial densities are proposed to be increased, and less-intensive adjacent neighborhoods. In other portions that extend around the northern and western edges of the office core, a DMC zone with unchanged maximum densities may encourage a more residentially-oriented mix of uses. In both versions of these DMC zones, a higher maximum height limit—generally 400 feet for residential and mixed-use development—may also encourage more future development of housing.

The Preferred Alternative's approach to height limits provides more flexibility to arrange building bulk into taller forms, particularly for residential and mixed-use development. In many of the DMC zones, the same amount of density allowed today could be designed within a taller building envelope that would extend up to 400 feet. In DMC zones where commercial densities would increase to 10 FAR, heights for non-residential structures would be increased to 340 feet, while in most other DMC zones the height limit for these structures would be 240 feet—an increase in areas within the Denny Triangle where the limit is currently 125 and 160 feet.

Near the waterfront, east of the Viaduct, height limits for the DMC zones would be raised from 160 to 240 feet for residential and mixed-use projects, while the current height and maximum density for commercial uses would be retained. This type of DMC zone would continue to provide for a stepdown in height and density in areas near Elliott Bay, as is currently the case. Also providing for a stepdown in height and density would be the existing DMC zone with a 125-foot height limit near the Pike Place Market, which would be retained with no changes.

Table 1
Preferred Alternative

ZONE	Base FAR (no change)	Existing Maximum FAR	Proposed Maximum FAR	Existing Height Limits	Proposed Height Limits
DOC 1 (commercial core)	6	14	17	450'/540'	700'
DOC 2 (west of 9th Ave)	5	10	14	300'/360'	600'
DOC 2 (east of 9th Ave)	Reclassified to DMC 340'/400'				
DOC 2 (southern edge of Commercial Core)	Reclassified to DMC 340'/400'				
DOC 2 (1/2 block west of 3rd Ave in Belltown)	Reclassified to DMC 240'/400'				
DMC 340/400 (includes about half the existing DMC 240 areas in Denny Triangle and DOC 2 areas east of 9 th Ave in Denny Triangle and southern edge of Commercial Core)	5	7 in existing DMC areas 10 in existing DOC 2 areas	10	240' in existing DMC areas (312' with TDC in Denny Triangle) 240'/288' and 300'/330' in existing DOC 2 areas (390' for residential and mixed use with TDC in Denny Triangle)	340' for commercial uses; 400' for residential and mixed use
DMC 240/400	5	7	7	125', 160', 240' (162.5, 208', and 312' for residential and mixed use with TDC in Denny Triangle)	240' for commercial uses; 400' for residential and mixed use
DMC 160/240 (Western edge of Commercial Core)	5	7	7	160'	160' for commercial; 240' for residential and mixed use
DMC 125 Pike Place Market	5	7	7	125'	125'

Note: All FAR increases above base FAR to maximum FAR gained through current bonus/TDR provisions with 75%-25% split between housing/child care and non-housing options. The exception is the DMC 240/400 zone, where the increase could be gained through use of commercial TDR, landmark TDR, low-income housing TDR, or open space TDR, or the 75%-25% split.

Bulk Controls: The approach to bulk controls in the Preferred Alternative is to set higher maximum height limits that will stretch the building envelope vertically, allowing for less bulky structures to accommodate the increases in maximum density. The length of facades that can extend uninterrupted along street edges area is also limited. For residential use, specific limits are set on the size of floors and maximum dimensions of facades, above prescribed elevations, to promote less bulky towers.

In general, under the Preferred Alternative, the increased densities proposed in the office core zones and higher height limits for residential and mixed-use projects are expected to result in fewer new structures overall relative to development under existing conditions and other alternatives, with the greatest concentration of larger structures in the DOC 1 zone in the Commercial Core and in the DOC 2 area between 6th and 9th Avenues and along the Olive Way/Pine Street corridor in the Denny Triangle. On larger development sites, allowing taller structures may require fewer structures, or at least fewer structures built to the maximum height allowed, to accommodate the permitted commercial density, potentially resulting in massing on the site that appears less compact, and with the taller portions of structures able to be sited more to the center of the site, rather than to be pushed out closer to the street edges.

Taller residential structures are expected to occur in the DMC 240/400 zone extending along the western edge of the Commercial Core and southern edge of Belltown, with additional tall residential structures appearing on the periphery of the Denny Triangle. With the greater height limits, there is more variation in the skyline profile under the Preferred Alternative compared to the "tabletop" profile that is expected under existing conditions.

Bonus/TDR Provisions: For the most part, the Preferred Alternative advances neighborhood plan proposals to provide for increases in maximum commercial density limits that would allow greater use of floor area bonus and transfer of development rights (TDR) programs that mitigate the impacts of new development by providing for such public benefits as affordable housing, child care, open space, landmark preservation and transit facilities. Incentives for affordable housing and other priority features are maximized by:

- proposing the highest maximum FARs analyzed in the Draft EIS for DOC 1, most of DOC 2, and some DMC areas;
- maintaining base FARs at their current levels in all zones;
- eliminating a provision in DOC 1 and DOC 2 zones that allows the first full FAR above the base FAR to be gained through non-housing related bonuses or TDR; and
- reducing the bonus options available in DMC zones consistent with neighborhood plan priorities.

For those DMC areas where the maximum FAR would be increased from 7 to 10, the current option to use a variety of non-housing related bonus and TDR options to gain all additional floor area above the base FAR to the maximum FAR would be replaced by the same provisions that would apply in DOC 1 and DOC 2 zones, which establish housing incentives as a priority.

Commercial development rights transfer, a new form of TDR, is introduced for DMC areas as an incentive to promote residential development. Sites in this zone that are committed to residential development can transfer their unused commercial development rights to sites in DMC areas where current density limits are maintained. In these DMC areas, incentives that promote housing, including the creation of housing sites through commercial TDR, or incentives that contribute to conditions supporting a residential environment, such as open space TDR or landmark TDR, would provide the means for gaining the floor area between the base and maximum FAR limits.

The Preferred Alternative also introduces a new proposal to provide height and bulk incentives for residential uses to contribute to affordable housing programs. Contributions to an affordable housing mitigation program would be required for a residential project to build to the maximum height and bulk allowed.

Rezoning: In order to carry out stated development objectives, the Preferred Alternative includes proposals for zoning reclassifications in several areas. These include:

- Portions of existing DOC 2 300' areas, primarily in the northeast corner of the Denny Triangle, and one block of DOC 1 in the Commercial Core (the Convention Center), and the DOC 2 240' area on the southern edge of the Commercial Core would be reclassified to DMC 340'/400'. The base and maximum FAR limits in this zone would be the same as they currently are in DOC 2. By maintaining these density limits, the area will continue to provide for a transition in the intensity of development between the office core, where maximum density limits are proposed to be increased, and less-intensive neighboring areas.
- A one-half block area currently zoned DOC 2 300' on the west side of Third Avenue between Stewart and Virginia Streets would be reclassified to DMC 240'/400'. This action would reduce the commercial density permitted, from the current maximum of 10 FAR to a maximum of 7 FAR, and the permitted height for a commercial project would be reduced from 300 feet to 240 feet. However, the height allowed for a residential or mixed-use building would be increased to 400 feet. This proposal is intended to accommodate a better transition between the office core to the east, where height and density limits are substantially increased, and the mixed-use corridor along Second Avenue.
- Two half-blocks along the eastern side of Second Avenue between Pine and Union Streets currently zoned Downtown Retail Core (DRC) are proposed to be reclassified to DMC 240'/400'. These half-blocks are currently covered by a special provision that allows a residential structure to exceed the current height limit of 150 feet by 30%, or up to 195 feet. The proposed reclassification to DMC would allow a residential structure to extend to 400 feet. Permitted densities for commercial uses would increase from the current maximum of 5 FAR to a new maximum of 7 FAR, and commercial structures would be subject to a 240-foot height limit. The proposal is intended to recognize changes in the shifting boundaries of the retail core, which has gravitated eastward, and to encourage redevelopment, especially with mixed-use and housing, along this edge. The proposed reclassification to DMC 240'/400' would also promote development that is compatible with what is allowed elsewhere along the Second Avenue corridor—much of which is currently zoned DMC 240' and under the Preferred Alternative is now proposed to be DMC 240'/400'.

Chapter Two

Description of Alternatives 1, 2, 3 & 4

CHAPTER TWO

DESCRIPTION OF ALTERNATIVES 1, 2, 3 and 4

Introduction

This EIS studies ~~three~~ five alternatives for ~~possible changes to~~ height and density regulations within portions of the Downtown Urban Center (including a newly-defined Preferred Alternative described in Chapter 1 of this Final EIS), ~~and a No Action Alternative~~. These changes, if adopted, would influence the maximum height and size of future building projects allowed in the Commercial Core, Denny Triangle and on the an-edge of Belltown. ~~None of the alternatives have been chosen as a preferred alternative.~~ Rather, This EIS is intended to analyze the impact implications of alternative courses of action, for the benefit of decisionmakers, agencies and interested citizens.

OVERALL OBJECTIVES

The following are general objectives of the alternatives studied in this EIS.

- Designate adequate zoned development capacity in the Downtown Urban Center to encourage long-term residential and commercial growth and economic development in a manner consistent with Downtown's position as the largest urban center in the metropolitan area.
- Define regulatory requirements that will encourage development consistent with the City's Comprehensive Plan and neighborhood plans, and will support Downtown's vibrant urban character. Make changes that will aid in realizing a mix of low, moderate and market rate affordable housing throughout Downtown, particularly in areas intended to be "residential enclaves."
- Study possible changes to height and density regulations in selected Commercial Core (particularly Office Core zones), Denny Triangle and Belltown portions of Downtown.
- Determine how to best accommodate growth while maintaining a functional transportation system, including the street network, transit, and non-motorized modes of travel. Similarly, determine how to best accommodate growth while maintaining the function and capacity of utility systems, including but not limited to electrical energy, water, sewer and stormdrain systems.
- Achieve a high quality urban environment that can accommodate high-density development while ensuring livability and enhancing Downtown's positive existing characteristics.

All of the Alternatives analyzed provide sufficient development capacity to accommodate projected growth for the next 20 years and beyond, ~~of projected growth~~. The various actions proposed under any of the Alternatives are not expected to influence the amount of growth occurring in the affected area within this timeframe. The proposed changes may influence the distribution of growth within the study area and the character of development that accommodates it, and these conditions are analyzed in this EIS to help decisionmakers evaluate different approaches to managing the next 20 years of Downtown growth.

REGULATORY FRAMEWORK

The regulatory context of Downtown includes its Urban Center designation, the City's Comprehensive Plan (and relationship to State growth management requirements), neighborhood plans, land use policies, the Land Use Code and other procedural requirements such as master use permits and design review.

The City's **Comprehensive Plan**, "*Toward a Sustainable Seattle*," is a 20-year policy plan completed in 1994 that articulates a vision of how Seattle will grow. The Comprehensive Plan makes policy choices and provides a flexible framework for adapting to real conditions over time. The Comprehensive Plan emphasizes an "urban village" strategy seeking to promote and reinforce the pattern of residential and employment growth in larger urban centers and several smaller "urban village" neighborhood districts spread throughout the city. The Plan includes 20-year growth targets for the urban centers and villages. The Comprehensive Plan satisfies requirements of the State's Growth Management Act and fits within King County's framework of Countywide Planning Policies. The Urban Center designation for Downtown is part of the regional growth strategy outlined in the Countywide Planning Policies calling for the concentration of a significant share of the region's employment and housing growth within a limited number of urban centers linked together by high capacity transit. In addition, the City's Comprehensive Plan includes numerous **Land Use Policies** that help define the basis for the City's zoning and Land Use Code regulations.

Following adoption of the City's Comprehensive Plan, approximately 37 **neighborhood plans** were prepared through the Neighborhood Planning Office to address future conditions in subareas in and around urban centers and villages. Within Downtown, five neighborhood plans were prepared for Belltown, Denny Triangle, Commercial Core, Chinatown/International District, and Pioneer Square. Also, an overall plan addressing the entire Downtown Urban Center was prepared. The alternatives in this EIS include actions to implement recommendations included in these neighborhood plans.

The **Land Use Code** contains extensive land use and zoning regulations addressing the various zones within the City, including several distinct zones defined for Downtown. The Land Use Code defines numerous requirements for future development, such as setbacks, allowable heights and densities, and parking requirements to name a few. Applications for development are reviewed through the City's Master Use Permit (MUP) process, and often go through the "design review" process that provides for public input and City input on how a development is designed, with the intent of improving overall design quality.

Certain other land use regulatory concepts are defined within the Code, such as "transfer of development rights" (TDR), bonus features, and "transfer of development credits" (TDC). These are concepts that allow for some flexibility in the amount of development that can occur in different Downtown locations.

- ***TDRs*** allow transfer of unused portions of allowable density from one property to another. TDRs can help preserve desirable features such as landmark structures, affordable housing, and public open space that otherwise might be threatened by redevelopment.
- ***Bonus features*** allow additional height or density to be obtained if a developer provides features or amenities that have public benefit or offset impacts.
- ***TDC*** is a program that allows a developer to purchase development rights from rural lands in King County **and contribute to neighborhood amenities** to gain additional density in portions of Downtown, to aid in preservation of rural land and accommodate more residential growth in Downtown.

Several sections in **Draft EIS** Chapter 3 and selected appendices further discuss the alternatives' relationship to plans and policies.

BACKGROUND

The proposal to consider changes to zoned height and density arises from neighborhood plans for the Denny Triangle and Commercial Core neighborhoods, as well as the overall urban center plan prepared by the Downtown Urban Center Planning Group (DUCPG). These plans contain visions, goals, policies

and action recommendations to achieve the vision for future growth in the Downtown Urban Center. All of the plans include objectives of promoting vibrant, diverse mixed-use neighborhoods containing housing for households of all income ranges, as well as objectives for open space, urban design character, transportation and other matters. These plans recommend changes to zoning and land use regulations to promote their objectives.

The Commercial Core, Denny Triangle and DUCPG plans all included proposals for increasing the capacity of the Downtown area, intended to accommodate further employment and residential growth, stimulate residential development and provide resources for affordable housing. To implement these proposals, major revisions to the incentive zoning Downtown were recommended, including an overhaul of the bonus and TDR programs to reprioritize their focus on achieving housing goals. In the Commercial Core Plan, interim height and density increases through a "super bonus" were also proposed to capture opportunities for increasing development density and the use of incentives during the economic boom underway at the time. Permanent height increases were also proposed to promote less bulky development and achieve other urban design objectives. The Denny Triangle Plan included recommendations for permanent height and density increases for all zones in that neighborhood.

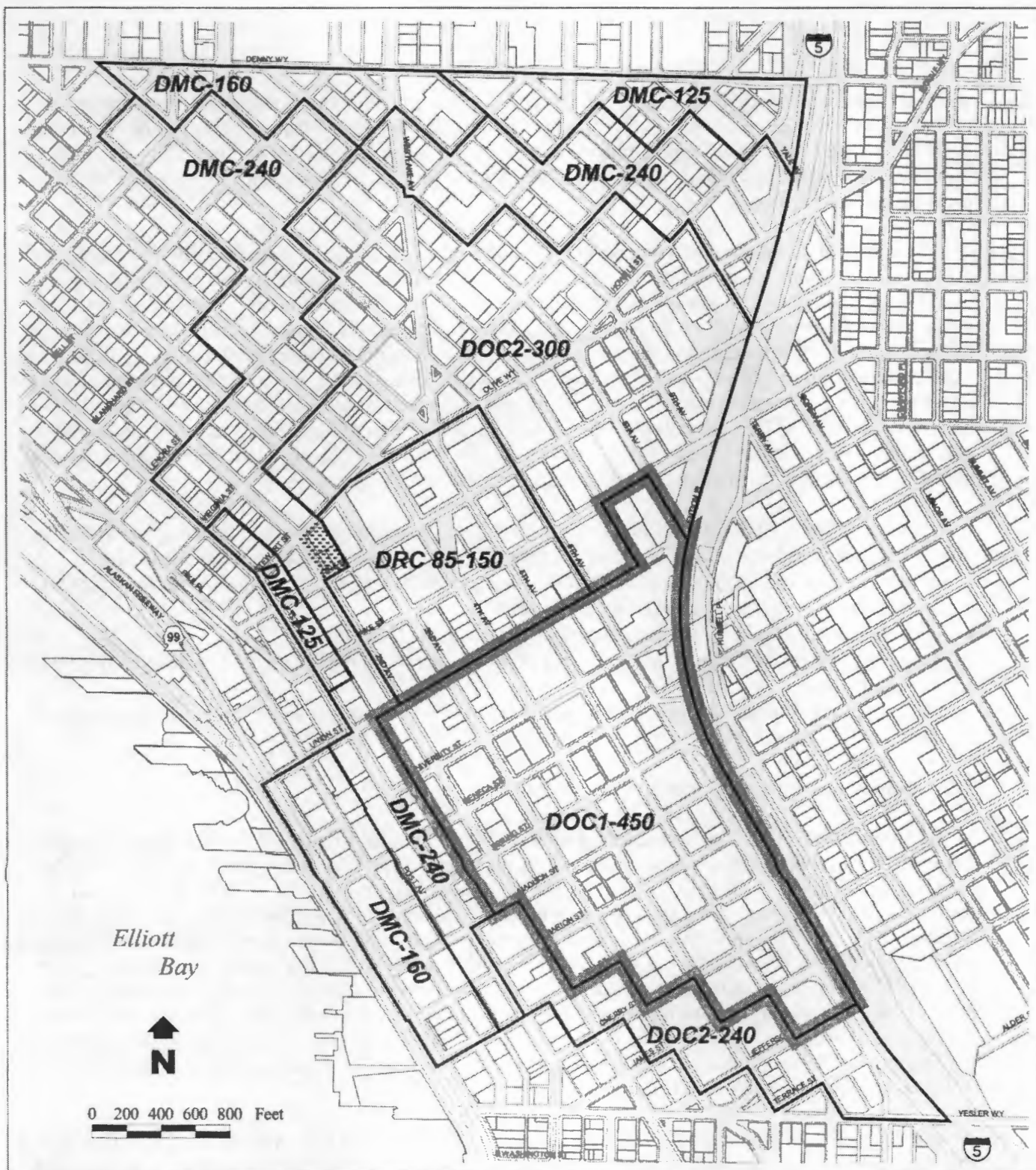
Immediately following the City Council's approval of the Downtown neighborhood plans in early 1999, a limited number of proposals were implemented through revisions to the Land Use Code, including:

- expanding the use of TDR to allow mixed-income structures including low- and low-moderate income housing to qualify as TDR sending sites;
- removing some density restrictions on residential use in the DOC 1 zone;
- rezoning portions of Pioneer Square and the northwest corner of the retail core to promote mixed use development; and
- amending the Pioneer Square Preservation District provisions to better promote neighborhood development objectives.

The locations where these changes apply are shown on Figure 2.

In November of 1999, the City enacted the Transfer of Development Credit (TDC) program in the Denny Triangle to allow height and density increases as an incentive for residential development. The TDC program allows up to a 30 percent increase above mapped height limits for residential and mixed-use projects that purchase conservation credits from rural properties in King County and contribute to an amenity credit fund for open space and Green Street improvements consistent with the Denny Triangle Neighborhood Plan. The program also establishes a partnership with King County for ongoing public investment in amenities in the area, in conjunction with the purchase of development credits by private developers. Also as part of the TDC legislation, an area of approximately 4.5 acres adjacent to the office core zoned Downtown Mixed Commercial 240 (DMC 240) was rezoned to Downtown Office Core 2 300' (DOC 2 300') to expand the office core and increase capacity for commercial development. Figure 3 shows the areas affected by these changes.

As part of the City's ongoing neighborhood plan implementation activities in 2000 and 2001, City staff met frequently with an advisory committee of Downtown stakeholders to discuss regulatory changes that would further support and foster the types of changes advocated by the neighborhood plans. As a result of this work, additional proposals for addressing height and density increases were recommended for further consideration. These proposals were documented in a report entitled, "City of Seattle TDR/Bonus Program Review Advisory Committee Recommendations," dated May 31, 2000.



CHANGES IMPLEMENTED FOLLOWING APPROVAL OF DUCPG PLAN
February 1999

FIGURE 2

Reduced Restrictions on Residential Density in DOC1

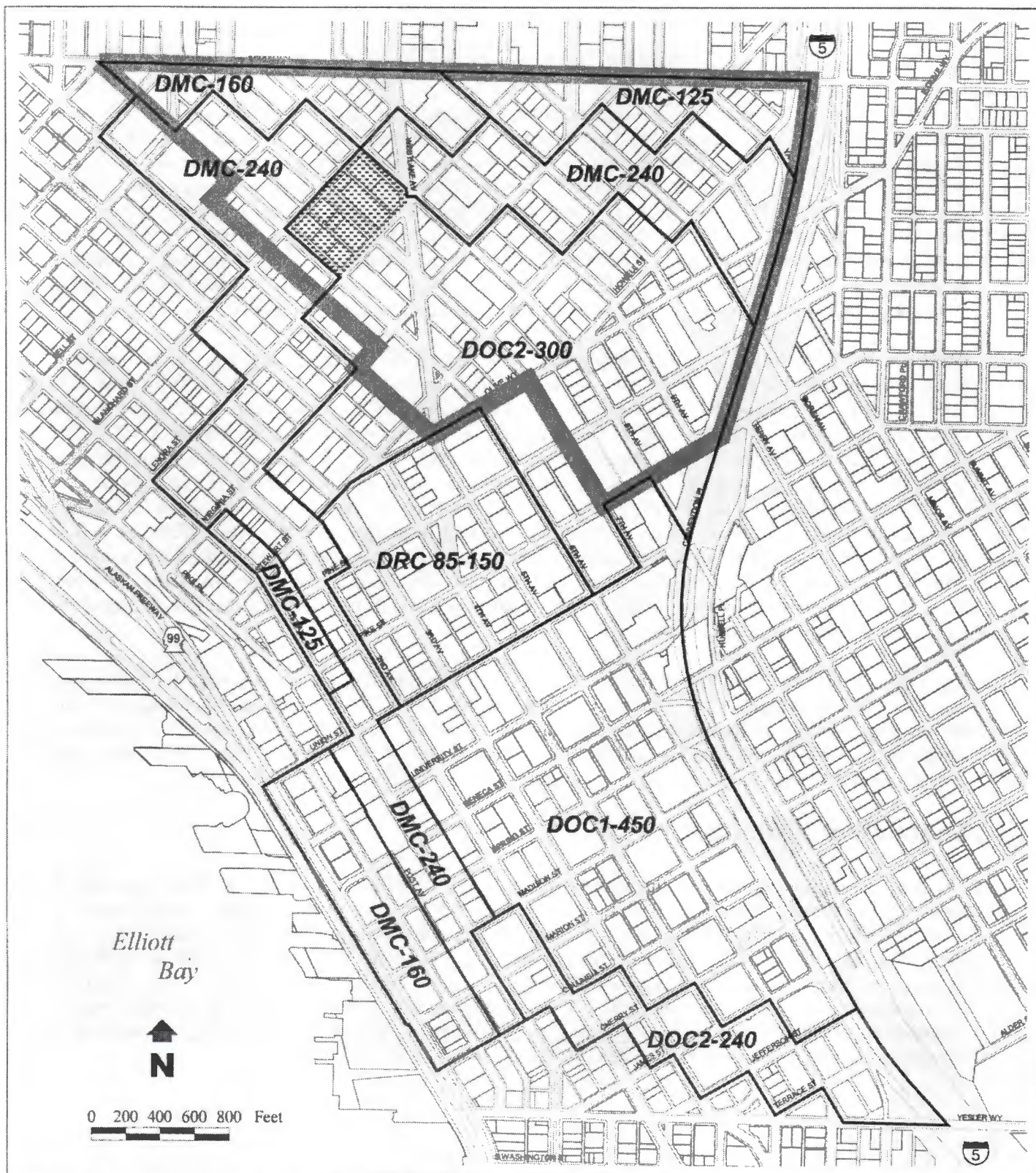
Rezone Portion of Retail Core (DRC 85-150) to DMC-240

Note: Extend eligible TDR sending sites to include mixed income housing with units affordable to households with incomes up to 80% of median.

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 City of Seattle
 May 17, 2002

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downtownheightchangesinducpg2.apr



CHANGES IMPLEMENTED WITH ADOPTION OF TRANSFER OF DEVELOPMENT CREDIT (TDC) PROGRAM November 1999

FIGURE 3

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May 17, 2002

-  Denny Triangle TDC Area: 30% height increase above existing mapped limits (and additional 37.5' and 90' depending on zone) for mixed use and residential projects
-  Rezone Area: Approximately 5.5 acres of DMC-240 rezoned to DOC2-300

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dennytrianglechanges/tcdc2.apr

Upon reviewing the breadth of these requested changes, the decision was made to first pursue revisions to the bonus and TDR provisions of the Downtown incentive zoning, within the context of the existing maximum density limits. Because this set of changes did not substantively change the permitted density or location of future development, environmental review proceeded with expeditious review and issuance of a Determination of Non-Significance. In July 2001, the City Council adopted revisions to the bonus and TDR provisions, as well as: 1) related increases to the base FAR limits in the office core (DOC 1 and DOC 2) and retail core (DRC) zones; 2) allowances for increasing height by 10 or 20 percent, without any increase in permitted density, in specified areas of the DOC 1 and DOC 2 zones; and 3) limited adjustments to height and bonus provisions in the DRC retail core zone (see Figure 4).

Proposals for increasing maximum density limits and height limits are a second set of actions now proceeding through the SEPA process to assess potential adverse impacts on the Downtown area. On May 3rd, 2001, the Strategic Planning Office issued a Determination of Significance indicating that an environmental impact statement (EIS) will be prepared for this proposal. In preparation for this EIS, City staff examined the neighborhood plans and advisory committee recommendations, considered the input from interest groups and citizens during the EIS scoping process, and defined alternatives that cover a range of possible actions. One of these alternatives includes proposed regulatory changes that collectively represent the maximum extent ("high-end") of changes requested by the neighborhood plans, as well as additional recommendations made by a citizen advisory committee convened to guide the development of proposals undertaken in the first phase. The other alternatives include a No Action Alternative, and two intermediate alternatives defining different options for height and density changes that could support the City's and neighborhoods' goals.

City staff conducted a "scoping" period for this EIS, to receive public comments about EIS study topics and definition of alternatives. Several citizens and groups submitted written and verbal comments during the scoping period. A formal scoping meeting was held on May 23rd, 2001, and a general forum summarizing Downtown planning activities was held on May 16th, 2001. These comments were considered in defining the alternatives and elements of the environment studied in this EIS.

Location of Proposal

The proposal affects portions of the Downtown area generally bounded by Denny Way, Interstate 5, Yesler Way, Alaskan Way, as well as Lenora Street and 5th Avenue in the Belltown vicinity (refer to Figure 1). The areas most affected by the proposal include the following zones: Downtown Office Core (DOC 1 and DOC 2), and Downtown Mixed Commercial (DMC). While the proposals are primarily focused on the Commercial Core and Denny Triangle neighborhoods, edges of the Belltown neighborhood zoned DMC 240' and DOC 2 300' are also included in the study area. Under the Preferred Alternative, a change is also proposed for an area of two half-blocks on the western edge of ~~No changes are proposed to the Downtown retail core (DRC) zone. in any of the alternatives.~~

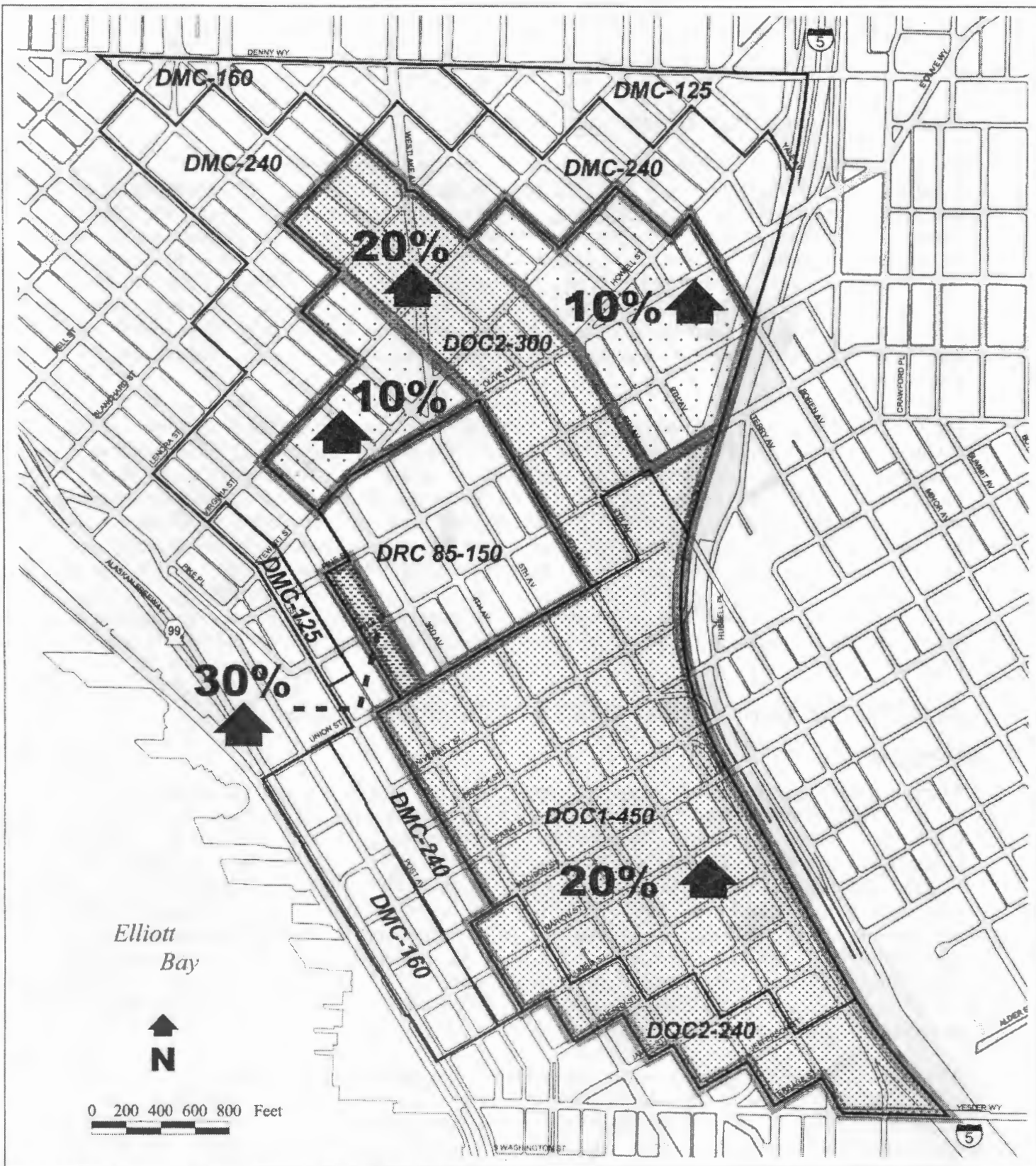


FIGURE 4

CHANGES IMPLEMENTED WITH ADOPTION OF REVISED BONUS/TDR PROVISIONS July 2001

- 10% Height Increase in Portions of DOC2-300
 - 20% Height Increase in DOC1 and Portions of DOC2
 - 30% Height Increase on Western Edge of Retail Core (DRC)
- Base density limit increased by 1.0 FAR in DOC1 and DOC2 and 0.5 FAR in DRC.

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May 20, 2002

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Description of Alternatives 1, 2, 3 and 4

This EIS examines a total of ~~four~~ five alternatives. ~~that cover a range of possible actions.~~ The Preferred Alternative is a new alternative included in this Final EIS, representing the Mayor's recommendation for changes in height and density (refer to Chapter 1 for more details). ~~Three of the Alternatives 1, 2 and 3~~ consist of different sets of changes in allowable maximum height and density of development (measured by floor area) in several Downtown zones. Alternative 4—the “No Action” Alternative—is also included to assess what is likely to occur over time if no changes are made to the Land Use Code. This “baseline” alternative assumes that projected development will occur under the height and density limits that now apply (including July 2001 amendments) to accommodate changes to the bonus and TDR provisions that apply to zones in the study area. A summary and comparison of the alternatives is provided in Table 6 on page 2-24.

For all of the Alternatives, the same amount of residential and commercial growth is assumed to occur within the study area over the 20-year planning horizon. This amount, approximately 63,000 additional jobs and 7,350 additional residential units, represents a relatively high forecast of 20-year growth. Preliminary economic analysis indicated that this level of growth could be accommodated under existing zoning conditions, and that changes to zoning would not alter the demand for residential and commercial space generating the growth. Consequently, even though the actions proposed in different alternatives may add capacity for future growth, the actual demand for additional commercial space and residential units is expected to be the same for the 20-year study period. Therefore, the differences between alternatives are not in the overall amount of growth accommodated, but rather in how the same amount of growth may be accommodated differently in terms of the number, size, location and type of projects required.

ALTERNATIVE 1 – HIGH END HEIGHT AND DENSITY INCREASE

Overview

Alternative 1 is a composite of the initial recommendations for height and density increases included in Downtown neighborhood plans, supplemented by later recommendations from the Bonus/TDR Advisory Committee. As such, it represents the higher-end of possible changes to height and density, related to concepts from the Denny Triangle Neighborhood Plan (refer to Figure 2) and the Commercial Core Neighborhood Plan (refer to Figure 3), with the support of the DUCPG Downtown Urban Center Plan. It also includes recommendations from the TDR/Bonus Program Review Advisory Committee for consideration of additional changes (not from neighborhood plans) on the edges of Belltown and within the Commercial Core neighborhood (refer to Figure 4). The primary intent of proposals for increasing height and density limits is to: 1) provide sufficient zoned capacity to accommodate continued residential and employment growth Downtown, 2) stimulate housing production, and 3) provide resources to increase the supply of affordable housing.

Alternative 1 proposes the greatest magnitude of changes in height and density studied in this EIS, for areas including all of the Denny Triangle, most of the Commercial Core, and the southern and eastern edges of the Belltown neighborhood. Specific proposals from each of the sources of Alternative 1 are presented below. For the purposes of EIS analysis, those recommendations calling for the highest increases to height and density limits in an area were incorporated in this alternative.

Commercial Core. Both the Commercial Core Neighborhood Plan and the DUCPG Downtown Urban Center Plan include a proposal for a “super bonus” that was intended to allow height and density increases during the peak of the last economic cycle as an incentive to stimulate housing production. As initially proposed, the super bonus concept would have applied on an interim basis in the DOC 1, DOC 2 and DMC 240 zones of the Commercial Core, allowing increases in the base and maximum floor area ratio

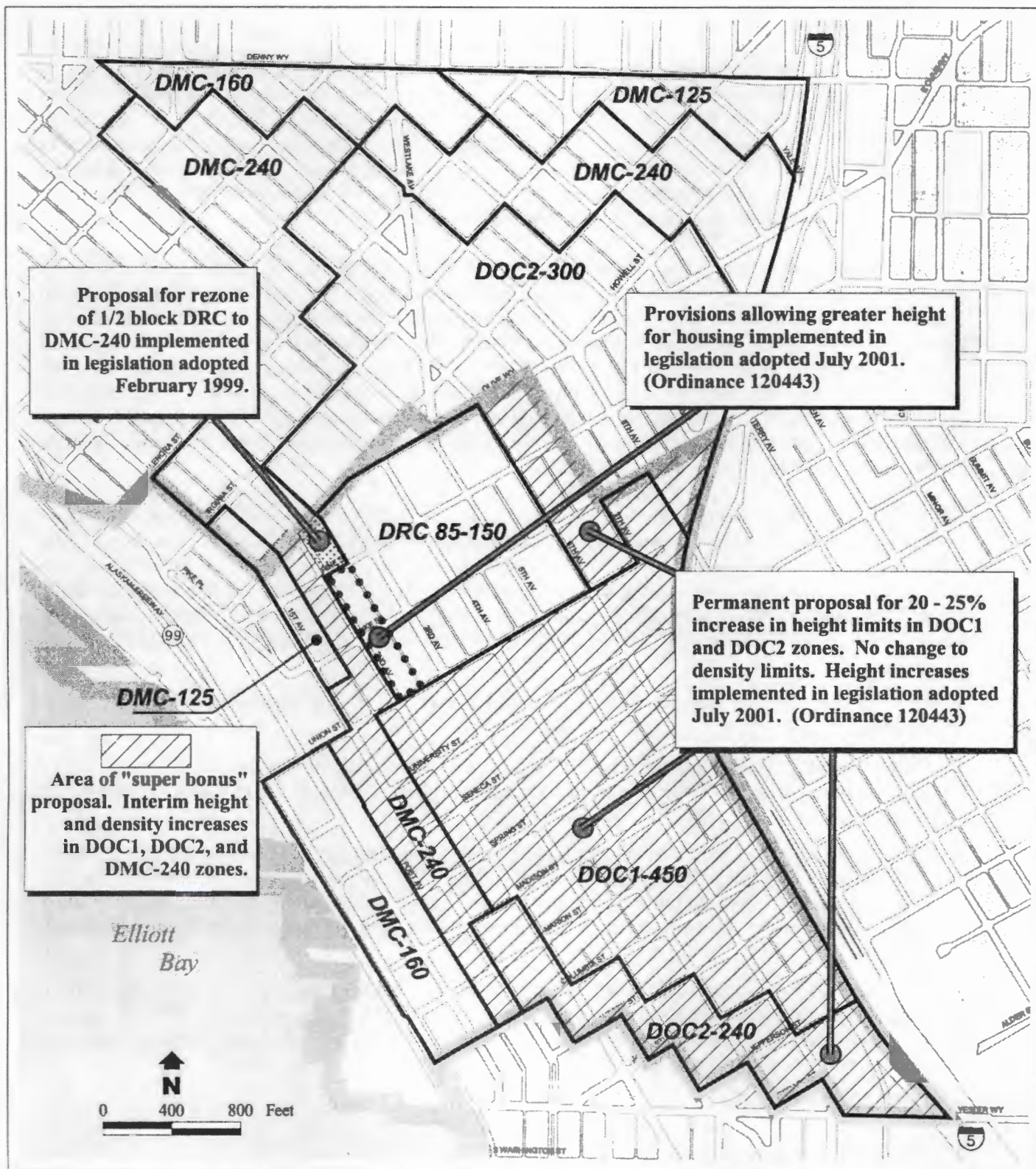
(FAR) limits and a 30% height increase for projects including a specified housing incentive bonus package. Proposals for permanent changes to height controls in the Commercial Core Plan were limited to increasing height limits by 20 to 25% in the DOC 1 and DOC 2 zones though a building height variance, while maintaining "current FAR provisions to control overall building bulk." This proposal was implemented as part of the legislation amending the Downtown bonus/TDR provisions adopted by Council in July 2001, and therefore is represented in Alternative 4: No Action. Proposals from the Commercial Core Neighborhood Plan are presented on Figure 5.

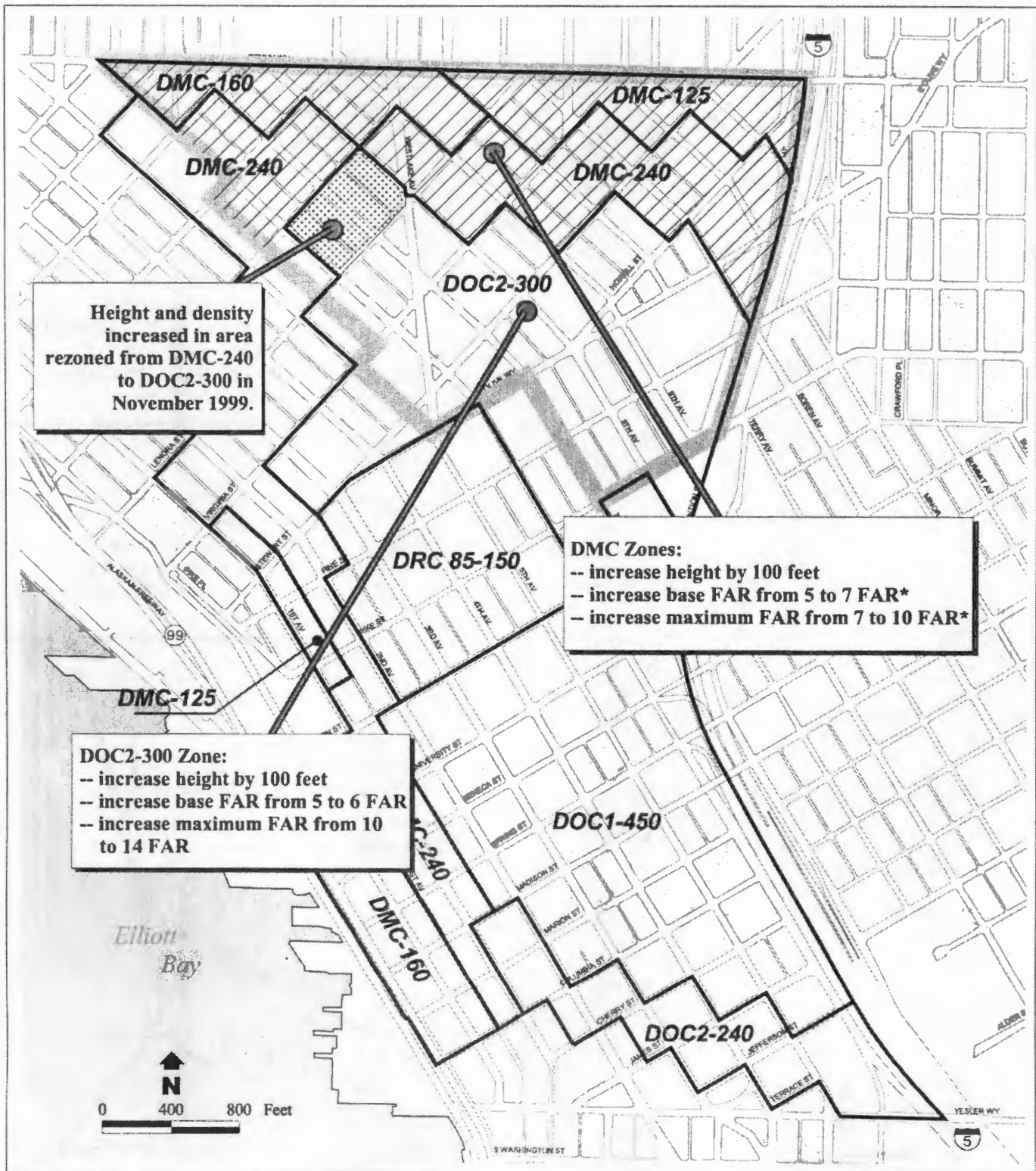
Denny Triangle. The Denny Triangle Neighborhood Plan calls for increasing height limits in all zones in that neighborhood by 100 feet. This Plan also includes proposals for specific increases to base and maximum FAR limits in the DOC 2 zone, with increases also to be considered in all DMC zones. The proposed increases were not linked to a super bonus and were intended to be permanent. The extent of the height increases, which in some areas represent an 80% increase above existing limits, and the intended purpose to increase capacity for both employment and residential development, would supplant the existing transfer of development credits (TDC) provisions, which only allow a 30% height increase and limit the incentive to residential and mixed-use developments. Proposals from the Denny Triangle Neighborhood Plan are presented on Figure 6.

Bonus/TDR Advisory Committee. The recommendations of the TDR/Bonus Program Review Advisory Committee included proposals for increasing height and density limits in the DOC 1, DOC 2 and DMC 240 zones, as called for in the Commercial Core "super bonus" proposal, but on a permanent rather than interim basis. Furthermore, increasing height and density limits was recommended throughout all DMC zones "consistent with requirements developed for other zones." The report, "Advisory Committee Recommendations," dated May 31, 2000 calls for consideration of the following increases to height and density limits:

- DOC 1 Zone: 2 FAR increase in base FAR and 3 FAR increase in Maximum FAR; 30% height increase.
- DOC 2 Zone: 2 FAR increase in base FAR and 3 FAR increase in Maximum FAR; 30% height increase (note: these are lower than recommendations in Denny Triangle Plan for DOC 2 zone in that neighborhood).
- DMC Zone: Consider increases in height and density throughout the DMC zones; for the area north of Union, not in Denny Triangle, consider mirroring TDC program features as the DMC zone is further considered for additional height/density consistent with requirements developed for other zones. (note: density increases not specified; does not address any changes to DMC zones in Denny Triangle).
- DRC Zone: 1 FAR increase in Base FAR; replace 85-foot height limits with 150-foot height limits; consider increase above 150 feet for housing only (up to 30% increase in height). (note: changes to height and density limits in the DRC Zone were implemented under previous legislation related to revisions to bonus/TDR bonus programs).
- DMR Zone: no change.

The location of these proposed changes are shown on Figure 7.





Height and Density Increases Recommended in DENNY TRIANGLE NEIGHBORHOOD PLAN

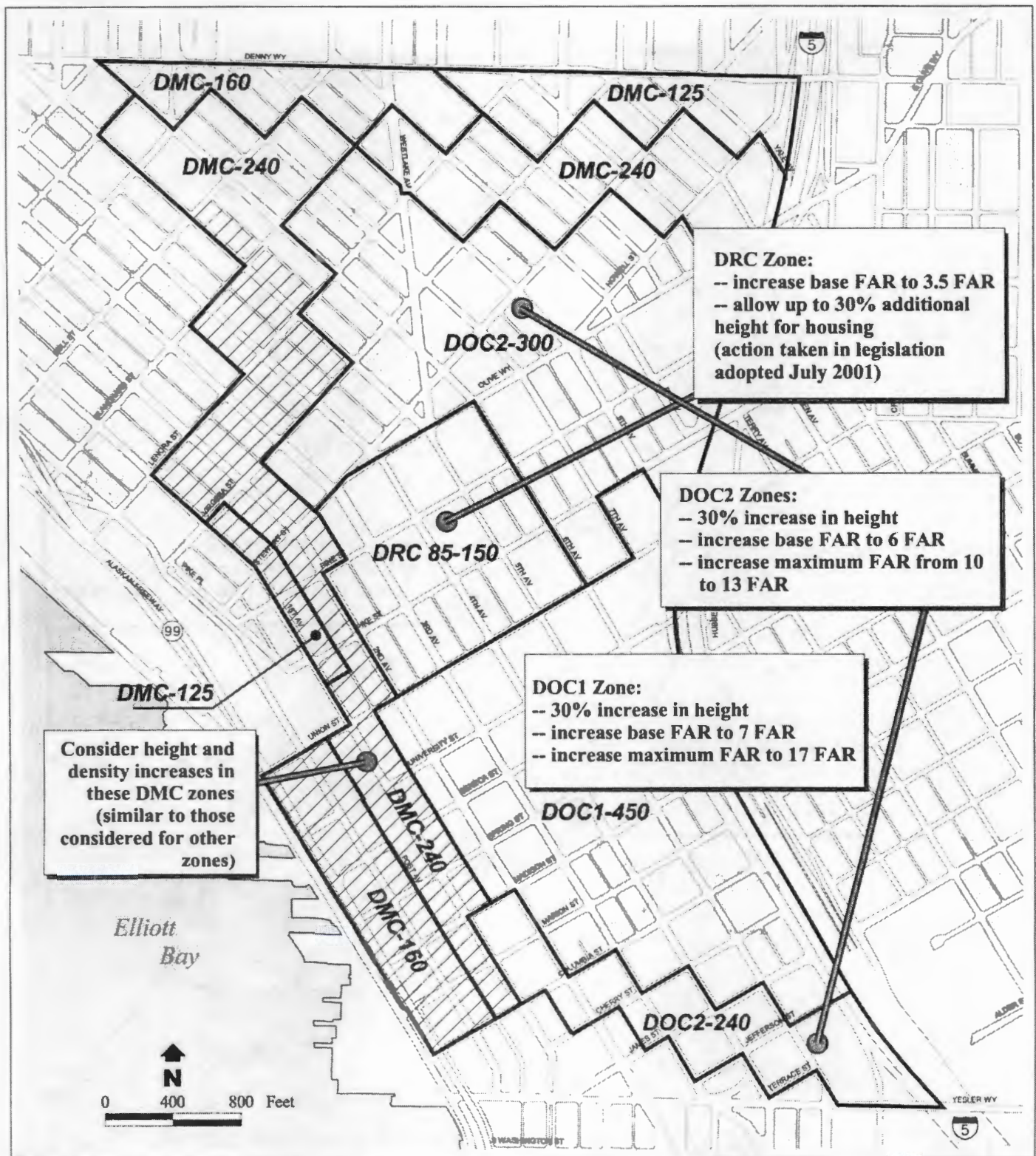
FIGURE 6

Denny Triangle Urban Center Village Boundary

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May 20, 2002

*The Denny Triangle Plan does not provide a specific proposal for an increase to FAR limits in DMC zones. The 7 FAR base and 10 FAR maximum represent increases that are proportionately similar to those proposed in the Plan for the DOC2-300 zone.

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Height and Density Increases Recommended for Further Consideration by BONUS/TDR ADVISORY COMMITTEE

FIGURE 7

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Alternative 1 Height and Density Changes

The proposed height and density changes in Alternative 1 would add 72-135 feet and 3-4 FAR (floor area ratio¹) to the office core zones, and would also extend similar increases to DMC zones across the rest of the Denny Triangle neighborhood south of Denny Way (see Figure 8). Given the existing height limits of 125-240 feet of zones in this area, the proposed heights would represent an increase of 40-80% in allowable heights; the proposed increases of 3-4 FAR would represent an increase of 30-43% in allowable density.

Alternative 1 also includes a proposal for a 30% increase in height and 3 FAR increase in density (over the existing 7 FAR) for the Downtown Mixed Commercial (DMC) zones at the periphery of the office and retail cores. These areas include the southern edge of Belltown, the area east of the Pike Place Market, and the 1st Avenue and Western Avenue corridors. Existing height limits in these areas are 125 feet, 160 feet, and 240 feet.

Height: Within the affected area, maximum height limits would increase by:

- 135 feet in the central DOC 1 zone;
- 100 feet in all of the northern DOC 2 and DMC zones in the Denny Triangle;
- and 48 feet (30% increase) in the central DMC zones along 1st Avenue between Pike and Virginia Streets, and in the Western Avenue vicinity, respectively; and
- 72 feet (30% increase) in the southern DOC 2 zone, the DMC zone on the southern edge of Belltown and along 2nd Avenue on the western edge of the retail core, and the DMC zone along 1st Avenue between Union and Columbia, west of the central office core.

Density: The proposed density increases for this alternative would increase maximum FAR by 3 (additional floor area equal to three times the area of a given site) in most areas and by 4 in the Denny Triangle DOC 2 zone. Specific proposed density and height changes for the various zones are summarized on Table 2, below.

Bonus/TDR provisions. Under Alternative 1, all floor area above the new base FARs in the DOC 1, DOC 2 and DMC zones would be gained through bonuses and/or the transfer of development rights (TDR) according to a split that requires 75% of the additional floor area to be gained through affordable housing TDR, payment to an affordable housing/child care fund, and/or a bonus for providing affordable housing. The remaining 25% can be gained through other eligible bonuses or TDRs, including specified open space and on-site amenities, human services, open space TDR, variable scale TDR, and landmark TDR, within the limits and conditions prescribed in the Code. In the DMC zone, the current option to use the newly adopted bonuses and TDR provisions establishing the 25%/75% split, or to use the bonus options available prior to this amendment, would be eliminated. Also, the provision that now allows a wider range of bonus choices to be used to gain the first FAR above the base FAR in the DOC 1 and DOC 2 zones would be eliminated.

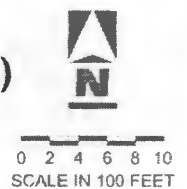
¹ Floor area ratio is a measure of allowable building density. On any given site, the FAR value multiplied by the site area is the total floor area allowed to be built. On a 10,000 square foot site, an FAR of 5 allows a 50,000 square foot building.



Alternative 1: High End Height and Density Increases (Downtown Neighborhood Plans and Advisory Committee Proposals)

1. EXISTING OFFICE CORE
 - increase maximum FAR from 14 to 17
 - increase height limit from 450' to 585'
2. OFFICE EXPANSION AREA/DENNY TRIANGLE
 - increase maximum FAR from 10 to 14
 - increase height limit from 300' to 400'
3. OFFICE EXPANSION AREA/SOUTH DOWNTOWN
 - increase maximum FAR from 10 to 13
 - increase height limit from 240' to 312'
4. COMMERCIAL MIXED USE AREA/DENNY TRIANGLE
 - increase maximum FAR from 7 to 10
 - increase height limits by 100' (125' to 225', 160' to 260', 240' to 340')
5. COMMERCIAL MIXED USE AREA/
SOUTH BELLTOWN AND COMMERCIAL CORE
 - increase maximum FAR from 7 to 10
 - increase height limits by 30% (125' to 165', 160' to 208', 240' to 312')

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Table 2
Alternative 1—High End Height and Density Increases

ID #	Location	Existing Zone	Maximum Density (FAR)		Maximum Height (feet)	
			Existing	Proposed	Existing	Proposed
1	Commercial Core <i>Advisory Committee Recommendation as permanent action; Comm. Core and DUCPG Plan recommendation as interim "super bonus" proposal</i>	DOC 1 – 450'	14	17	450 ft.	585 ft.
2	Denny Triangle—office expansion area <i>Denny Triangle Neighborhood Plan recommendations</i>	DOC 2 – 300'	10	14	300 ft.	400 ft.
3	Commercial Core—southern edge <i>Advisory Committee Recommendation as permanent action; Commercial Core and DUCPG Plan recommendation as interim "super bonus" proposal</i>	DOC 2 – 240'	10	13	240 ft.	312 ft.
4	Denny Triangle—mixed use area <i>Denny Triangle Neighborhood Plan recommendations</i>	DMC – 125' DMC – 160' DMC – 240'	7 7 7	10* 10* 10*	125 ft. 160 ft. 240 ft.	225 ft. 260 ft. 340 ft.
5	Commercial Core—1st and 2nd Avenue Corridor <i>Advisory Committee Recommendation as permanent action; Commercial Core and DUCPG Plan recommendation as interim "super bonus" proposal</i>	DMC – 240'	7	10	240	312 ft.
6	Commercial Core—western edge, Belltown—southern and eastern edges <i>TDR/Bonus Advisory Committee Recommendation</i>	DMC – 125' DMC – 160' DMC – 240'	7 7 7	10 10 10	125 ft. 160 ft. 240 ft.	165 ft. 208 ft. 312 ft.

* The Denny Triangle Plan does not include a specific proposal for increase to maximum FAR in DMC zones; 10 FAR represents an increase that is proportionally similar to what the Plan proposes for the DOC 2 Zone.

TDC=Transfer of Development Credits. DOC=Downtown Office Core. DMC=Downtown Mixed Commercial.

ALTERNATIVE 2 – CONCENTRATED OFFICE CORE

Overview

Alternative 2 would limit height and density changes to the existing office core zones, DOC 1 and 2. Zoning would not change in the DMC zones peripheral to the office core, where it is desirable to balance residential and employment growth and maintain a gradual transition between the concentrated development intensity in the office core zones and surrounding neighborhoods of Belltown, the Harborfront, Pike/Pine and South Lake Union (see Figure 9). Height increases through the TDC program would still be possible, to provide height incentives for mixed-use and residential development in the

DMC zones of the Denny Triangle. However, the 100-foot height increase in the Denny Triangle DOC 2 zone would displace TDC provisions for height increases in that zone.

Alternative 2's theme is that greater height and density for office/commercial development is most preferable in central core areas where Downtown zoning favors high concentrations of development and there is sufficient infrastructure to accommodate growth. Within the office core zones of the Commercial Core, the proposed changes in height and maximum density are the same as for Alternative 1. In the Denny Triangle, the maximum density in the DOC 2 zone would increase by 3 FAR rather than the 4 FAR increase proposed in Alternative 1. The concentrated office core theme is similar to concepts of urban growth expressed in past Downtown land use planning, emphasizing continued concentration of higher-density employment growth and redevelopment within the existing DOC 1 core, with limited expansion into adjacent DOC 2 areas, primarily in the Denny Triangle.

Alternative 2 Height and Density Changes

Height: Within the affected area, maximum heights would increase by:

- 135 feet in the central DOC 1 zone;
- 100 feet in the northern DOC 2 zone; and
- 72 feet (30% increase) in the southern DOC 2 zone.

Density: The proposed density increases for Alternative 2 would increase maximum FAR by 3. However, no density changes would occur in the DMC zones in the Denny Triangle, Commercial Core or Belltown edge. Specific proposed density and height changes are summarized in Table 3.

Table 3
Alternative 2—Concentrated Office Core

ID #	Location	Existing Zone	Maximum Density (FAR)		Maximum Height (feet)	
			Existing	Proposed	Existing	Proposed
1	Commercial Core	DOC 1 – 450'	14	17	450 ft.	585 ft.
2	Denny Triangle—office expansion area	DOC 2 – 300'	10	13	300 ft.*	400 ft.
3	Commercial Core—southern edge	DOC 2 – 240'	10	13	240 ft.	312 ft.
4	Denny Triangle—mixed use area and Belltown—southern edge	DMC – 125'	7	7	125 ft.*	No change
		DMC – 160'	7	7	160 ft.*	No change
		DMC – 240'	7	7	240 ft.*	No change
5	Commercial Core—western edge	DMC – 125'	7	7	125 ft.	No change
		DMC – 160'	7	7	160 ft.	No change
		DMC – 240'	7	7	240 ft.	No change

Notes: *Height increases up to 30% above mapped height are allowed in the Denny Triangle through the TDC program. TDC = Transfer of Development Credits. FAR = floor area ratio. DOC = Downtown Office Core. DMC = Downtown Mixed Commercial.



FIGURE 9

Alternative 2: Concentrated Office Core

1. EXISTING OFFICE CORE
 - increase maximum FAR from 14 to 17
 - increase height limit from 450' to 585'
2. OFFICE EXPANSION AREA/DENNY TRIANGLE
 - increase maximum FAR from 10 to 13
 - increase height limit from 300' to 400'
3. OFFICE EXPANSION AREA/SOUTH DOWNTOWN
 - increase maximum FAR from 10 to 13
 - increase height limit from 240' to 312'

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0 2 4 6 8 10
SCALE IN 100 FEET

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Bonus/TDR provisions. Under Alternative 2, no changes to current base FARs are proposed. All floor area above the base FAR would be gained through bonuses and/or transfer of development rights (TDR) according to a split that requires 75% of the additional floor area to be gained through affordable housing TDR, payment to an affordable housing/child care fund, and/or a bonus for providing affordable housing. The remaining 25% can be gained through other eligible bonuses or TDRs, including specified open space and on-site amenities, human services, open space TDR, variable scale TDR, and landmark TDR, within the limits and conditions prescribed in the Code. In the DMC zone, the current option to use the newly adopted bonuses and TDR provisions establishing the 25%/75% split, or to use the bonus options available prior to this amendment, would be eliminated. Also, the provision that now allows a wider range of bonus choices to be used to gain the first FAR above the base FAR in the DOC 1 and DOC 2 zones would also be eliminated.

ALTERNATIVE 3 – RESIDENTIAL EMPHASIS

Overview

Alternative 3 places a greater emphasis on regulatory changes tailored to specific areas to help encourage provision of housing. This alternative's theme supports increased height and densities in the office core zones, but with transitions in development intensity provided by sub-areas of variable height and density limits in the DOC 2 zones in Belltown and the eastern portion of the Denny Triangle. While the TDC program would be displaced for a portion of the DOC 2 zone in the Denny Triangle allowing the greatest increase in commercial density, the program would continue to provide height incentives limited to housing and mixed use projects in other DOC 2 and DMC areas of the Denny Triangle (see Figure 10).

In Downtown areas peripheral to the office and retail core, maximum commercial densities would not increase, but would be reduced in some areas by rezoning to designations that promote residential development and limit commercial development. In addition to increasing residential capacity, the intent of regulatory changes in these peripheral areas is to provide zoning that will: 1) ensure a concentration of housing consistent with neighborhood plan objectives for creating "enclaves" of residential development in the north central portion of the Denny Triangle, 2) increase the emphasis on housing and promote a more compatible residential scale of development along the southern edge of Belltown to extend the predominantly residential character emerging throughout the rest of the neighborhood, and 3) encourage mixed uses by requiring housing in projects developed to maximum commercial density limits in other DMC zones within the study area. The latter objective would occur by making non-residential density (above the base density) contingent upon providing on-site housing.

Alternative 3 Height and Density Changes

Height: Within the affected area, maximum heights would increase by:

- 135 feet in the central DOC 1 zone;
- 100 feet in the portion of the DOC 2 zone in between 8th Avenue and 5th/6th Avenues; and
- 72 feet (30% increase) in the southern DOC 2 zone;

Density: In the DOC 1 and approximately half of the Denny Triangle DOC 2 zone, the maximum density would increase by 3 FAR. In other portions of the DOC 2 zone, the maximum density would remain unchanged. Densities in DMC zones would not change, but portions of the DMC zone in north central Denny Triangle and the southern edge of Belltown would be rezoned from DMC to Downtown Mixed Residential/Commercial (DMR/C). With this zone, the maximum density would decrease from 7 to 4 or 5. This is summarized in Table 4.

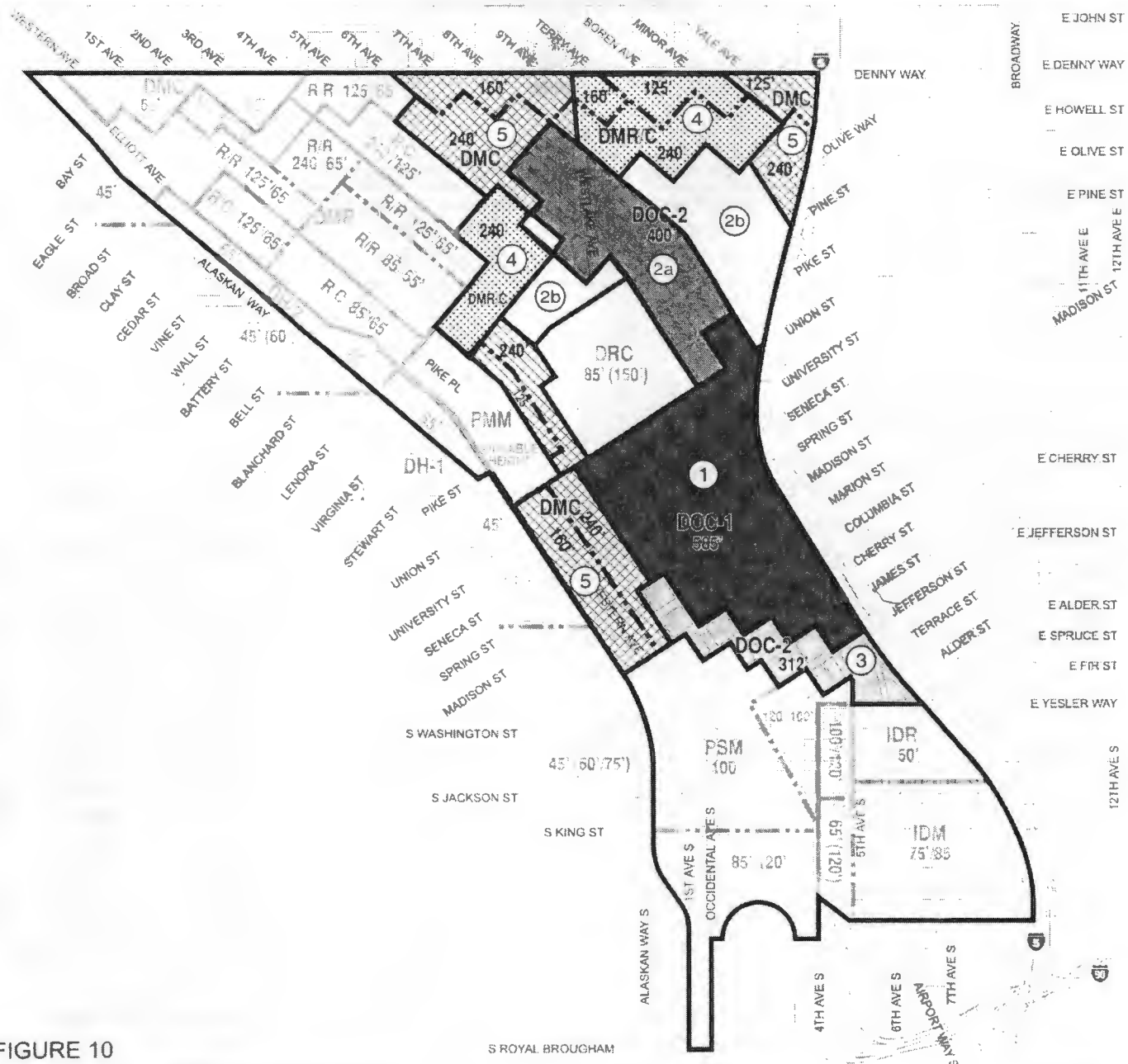


FIGURE 10

Alternative 3: Residential Emphasis

1. EXISTING OFFICE CORE
 - increase maximum FAR from 14 to 17
 - increase height limit from 450' to 585'
- 2a. OFFICE EXPANSION AREA/DENNY TRIANGLE
 - increase maximum FAR from 10 to 13
 - increase height limit from 300' to 400'
- 2b. OFFICE EXPANSION AREA/DENNY TRIANGLE
 - no change to maximum FAR of 10
 - no change: 300' height limit can be increased by 30% through TDC or by 10% under specified conditions
3. OFFICE EXPANSION AREA/SOUTH DOWNTOWN
 - increase maximum FAR from 10 to 13
 - increase height limit from 240' to 312'
4. RESIDENTIAL MIXED USE AREA
 - rezone to DMR/C
 - maximum FAR reduced from 7 FAR to 4 or 5 FAR, depending on height limit
 - existing height limits retained (125', 160', 240'); 30% height increase allowed in Denny Triangle through TDC
5. COMMERCIAL MIXED USE AREA
 - maximum FAR remains 7 FAR, but increases above base 5 FAR requires that housing be included on-site.
 - existing height limits retained (125', 160', 240'); 30% height increase allowed in Denny Triangle through TDC

Faded text
No change from existing conditions

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Table 4
Alternative 3—Residential Emphasis

ID	Location	Existing Zone (zone change in bold)	Maximum Density (FAR)		Maximum Height (feet)	
			Existing	Proposed	Existing	Proposed
1	Commercial core	DOC 1 – 450'	14	17	450 ft.	585 ft.
2a	Denny Triangle—office expansion, 5 th to 8 th	DOC 2 – 300'	10	13	300 ft.*	400 ft.
2b	Denny Triangle —office expansion, between 8 th and Boren	DOC 2 – 300'	10	10	300 ft.*	300 ft.*
	Belltown, office expansion, between 3 rd & 5 th and Olive and Virginia	DOC 2 – 300'	10	10	300 ft.	300 ft.
3	Commercial core—southern edge	DOC 2 – 240'	10	13	240 ft.	312 ft.
4a	Denny Triangle—mixed use area, roughly between Westlake, Howell, and Minor	DMC → DMR/C	7	4	125 ft.*	125 ft.*
		DMC → DMR/C	7	5	160 ft.*	160 ft.*
		DMC → DMR/C	7	5	240 ft.*	240 ft.*
5a	Belltown—southern edge	DMC → DMR/C	7	5	240 ft.*	240 ft.*
4b	Denny Triangle—mixed use areas west of Westlake, and near I-5	DMC – 125'	7	7**	125 ft.*	125 ft.*
		DMC – 160'	7	7**	160 ft.*	160 ft.*
		DMC – 240'	7	7**	240 ft.*	240 ft.*
5b	Commercial core—western edge	DMC – 125'	7	7**	125 ft.	125 ft.
		DMC – 160'	7	7**	160 ft.	160 ft.
		DMC – 240'	7	7**	240 ft.	240 ft.

Notes:

* Height increases up to 30% above mapped height are allowed in the Denny Triangle through TDC.

**Increases in non-residential density above base FAR would be contingent on including on-site housing.

FAR = floor area ratio. TDC = Transfer of Development Credits. DOC = Downtown Office Core.

DMC = Downtown Mixed Commercial. DMR/C = Downtown Mixed Residential/Commercial.

Bonus/TDR provisions. Under Alternative 3, current base FARs would remain for DOC 1 and DOC 2 zones and areas proposed to remain designated DMC. In DMC areas proposed for a DMR/C designation, the base FAR would be reduced from 5 to 1 or 2 FAR, depending on the height limit of the zone. In DOC 1 and DOC 2 zones, all floor area above the base FAR would be gained through bonuses and/or the transfer of development rights (TDR) according to a split requiring 75% of the additional floor area to be gained through affordable housing TDR, payment to an affordable housing/child care fund, and/or a bonus for providing affordable housing. The remaining 25% can be gained through other eligible bonuses or TDRs, including specified open space and on-site amenities, human services, open space TDR, variable scale TDR, and landmark TDR, within the limits and conditions prescribed in the Code. The provision that now allows a wider range of bonus choices to be used to gain the first FAR above the base FAR in the DOC 1 and DOC 2 zones would be eliminated. The DMC zone would continue to allow the option to use the newly adopted bonuses and TDR provisions establishing the 25%/75% split, or to use the bonus options available in this zone prior to this amendment. The DMR/C zone would have more options for gaining floor area above the base FAR, including gaining floor area according to the prescribed 25%/75% split, or through the use of available bonuses for on-site amenities and the full range of TDR choices.

ALTERNATIVE 4 – NO ACTION ALTERNATIVE

Overview

Under the No Action Alternative, the existing zoning and Land Use Code regulations would continue to apply for the foreseeable future (see Table 5). Projected economic growth would continue to generate demand for additional residential and nonresidential development in the City as well as the region. However, this alternative assumes no major changes would be made to further augment the zoned development capacity in the Denny Triangle or Commercial Core, or to increase or reduce the emphasis on particular uses beyond conditions established under current zoning. The general development pattern of a concentrated commercial core surrounded by less intensive mixed-use areas promoted under existing zoning would be maintained.

Current Height and Density Limits

The maximum allowable densities and mapped height limits would continue to apply, with the existing opportunities to gain additional height above these limits (see Figure 11). These include: 10% additional height in DOC 1 and DOC 2 zones when prescribed measures are taken to control the overall bulk of a project; 20% additional height in DOC 1 and some DOC 2 areas with bulk controls and open space provision, landmark preservation or small-scale structures on-site; and up to 30% additional height for residential and mixed-use development through participation in the TDC programs in the Denny Triangle.

Bonus/TDR provisions. Under Alternative 4, in DOC 1 and DOC 2 zones, there are two options for gaining floor area above the base FAR. One option allows additional floor area to be gained through bonuses and/or the transfer of development rights (TDR) according to a split that requires 75% of the additional floor area to be gained through affordable housing TDR, payment to an affordable housing/child care fund, and/or a bonus for providing affordable housing. The remaining 25% can be gained through other eligible bonuses or TDRs, including specified open space and on-site amenities, human services, open space TDR, variable scale TDR, and landmark TDR, within the limits and conditions prescribed in the Code. The other option allows a wider range of bonus choices to be used to gain the first FAR above the base FAR, with any additional floor area gains subject to the 25%/75% split.

In the DMC zone, developers have two choices for increasing floor area above the base FAR. The first is through the use the newly adopted bonuses and TDR provisions establishing the 25%/75% split. The other choice is to use the bonus options available prior to this amendment.



FIGURE 11

Alternative 4: No Action

Existing Regulations

1. OFFICE CORE
 - maximum FAR 14
 - 450' height limit with up to 20% increase allowed (540') under specified conditions
- 2a. OFFICE EXPANSION AREA
 - maximum FAR 10
 - 300' height limit with up to 30% increase allowed through TDC (390') in Denny Triangle or by 20% (360') under specified conditions
- 2b. OFFICE EXPANSION AREA/NORTH DOWNTOWN
 - maximum FAR 10
 - 300' height limit with up to 30% increase through TDC (390') in Denny Triangle or by 10% (330') under specified conditions
3. OFFICE EXPANSION AREA/SOUTH DOWNTOWN
 - maximum FAR 10
 - 240' height limit with 20% increase (288') allowed under specified conditions.
4. COMMERCIAL MIXED USE AREAS
 - maximum FAR 7
 - 125', 160' and 240' height limits; 30% height increase allowed in Denny Triangle through TDC.

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Table 5
Alternative 4—No Action

ID	Location	Zone	Maximum Density (FAR)	Maximum Height (feet)	
				Existing mapped limit	Optional height increases
1	Commercial core	DOC 1 – 450'	14	450 ft.	+20% w/bulk limits and open space, or landmark, small bldg. preservation.
2a	Denny Triangle—office expansion, 5 th to 8 th	DOC 2 – 300'	10	300 ft.	+20% as above, or +30% with TDC
2b	Denny Triangle—office expansion, transitioning east and west	DOC 2 – 300'	10	300 ft.	+10% with bulk limits, or +30% with TDC
	Belltown, office expansion, between 3 rd & 5th	DOC 2 – 300'	10	300 ft.	+10% with bulk limits
3	Commercial core—southern edge	DOC 2 – 240'	10	240 ft.	+20% w/bulk limits and open space or landmark, small bldg. preservation.
4	Denny Triangle—mixed use area	DMC – 125'	7	125 ft.	+30% with TDC
		DMC – 160'	7	160 ft.	+30% with TDC
		DMC – 240'	7	240 ft.	+30% with TDC
5	Commercial core—western edge	DMC – 125'	7	125 ft.	None
		DMC – 160'	7	160 ft.	None
		DMC – 240'	7	240 ft.	None
	Belltown—southern edge	DMC – 240'	7	240 ft.	None

Notes: Optional height/density increases are opportunities in the Land Use Code for additional height if certain conditions are met. FAR = floor area ratio. TDC = Transfer of Development Credits. DOC = Downtown Office Core. DMC = Downtown Mixed Commercial.

**Table 6
Comparison of Alternatives**

Alternative 1-High End Height and Density Increases	Alternative 2 – Concentrated Office Core
• 135-foot height increase in DOC 1 and 100-foot increases in all Denny Triangle zones • 30% height increase in zones at edge of office and retail cores • 4 FAR maximum density increase in Denny Triangle DOC 2 zone and 3 FAR maximum density increase in other zones • 1 FAR increase in base FAR in DOC 1 zone and DOC 2 zones outside Denny Triangle; 2 FAR increase in base FAR in DMC zones and DOC 2 zone in Denny Triangle. • No TDC in Denny Triangle zones	• 100 and 135-foot height increases to the DOC 1 and DOC 2 zones • 30% height increase only at southern edge of office core • 3 FAR maximum density increases in DOC 1 and DOC 2 zones • No increase in base FAR • No height or density changes in western or northern DMC zones at periphery of the office/retail core • TDC limited to DMC zones in Denny Triangle
Alternative 3 – Residential Emphasis	Preferred Alternative
• 135-foot height increase in DOC 1 and 100-foot increase in Denny Triangle DOC 2 between 5th/6th and 8th Avenues, west to Blanchard St. • No other height increases • 3 FAR maximum density increase in DOC 1 and same DOC 2 area described above • No increases in base FAR • Rezone Denny Triangle mixed use area between Westlake, Howell and Minor Ave. from DMC to DMR/C, lowering density from 7 FAR to 5 and 4. This re-orientes the zoning to mixed residential development. • Rezone Belltown southern edge from DMC to DMR/C, lowering density from 7 FAR to 5. • In other Denny Triangle and Commercial Core DMC zones, require the development of non-residential density (above the base) to be contingent upon including on-site housing. • TDC remains in all Denny Triangle zones except portion of DOC 2 with height, density increases.	• <u>250-foot height increase above base height in DOC 1 and 300-foot increase in Denny Triangle and Belltown DOC 2 between 3rd and 9th Avenues, from Blanchard St. to Pine St.</u> • <u>3 FAR maximum density increase in DOC 1; 4 FAR increase in DOC 2 area described above. Remaining DOC 2 areas on southern edge of Commercial Core and Denny Triangle would be rezoned to DMC, but would retain current DOC 2 density limits of base 5 FAR and maximum 10 FAR. A ½ block DOC 2 area in Belltown west of 3rd Avenue would also be rezoned to DMC.</u> • <u>No increases in base FAR in DOC 1 and DOC 2 zones, and the current provision allowing special actions for floor area increases for the first FAR above the base FAR would be eliminated.</u> • <u>DMC areas in portions of the Denny Triangle and along the southern edge of the Commercial Core would have height limits of 340 feet for non-residential use and 400 feet for residential use, with a base FAR of 5 and maximum FAR of 10 for commercial uses. Remaining DMC areas would retain the current base 5 and maximum 7 FAR limits on commercial density. In most of these areas, height limits would be 240 feet for non-residential uses and 400 feet for residential use. However, the current 125-foot height limit would be retained for all uses along the eastern edge of the Pike Place Market, and west of Post Alley, the height limits would be 160 feet for non-residential uses and 240 feet for residential use.</u>

	• <u>An area of two half-blocks on the eastern edge of the retail core currently zoned DRC would be rezoned to DMC, increasing the permitted height and density for all uses.</u> • <u>The transfer of development credit (TDC) program would be eliminated in the Denny Triangle.</u> • <u>A new provision would allow sites in any DMC area committed to residential development to transfer unused commercial development rights to receiving sites in specified DMC areas.</u> • <u>Special bulk controls would be established for residential and mixed-use structures over 125 feet in height.</u> • <u>Residential structures built to the maximum allowed height and bulk would contribute to an affordable housing mitigation program.</u>
Alternative 4 – No Action • No changes in allowable height or density • Existing optional height increases would be available, through use of bulk limitations, use of TDC program, preservation of landmarks or small structures on-site, or provision of on-site open-space usable to public. • Optional height increases range from 10% to 30% above mapped height limits.	

Source: DPD, 2004

Recent Downtown Regulatory Changes Adopted in 2001

In 2001, the City Council approved several changes to Downtown land use regulations, including changes to the system of obtaining bonuses, using transfer of development rights (TDR), options for obtaining additional height, and adjustments to base densities in some zones. This section summarizes these changes, for the information of the reader.

Downtown regulations continue to govern density in most zones by establishing a base and maximum floor area ratio (FAR), varying among the Downtown zones. The 2001 amendments fundamentally changed the system for increasing floor area above the base FAR and related development standards, including height provisions. The following is a summary of the major amendments:

PROVISIONS FOR HEIGHT INCREASES

An increase in height of up to 10% above current mapped height limits is allowed for occupied floor area in the Downtown Office Core 1 (DOC 1) and Downtown Office Core 2 (DOC 2) zones as a replacement for the sculptured building top bonus. A reduction in floor size for the upper portion of the structure is required to achieve a less bulky appearance, and the height increase does not permit increases in density beyond established maximum FAR limits. The 10% additional height allowed for unoccupied rooftop features is permitted above the 10% height gain.

A height increase of up to 20% in the DOC 1 zone and a limited portion of the DOC 2 zone is also now allowed to further promote less bulky development and to achieve enhanced conditions at the street level of tall structures. In addition to the reduction in floor size for the upper portion of the tower, special

conditions are required at the street level, including the provision of open space, low-scale structures and/or preservation of a landmark structure on the development site.

CHANGES TO DENSITY LIMITS

Maximum FAR Limits. There were no increases to maximum FAR limits. In the DRC zone, the maximum FAR was reduced from 6 FAR to 5 FAR.

Base FAR Limits. Permitted base FARs were increased in the DOC 1 and DOC 2 zones by 1 FAR, and by 0.5 FAR in the DRC zone. These changes re-establish a graduated range of base FARs reflecting a land use pattern that focuses greatest density on the Downtown office core in the DOC 1 zone, with the next greatest density permitted in the DOC 2 zone. Increases in the base FAR also offset the elimination of floor area bonuses previously allowed for required features, such as sidewalk widening. In the DOC 1 and DOC 2 zones, the first FAR above the base FAR can still be gained by providing a variety of on-site amenities, such as street-level retail shopping uses, short-term parking, and public open space features.

CHANGE TO BONUS/TDR PROVISIONS

The original incentive provisions allowed incremental increases in floor area above the base FAR through the use of certain types of bonuses or by acquiring development rights from eligible properties that could be transferred to the development site (TDR). Under this system, use of housing bonuses and TDR from affordable housing structures was reserved for the uppermost increments needed to reach the maximum FAR.

Under the new provisions, the maximum FAR can be achieved in several ways, including:

- Transfer of development rights (TDR);
- Floor area bonuses when certain impacts of development are mitigated by voluntary agreements to provide or contribute to housing and child care (“facilities bonus”); or
- Floor area bonuses when certain impact-mitigating features are provided (“amenity bonuses”).

The bonus and TDR options have been re-prioritized under the amended provisions to focus on mitigation of housing impacts. In DOC-1 and DOC-2, seventy-five percent (75%) of any floor area above 1 FAR above the base FAR must be earned by TDR transferred from qualified housing sites or by facilities bonuses that involve mitigation of housing and child care impacts. Twenty-five percent of the floor area above 1 FAR above the base FAR must be earned from other (non-housing) development rights transfers or amenity bonuses, or both. Five percent (one-fifth of the 25%) must be achieved through TDR from Landmark structures when available. In DRC, the 75%-25% split would be applied to all chargeable floor area above the base FAR.

Some bonus features, including major performing arts theaters, sculptured building tops, and major retail stores, have been eliminated.

The first FAR above the base in DOC 1 and DOC 2 zones can be gained through by using amenity bonuses, including short-term parking and retail uses, or non-housing TDR. In DMC zones, floor area increases above the base FAR can be gained by using one of two options: a) the rules governing floor area in general and for gaining bonus floor area that applied prior to the amended provisions, or b) the newer bonus and exemption rules described above.

CHANGES TO TRANSFER OF DEVELOPMENT RIGHTS (TDR) OPTIONS

The use of TDR continues to allow the unused base density permitted on a site to be transferred to other sites within the same block or transferred between blocks from eligible sites in some areas of Downtown to other areas. Transfers continue to be permitted from sites developed with landmark structures and

from sites with housing for households with incomes up to 80% of median income, provided a minimum amount of housing for households with incomes up to 50% of median income is included. The area where landmarks are eligible as TDR sending sites was expanded to include zones north of Virginia Street to Denny Way. Transfers are no longer permitted from Pioneer Square infill sites, from sites occupied by new housing or from new or existing performing arts facilities (except landmarks).

A new provision allows for the transfer of development rights from sites provided as Downtown public open spaces, subject to special conditions. All transfers are subject to limitations, some of them new (for example, in many areas a lower FAR is used to calculate floor area available to transfer from sending sites).

CHANGES TO RETAIL CORE PROVISIONS

The use of specific bonus features and conditional use approval is no longer required for structures to exceed the 85-foot base height up to the maximum height of 150 feet. Certain types of mixed-use development that include residential use or a minimum amount of retail and/or entertainment uses are permitted up to the maximum height of 150 feet without additional conditions. In addition, up to 30% more height is permitted on two half-blocks along the western edge of the retail core on the east side of 2nd Avenue between Pine and Union Streets.

Chapter Three

Key Issues and Findings

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KEY ISSUES AND FINDINGS

Introduction

The overall purpose of this Environmental Impact Statement is to provide information that will assist decisionmakers in making choices about possible changes in Downtown zoning. Given the complexities involved in zoning regulations and planning Downtown's long-term future, understanding the full spectrum of issues is a challenge. It is necessary to focus on "big picture" policy perspectives as well as the relationship to detailed aspects of the Land Use Code and zoning. This chapter summarizes the most important findings of the Draft EIS and places them in the context of the City's long-term Downtown planning efforts.

OVERVIEW OF KEY ISSUES AND FINDINGS

The key findings of this EIS speak to the multidimensional effects of making choices in Downtown zoning controls. Different choices may alter the "shape" of Downtown in terms of its buildings' physical dimensions, mixes of land uses, streetscape quality, real estate market, the presence of open space amenities, and the preservation of historic resources. How it functions will depend upon the adequacy of the available infrastructure.

Growth Policy and Downtown Planning Issues

The alternatives studied in this EIS would alter the height and density parameters for future growth in certain Downtown zones. The EIS analysis identifies a range of potential impacts relevant to: the City's growth policies and regulatory programs; the mix of commercial and residential uses that will occur with future growth; and the physical qualities of building height, bulk and scale. The ultimate choices may confirm the City's current growth policies expressed in its Comprehensive Plan and zoning, or alternatively, may adjust the City's policies to recognize changes in preferred growth priorities.

Relationship to growth policies and regulatory programs

Downtown Seattle is the pre-eminent urban center in the region, a dense employment and residential center that will continue to support a diverse mix of office, retail, service, governmental, cultural and entertainment uses. The City's Comprehensive Plan defines a central role for Downtown in accommodating employment and residential growth that helps fulfill the City's growth management responsibilities. Neighborhood planning for the various Downtown neighborhoods provides further policy guidance about the shape of growth Downtown.

The City's Downtown growth policies define a commercial office and retail core at the heart of Downtown, with office expansion areas extending north into the Denny Triangle area and south toward Pioneer Square and the International District. The map on page NP-58 of the Comprehensive Plan illustrates this concept. The largest residential concentration area defined by the growth policies is Belltown, and much of the rest of Downtown is intended for mixed commercial and residential development, as reflected by Downtown Mixed Commercial (DMC) zoning. The heights and densities of the DMC zone currently provide intermediate levels of height and density that act as a transition from the densest portion of Downtown to the adjacent neighborhoods.

The alternatives studied in the Draft EIS emphasize different aspects of the City's Downtown growth policies, with Alternative 1 posing the greatest challenge to those policies. The extent of changes

proposed in Alternative 1 would essentially represent further expansion of the office core area into areas currently intended to be transition areas with mixed residential and commercial uses. Alternative 2 is more compatible with the City's current growth policies because it avoids changing the DMC zones, while still adding height and density to the office core zones. Alternative 3 would provide a more residentially-oriented option by adjusting zoning in the DMC zones to more greatly emphasize inclusion of housing as part of mixed-use development and by reclassifying some DMC areas in the northern Denny Triangle and southern edge of Belltown to a more residential zone designation.

As a response to the findings of the Draft EIS and subsequent public input, the Mayor's Office has developed a Preferred Alternative (refer to Chapter 1). This alternative would retain most of the office core, office expansion and mixed-use transition zones described in current comprehensive and neighborhood planning. However, it would more tightly define the office expansion area by establishing a new DMC zone that would apply to some DMC areas in the Denny Triangle, as well as office expansion areas currently zoned DOC 2 near Interstate 5 and along the southern edge of the Commercial Core adjacent to Pioneer Square and Chinatown/International District. At the same time, many of the existing DMC-zoned areas in Belltown, the Commercial Core and the Denny Triangle would continue to have a mixed residential and commercial use emphasis to support further residential and mixed-use development. The Preferred Alternative would essentially combine the most beneficial elements of Alternatives 1, 2 and 3 while retaining the existing purposes and hierarchy of the zoning system.

The EIS alternatives would impact the existing Transfer of Development Credits (TDC) program in different ways. The TDC program accommodates additional density of residential development through increased height in the Denny Triangle in exchange for obtaining development rights from rural areas in King County and contributing to neighborhood amenities. It also is expected to result in King County funding for public amenities in the Denny Triangle. Alternative 1 would have the greatest effect on the TDC program, and Alternatives 2 and 3 would also constrict this program compared to existing conditions. Depending upon zoning choices, the TDC program could continue to be a factor in the City's Downtown regulations or could be superseded. Similar to Alternative 1, the proposed changes in the Preferred Alternative would supersede the Transfer of Development Credit program.

Relationship to mix of commercial and residential uses

Increases in the height and density limits of DMC zoned properties and some DOC 2 zoned properties could alter assumptions about property values and attractiveness for development. This could influence how properties are developed or speculatively held for future development. Future development might seek to maximize development potential by providing commercial and residential mixes of uses on sites. Alternatively, depending upon zoning, some properties might become more valuable and attractive only for commercial uses. Dynamics of real estate values could encourage speculative holding of property, squeeze out residential uses and discourage the economic viability of residential development. These dynamics could alter the future character of development, especially in Denny Triangle, and preclude achieving Comprehensive Plan and neighborhood plan objectives, unless the zoning and land use regulations are consciously defined.

The Preferred Alternative proposes zones with height and density limits that will clarify the intended scale and pattern of future development. Increases to commercial density limits are confined to a smaller area than under Alternative 1 to promote a stronger concentration of employment density in areas best served by transit, and in DMC areas, the maximum height limits are reserved for residential use to help promote housing where it is most desired as part of the overall mix of uses. Using zoning to better direct the type and densities of development desired in different areas should help avoid "overzoning" that can lead to speculative holding of property in underdeveloped uses such as parking lots.

Relationship to height, bulk and scale of future development

Possible code changes would alter the size and shape of future development through height and bulk regulations. The relationship between permissible height and density in a zone helps influence the shape and design of buildings. If the maximum height is too low, buildings seeking to maximize floor area may be designed in bulky squat forms rather than slimmer towers that better distribute building bulk. Conceptually, providing higher height limits would allow the same amount of building floor area to be more flexibly designed in a greater variety of forms. Therefore, the relationship between the permissible height and density should be carefully considered so that building designs are not artificially constrained within a building envelope that is too small.

The Draft EIS found that some of the proposed density increases would be proportionately even greater than the proposed height increases. For at least portions of Alternatives 1 and 2, this suggests that overly bulky buildings would continue to be an issue. Further, because residential use is currently exempt from density limits, residential structures could be designed in a quite bulky and dense form. Therefore, unless refined strategies are employed, the possible code changes could result in taller yet similarly bulky buildings as under the existing regulations (see Draft EIS pages 3-74 to 3-101 and 1-4 to 1-9 for further discussion of related issues).

The Preferred Alternative includes recommendations that would address height, bulk and scale concerns with refined strategies. For commercial development, the proposed increases in height limits, which in several areas exceed those in the Draft EIS alternatives, will allow structures with smaller, less bulky floor sizes to accommodate the additional density proposed. Modified upper-level development standards will also continue to ensure relief in the massing of structures to make them appear less bulky from the street level. For high-rise residential structures, maximum floor size limits and maximum wall dimensions will provide more predictability regarding the allowed bulk of residential towers, and will result in structures that are taller but relatively more slender than what is currently allowed.

Housing, Open Space and Historic Preservation Issues

The EIS identifies preservation and enhancement of housing, open space and historic resources as important aspects of City policy that should be considered in decisionmaking of zoning proposals. These are valuable resources and amenities that help shape the attractiveness, character and livability of Downtown. The presence of significant amounts of housing Downtown can also benefit transportation conditions, as more people could live close enough to walk, cycle or use transit to commute, helping to manage the impacts of vehicle commute trips.

Housing Resources

Housing resources for households at all income levels are important to the future of Downtown, including perpetuation of existing affordable housing resources and development of new housing resources. As discussed above, the mix of residential and commercial uses encouraged by zoning in portions of the Denny Triangle, Belltown and the Commercial Core is an issue pertinent to housing resources Downtown. A positive impact of the alternatives (including the Preferred Alternative) is the projected increase in housing bonus program funds for affordable housing that, if leveraged, could provide for more housing units developed Downtown than under the existing zoning. These funds, when leveraged with other resources, could contribute to the production of between 3,600 units under existing conditions to over 8,000 units, depending upon the alternative. Under all of the alternatives, including the Preferred Alternative, up to six residential buildings (three of which receive subsidies) totaling 300 residential units are located on sites that could be redeveloped by 2020.

The EIS also takes into consideration the nature of the residential environments likely to emerge under various zoning scenarios, recognizing that Downtown policies are not only targeted at increasing housing resources, but also at creating viable residential neighborhoods. Factors that influence Downtown's livability include type of development, character of the street environment, presence of amenities desired by residents, and concentrations of housing sufficient to support needed services and a residential character.

The Preferred Alternative encourages greater concentrations of housing in most DMC areas, through height incentives for residential use and other measures such as provisions for the transfer of commercial development rights from housing sites. The proposed bulk controls on high-rise residential structures will promote development that is more compatible with high-density, mixed-use neighborhoods, with a greater variety in development scale and a generally stronger sense of openness in the street environment than would be expected with development under existing conditions. The potential for increased use of landmark TDR, open space TDR and low-income housing TDR by commercial developments in DMC areas could result in more amenities complementing residential use in the area and enhancing the overall quality of neighborhood character. Provisions allowing common recreation area requirements for residential projects to be made off-site provide an opportunity to generate more funding for public open space in mixed-use neighborhoods. The screening of parking in residential structures, including separation from the street by other uses along the ground floor and portions of upper floors, should also contribute to more positive streetscape conditions.

Park and Open Space Resources

Growth in Downtown's residential and office populations will generate additional demand for park and open space amenities, for which there is a shortfall in supply relative to Comprehensive Plan goals for Downtown open space. "Open space" or recreation spaces can encompass several types of features, including parks, public plazas, indoor atriums, rooftop gardens, private and shared residential recreation spaces, and sidewalk "Green Street" spaces improved with landscaping and aesthetic and pedestrian-oriented features. Future development would provide some of these features over time per code requirements, but these may not be enough to satisfy all park and open space needs of Downtown residents and employees. Several commenters noted the importance of dealing with the open space impacts of future growth, recommending that effective mitigation be required. Potential mitigation strategies include making additional public investments in open space, exploring mechanisms to pool resources for open space improvements (such as payment of in-lieu funds), adjusting open space requirements to allow for innovative solutions (to residential and/or commercial demands), and other regulatory or incentive-oriented strategies.

Under the Preferred Alternative, increasing the maximum commercial density (FAR) limits while retaining the current base FAR in DOC 1, DOC 2 and the newly created DMC areas increases potential use of bonus floor area in these locations for open space amenities and open space TDR beyond what would likely occur under other alternatives. Limiting options for floor area increases in many DMC zones to various types of TDR could encourage greater use of open space TDR for open space improvements. Allowing developers to meet common recreation requirements for residential projects at off-site public open space locations or through green street improvements could contribute to the future supply of Downtown open space.

Historic Resources

City policy supports preservation of important historic resources typically consisting of Downtown buildings with architectural and/or historic value. Historic preservation was cited as an important issue in comments on the EIS by the Seattle Planning Commission, State Office of Archaeology and Historic

Preservation, the State Department of Community, Trade and Economic Development, and the Historic Seattle preservation group. Already-designated landmarks are afforded protection by the current regulations governing preservation of historic resources, and zoning incentives such as the transfer of development rights, providing opportunities to direct resources to these structures to ensure their preservation.

The Draft EIS also identified several buildings that are not yet designated but might qualify for landmark status. Historic Seattle and a couple of other sources also submitted the names of several other such buildings that were not identified in the Draft EIS. Of those, approximately 12 are located in the study area, including the Centennial Building, Chamber of Commerce, Diller Hotel/Porter-Davis, Fifth Avenue Court, Foster and Marshall Building, IBM Building, Maritime Building, Norton Building, Rainier Tower, Second and Pike Building, Securities Building, and the YWCA. Possible mitigation strategies identified in the Draft EIS include (but are not limited to) additional funding for acquisition of development rights from landmarks most at risk for redevelopment, as well as additional designation of landmarks by the City.

Under the Preferred Alternative, increasing the maximum commercial density (FAR) limits while retaining the current base FAR in DOC 1, DOC 2 and the newly created DMC areas increases potential use of bonus floor area in these locations for landmark TDR beyond what would likely occur under other alternatives. Limiting options for floor area increases in many DMC zones to various types of TDR could encourage greater use of landmark TDR than might otherwise occur. **Some special provisions that could be considered would provide greater incentives for landmark preservation, including the amended Planned Community Development process (or modified combined lot provisions) which identify landmark preservation as a public benefit enabling a project to seek added development flexibility through these mechanisms.**

Transportation and Energy Impact Issues

The EIS identifies transportation and energy as important environmental elements affected by the zoning proposals.

Transportation

Even with projected increases in transit ridership using bus, monorail, light rail and Sounder service, denser growth would contribute to increased congestion in portions of Downtown, most notably in the Denny Triangle. Traffic on commuting corridors to/from the north, east and south would experience greater delay, including delay in bus travel. Several intersections along the key commuting corridors of Stewart Street, Olive Way, Howell Street and Denny Way are likely to experience significant congestion during evening commute peak hours by 2020. Providing for continued capability to develop housing Downtown is one way to help limit the effects of congestion. More aggressive implementation of demand reduction programs, transit improvements, easing of parking requirements, and strategic physical improvements to the street system would also aid in reducing these impacts. City staff have also recommended examining the possibility of public-private partnerships that would leverage developer contributions to fund additional hours of transit service. Decisionmakers' choices will determine which package of mitigation strategies will be selected. By targeting proposed commercial density increases to those areas best served by transit and expected to receive further investment in transit infrastructure, the Preferred Alternative further concentrates employment at locations where commuters will be most likely to use transit.

Energy Infrastructure

This Final EIS, based on updated input from City Light, now identifies a need for an additional electrical substation to serve Downtown growth beyond 2020. However, a portion of the Denny Triangle could experience electrical capacity limitations sooner than that if commercial energy load grows more quickly than expected. These findings point to the need for strategic actions to ensure that future development can be served sufficiently. Actions could include additional capital investments, adoption of incentives or requirements for more sustainable choices in energy system design, and further implementation of City Light capacity planning recommendations.

The Preferred Alternative would have the effect of moderating impacts on energy infrastructure in critical areas like the northeast portion of the Denny Triangle by encouraging a mix of uses with more housing, which would generate less-intensive energy demands than commercial-only buildings.

Public Comment Themes

Public comments on the Draft EIS reflect a healthy diversity of opinions. Several of the comments indicate a willingness to consider regulatory changes that would lead to better forms of future development, with a sense that decisions need to be made in a balanced and careful manner. Many also favor stewardship of resources such as Downtown open space, housing and pedestrian-oriented streetscapes. Some commenters questioned the need for zoning changes, expressing concerns about aesthetic impacts as well as building bulk, streetscape quality and open space impacts. Some commenters also wondered how the EIS's Downtown growth scenario fit in with regional growth expectations and whether there are implications related to shifts in growth.

Many of the stakeholders representing the development community and Downtown business community expressed concerns that some Alternatives (particularly Alternative 3) would be too constrictive, with negative implications for development prospects. Several requested that even larger changes than Alternative 1 be considered, so that the Downtown zoning regulations do not hinder development in the next wave of economic growth. For many of these stakeholders, the desired strategies are believed to be mandated by neighborhood plans, and should be implemented so that subsequent development maximizes the fund-generating benefits accrued to housing resources, so there would be "wins across the board." This approach leans toward letting the market decide the uses and form of development that occurs in Downtown.

GROWTH RELATIONSHIPS BETWEEN DOWNTOWN, NEIGHBORHOODS AND THE REGION

In comments on the Draft EIS, a number of commenters expressed interest in how Downtown Seattle's growth (or lack of growth) under the alternatives might affect growth regionally and within Seattle. These comments arose from a range of perspectives both for and against change.

Pro-change and neutral perspectives in public comments

Several of the growth-related comments favor significant increases in the height and density limits of Downtown zoning. Some theorize that new development can choose to locate either in Downtown or other portions of Seattle or the region. Unless Seattle loosens its Downtown regulations, they believe that developers may more often choose to develop in other regional cities or parts of Seattle where the regulatory environment is more favorable. This outlook assumes that some of the Draft EIS alternatives might be "downzones" or contain disincentives to development.

Other comments more neutrally inquired about the potential impacts of diverting growth away from Downtown to other neighborhoods. They asked: "What happens if growth does not occur Downtown?"

Evaluation

Evaluating the potential for growth diversions into other areas is beyond the scope of this EIS. It is not reasonably possible to infer how different Downtown zoning choices might influence different patterns of growth in other parts of the city or region. This type of analysis would need to interpret extensive amounts of regional growth data and broadly infer how future growth might redistribute itself and what effects that might have. This would require too much speculation about how or if development might instead locate in the greatly different environments of Seattle neighborhoods or various suburban cities. Even supposing that such studies are possible, numerous "push" and "pull" factors would be involved as well as a multitude of uncertainties.

The EIS does not support conclusions of growth shifts away from Downtown Seattle based on differences among alternatives. The real estate consultant's analysis did not believe such shifts to be a plausible outcome. Historical trends in Downtown growth, including the perspectives provided by reviewing real estate and economic trends and Puget Sound Regional Council projections, support the growth range studied in the EIS. Inferring significant diversion of growth from Downtown based on particulars of certain zoning alternatives is not a supportable finding of the EIS, even as a hypothetical exercise. In fact, considering that the alternatives would all increase allowable height and density compared to existing zoning, these alternatives should increase the attractiveness of Downtown for development rather than decrease it.

Furthermore, even under existing conditions, Downtown can accommodate significantly more growth than is projected over the next 20 years—and beyond. The more pressing issue presented by the choices in this EIS is: where within Downtown can projected growth be best accommodated, and what type of growth is most desirable in different locations to be consistent with the City's growth plans and policies?

Skeptical perspectives in public comments

Among the skeptical perspectives expressed in comments on the Draft EIS were the following:

- Downtown might absorb more than its share of regional growth which might slow the prospective benefits of growth that might be achieved in other urban centers such as Lynnwood or Federal Way.
- Alternatively, the South Lake Union neighborhood might grow so much that demand for Downtown growth would thus be reduced, bringing into question the need for zoning changes.
- We should consider the secondary impacts of future Downtown growth, such as increased traffic congestion and housing costs, on other Seattle neighborhoods.

Evaluation

The EIS does not identify shifts in growth that might cause Downtown to absorb "too much" growth. Studies for the EIS concluded that increasing zoning capacity would not likely increase the amount of growth that might occur in Downtown over 20 years. Further speculation about differences in growth rates in other neighborhoods or cities is beyond the scope of this EIS. Rather than characterize whether growth in some areas would be "too much" or "not enough", the suggested perspective is to consider that growth is a long-term and ongoing phenomenon. Regardless of possible zoning changes in Downtown Seattle, growth will likely continue to happen in the city and region. Even so, it may take decades for many neighborhoods (including Downtown and South Lake Union) and suburban cities to reach their full growth potential. The suggested approach is to examine the long-term needs of Downtown Seattle and

ensure that sufficient commercial and residential development capacity is available and that development consistent with Seattle's policies for Downtown can be reasonably achieved. This would ensure that Downtown can continue to fulfill its role as the central, largest urban center in the region.

Further analyses of secondary impacts of long-term Downtown growth on other neighborhoods are beyond the scope of this EIS. The EIS was oriented to analyze what difference the zoning changes might make in development patterns and the identifiable differences that might result in Downtown. This is a suitable approach for a programmatic environmental review on a non-project proposal. Given this, it is not within the EIS scope to evaluate the cumulative impacts of 20 years of growth on Seattle neighborhoods. This task would be better addressed in analyses for the City's Comprehensive Plan.

Those with concerns about citywide housing and traffic impacts should consider that potential Downtown zoning changes are oriented to accommodating additional housing development in areas where residents will be better able to live without automobiles. This type of Downtown housing growth is conceptually more efficient in terms of housing, transportation and environmental impacts than growth in areas away from the Downtown Urban Center. Data from the 2000 Census indicate that a significant proportion of Downtown residents commute on foot or by transportation modes other than automobiles.

Chapter Four

Summary

CHAPTER FOUR

SUMMARY

Introduction

Chapter Four is a summary of EIS findings and recommended mitigation strategies, revised for this Final EIS. The chapter briefly describes background, features of the ~~four-five~~ alternatives (including a Preferred Alternative, three other Alternatives and a No Action Alternative), anticipated impacts, major issues to be resolved and mitigation strategies. ~~At this stage, a preferred alternative has not been identified.~~ A chart included in this chapter is a comparative overview of impacts identified for each alternative. For a more detailed discussion of the impact analysis, please see Chapters 2 and 3 of the Draft EIS and the accompanying technical appendices.¹

Background

The City engaged in an extensive neighborhood planning process following the adoption of Seattle's Comprehensive Plan in 1994. As part of this process, neighborhood plans were developed for five subareas of the Downtown Urban Center, as well as a plan for the Downtown Urban Center as a whole. Some of these plans included proposals for changes to height and density limits in some Downtown areas. As part of ongoing planning, the City has studied and made decisions on a number of individual proposals:

- With the City Council's initial approval of Downtown neighborhood plans in early 1999, proposals for rezones in the Commercial Core and Pioneer Square neighborhoods were implemented, along with limited amendments to bonus and TDR provisions.
- In collaboration with King County and the Denny Triangle, the Transfer of Development Credits (TDC) program was adopted in late 1999, which allowed for a 30% height increase for residential and mixed-use development in zones within the Denny Triangle to preserve rural lands and generate resources for public amenities in the neighborhood. An area of approximately four acres was also upzoned from DMC 240 to DOC 2 300' to increase employment capacity in the neighborhood.
- More recently, the City amended the provisions of the Downtown bonus and TDR programs through legislation adopted in mid-2001. Conditional height increases ranging from 10% to 30% were also adopted under this legislation for DOC 1, DOC 2 and portions of DRC zones. The bonus and TDR programs specify how projects can gain approval for greater density by providing for affordable housing, public open space, landmark preservation, human services and other public amenities.

This EIS studies another discrete set of actions that could be taken to implement changes recommended by Downtown neighborhood plans. It analyzes changes to height and density limits in three Downtown zones (see Study Area Map, Figure 12). The alternatives represent a range of possible actions that would increase zoning capacity within these areas to accommodate additional employment and residential growth. Alternative 1 represents the "high end" of possible changes (except in comparison to the newly defined Preferred Alternative), while Alternatives 2 and 3 emphasize changes supporting the commercial core and residential uses, respectively. An additional "Preferred Alternative" has ~~not~~ been identified, as discussed in Chapter 1 of this Final EIS. It is likely that City decisionmakers will combine actions from different alternatives as a result of public input and the findings of the EIS.

¹ This chapter includes new text in underline format and deleted text in strikethrough format, to indicate changes made since publication of the same chapter in the Draft EIS, where it was identified as Chapter 1, Summary.

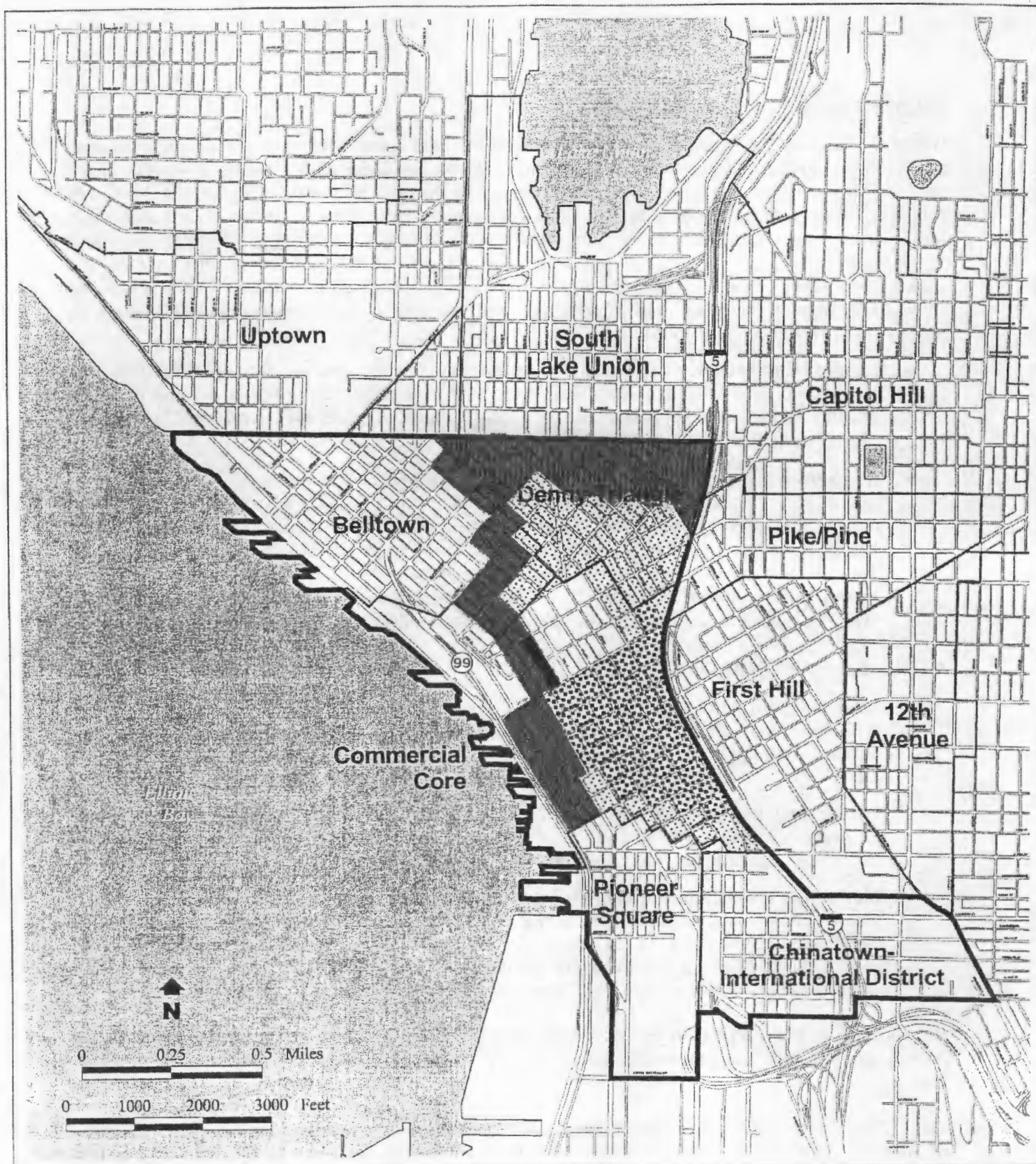
The purpose of this EIS is to disclose impacts associated with actions proposed under each alternative. This analysis makes it possible to compare outcomes of these different actions. It assists in identifying major issues that should be addressed in the course of developing a final proposal for implementation. Public review of this document and discussion of these issues will provide additional input about desired outcomes and the best approach for achieving them. This review will also help focus on key concerns that may require further attention, either with additional work for the Final Environmental Impact Statement or as part of developing mitigation strategies to accompany a final proposal.

Features of the Alternatives

SUMMARY OF THE ALTERNATIVES

- **Alternative 1.** Alternative 1 is a composite of proposals included in different Downtown neighborhood plans and recommendations by the advisory committee that participated in revising the Downtown bonus and TDR programs. Among the Draft EIS alternatives, this alternative calls for the greatest increases to both base and maximum density limits and height limits for all DOC 1, DOC 2 and DMC zones within the study area. Except for the Preferred Alternative, it also calls for the greatest increases in height, especially for zones within the Denny Triangle.
- **Alternative 2.** This alternative limits height and density increases to the DOC 1 and DOC 2 zones and maintains existing limits in the DMC zones within the study area. There would be no changes to base density limits, and use of housing bonuses or housing TDR would be required to gain a 75% portion of all floor area above base density (FAR) limits.
- **Alternative 3.** Alternative 3 would further limit height and density increases to DOC 1 and a portion of DOC 2. To increase capacity for housing, mixed-use provisions would apply to DMC zones, and some DMC areas would be rezoned to DMR/C, a more residential-oriented zone.
- **Alternative 4.** Alternative 4 is a No Action Alternative reflecting current zoning conditions, including the previously-adopted amendments that helped implement neighborhood plans.
- **Preferred Alternative.** The Preferred Alternative recommends changes that would increase height limits in DOC 1, DOC 2 and most DMC zones. The maximum heights proposed for DOC 1 and portions of DOC 2 would reach 700 and 600 feet respectively, and in most DMC areas heights for residential use would be increased to 400 feet, all of which are higher than those analyzed in Alternative 1.

Maximum density limits (FAR) would be increased in the DOC 1 zone, in most DOC 2 areas, and in some DMC areas in the Denny Triangle. The largest density increases in the DOC 1 and DOC 2 zones and the Denny Triangle DMC areas would be the same as discussed under Alternative 1. Portions of the DOC 2 zone in the Denny Triangle and along the southern edge of the Commercial Core would be converted to a DMC zone without changes to the maximum density limits. In other DMC zones, the current maximum density limits would be maintained. A single half-block currently zoned DOC 2 in Belltown (west side of Third Avenue between Virginia and Stewart Streets) is proposed for reclassification to DMC, which would lower the permitted commercial density but allow greater height for housing than is permitted under existing conditions. An area of two half-blocks along the western edge of the retail core not originally included in the Draft EIS study area is also recommended to be reclassified from the existing DRC designation to a DMC designation, which would increase both permitted commercial density limits and height for all uses.



DOWNTOWN EIS STUDY AREA

FIGURE 12

- Downtown Urban Center Boundary
- Urban Center/Urban Village Boundaries

EIS STUDY AREA:

- DOC1 Zone
- DOC2 Zone

- DMC Zone

- DRC Zone

Strategic Planning Office
City of Seattle
May 17, 2002

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ASSUMED AMOUNT OF GROWTH

Different proposals for height and density increases vary the capacity of commercial and residential growth that can ultimately be accommodated within Downtown under each alternative. However, the projected demand for housing and commercial floor area Downtown over the 20-year period between 2000 and 2020 is assumed to be constant, regardless of overall zoning capacity. Because developers build for perceived demand rather than building the maximum that zoning will allow, and all available sites will not be developed over a given time period, the zoning changes will not significantly alter Downtown's growth over twenty years. Therefore, for all alternatives, the assumption is that from 2000 to 2020, the Downtown Urban Center will add 70,000 jobs and housing to accommodate 17,500 households (equivalent to 18,400 dwelling units).

- **Employment growth.** The majority of the employment growth—90% (63,000 jobs)—is assumed to occur within the study area where height and density increases are being considered, with the remaining 10% (7,000 jobs) occurring in Pioneer Square, the International District, the retail core and Belltown.
- **Residential growth.** Of the 18,400 units added Downtown, approximately 7,350 units (40%) would be accommodated in development within the study area, with the remaining 11,050 units occurring in other areas, including Belltown, Pioneer Square and the International District. It is estimated that accommodating 11,050 units outside the study area would require utilizing about 87% of the remaining development capacity in these areas. Depending on the alternative, between 69% (Alternative 3) and 87% (Alternative 4) of the total available development capacity would be needed to accommodate the additional 7,350 units forecasted for the study area.

ASSUMED PATTERN OF GROWTH

- **Infill and growth outward from the core.** The analysis assumes future development will seek to infill remaining sites in the Downtown Office Core (DOC 1 and DOC 2) zones, and also grow outward from the office/retail core. Thus, redevelopable properties in or near the existing core are likely to be the most attractive for the next round of development within Downtown.
- **Larger sites and sites already assembled are more attractive.** The “grow from the core” assumption is tempered by an assumption that larger sites under single ownership will be as likely to develop as sites in better locations that are challenged by small site sizes or multiple owners.
- **Similarities among alternatives in the pattern of growth.** Under all of the alternatives, most of the growth projected for the 20-year period can be accommodated on the same sites, resulting in only limited distinctions between alternatives in the geographic distribution of growth. However, more distinctive growth patterns would likely emerge as additional growth occurs in later years, due primarily to changes in the DMC zones affecting available capacity for housing.

Relationship to Plans and Policies. All of the alternatives provide sufficient capacity to accommodate housing and job growth targets established for the Downtown Urban Center in Seattle's Comprehensive Plan.

The various Downtown Neighborhood Plans and the Downtown Urban Center Plan include a wide range of goals and policies about how Downtown should grow and the desired type of urban environment desired to accommodate growth. Of particular relevance to this EIS analysis are housing affordability goals and policies with regard to lower-income households. Other relevant goals and policies seek to maintain the positive characteristics of existing development conditions, promote high-quality livable residential environments, and maintain desired physical relationships between Downtown areas and adjacent neighborhoods. Impacts related to these goals and policies are discussed in more detail below.

Major Conclusions

Development over 20 years under existing zoning, as reflected in Alternative 4, will result in substantial changes to some Downtown areas, particularly the Denny Triangle. For some studied topics, the Alternatives 1, 2 and 3 would result in only subtle differences in impacts from the 20-year “baseline condition.” But for quite a few topics, future development under these alternatives would likely generate distinctly different levels of impacts. This section discusses several overall conclusions. Table 7 later in this chapter compares the impacts of the alternatives.

Population and Employment

- Depending on the source of the projection, Downtown Seattle is expected to grow by 16,000-26,000 new residents and 50,000-70,000 new employees. This level of population and employment growth can be accommodated through development permitted by the zoning under all alternatives, including the Preferred Alternative.

Housing

- All of the alternatives provide enough capacity for new residential units to meet demand between 2000 and 2020. However, after 2020 the limits to available capacity for residential development may begin to constrain growth. ~~will be limited~~
- The Denny Triangle Transfer of Development Credits (TDC) program would be eliminated under Alternative 1 and the Preferred Alternative. This program encourages residential development in the Denny Triangle, provides funds for amenities in the Denny Triangle and preserves land from development in rural King County. Its use would be restricted under Alternatives 2 and 3. ~~By retaining~~ If existing zoning was retained under Alternative 4 (No Action), the TDC program would continue to be available throughout the Denny Triangle. However, in the Preferred Alternative, proposed increases to height limits for residential use in DMC areas should offset some of the loss in residential capacity that could result from termination of the TDC program.
- Funding for low-income housing would increase under Alternatives 1, 2, ~~and 3,~~ and the Preferred Alternative above that projected with existing zoning. The Preferred Alternative and Alternative 2 followed by Alternative 3 would provide the most funds for low-income housing development. Increased funding for low-income housing in the Preferred Alternative is primarily attributed to increasing the maximum FARs in DOC 1 and DOC 2 and some DMC zones while maintaining the current base FAR.
- Six existing residential buildings containing 300 units are identified as sites where redevelopment could occur in the future. Three of the six buildings, with 141 dwelling units, receive subsidies to keep their units affordable to households earning less than 50% of the median area income. Under all alternatives, more subsidized units would be built through housing bonus funds than might be demolished.

Land Use

- There will be only modest ~~little~~ differences among the alternatives in the mix of land uses in the study area. Under all alternatives, the mix of uses in the Denny Triangle would significantly change with the redevelopment of many of the neighborhood’s vacant and underutilized blocks. Alternative 1 would result in fewer but larger office and residential buildings mixed in a high-density environment, whereas Alternative 4 (existing zoning) would likely result in more sites developed with slightly smaller buildings. Alternative 3 would provide the most difference from the other alternatives, with

the projected development of residential enclaves in Belltown and the Denny Triangle. The impacts of the Preferred Alternative would likely fall between those of Alternative 1 and Alternative 3.

- As redevelopment occurs, less expensive office space is likely to be lost, and those human service providers that do not own their own space may find it more difficult in the future to find affordable space in Downtown Seattle.
- ~~One City of Seattle landmark and~~ A number of buildings considered important to various Downtown neighborhoods were identified as sites where redevelopment might occur, due to the small size of their ~~structures landmark~~ compared to the potential maximum development permitted on the site. One City of Seattle Landmark (Old Norway Hall) is located on a site identified to be at a "secondary" level in terms of its likelihood to redevelop.

Height, Bulk and Scale

- Among the Draft EIS alternatives, Alternative 1 allows the greatest increases in height and density throughout the study area. With these increases, projected growth could be accommodated in fewer but larger projects than the other alternatives. Under Alternative 1, taller bulkier structures would be permitted in some sensitive transition areas, resulting in a more abrupt change in scale and intensity of development along edges where the study area abuts other neighborhoods. The Preferred Alternative allows greater height than the Draft EIS alternatives in DOC 1 and most DOC 2 areas, as well as many DMC areas. In the office core zones, the greater height is intended to accommodate the same maximum density limits proposed in Alternative 1, but in less bulky towers. In the DMC areas, the greatest height increases are limited to residential use, and are combined with more stringent controls on building bulk to ensure that taller buildings are less bulky than what could occur if only existing restrictions applied. In transition areas, the greatest increases in height are for residential use subject to additional bulk controls, and the commercial density limits would remain at existing levels. Consequently, buildings built to these heights in the future would appear less bulky, and the achievable density of development would continue to provide for the desired transition between the denser office core and less intensive adjacent neighborhoods.
- Under all the Draft EIS alternatives, the absence of a density limit on residential use, along with the lack of any restrictions on exemptions for above-grade residential parking from floor area limits, creates the potential for very bulky residential and mixed-use developments.
- The likely scale and character of residential development, and the general mixing of housing with high-density commercial projects under Alternatives 1 and 2 could hinder development of areas with a strong residential character. except in Under Alternative 3, where establishing additional residential zones are established in part of the Denny Triangle and the southern edge of Belltown could result in environments with a greater concentration of housing and a more residential character. While residential-oriented zones would not be established under the Preferred Alternative, proposed changes in the DMC zones, including height incentives for residential use and special provisions like the transfer of commercial development rights to create housing sites, and the rezoning of some DOC 2 areas to DMC may encourage development choices that result in greater concentrations of housing and a stronger residential character in some areas.
- In some zones where the bulky appearance of recent development is attributed to current height limits, the proposed density increases are proportionally greater than proposed height increases. Consequently, the outcome could be taller buildings with similar bulky characteristics rather than more slender, taller towers. The Preferred Alternative would largely avoid or reduce the likelihood of this type of impact by allowing sufficient height to comfortably accommodate permitted density in high-rise towers without requiring the large floor sizes that make structures appear bulky.

- The narrower street widths and longer block sizes in portions of the Denny Triangle could exacerbate impacts associated with bulkier development. The Preferred Alternative would somewhat reduce the potential for this type of bulk impact, due to improved controls on building bulk of residential structures.

Pedestrian Amenities and Streetscape

- Only minimal development standards for enhancing the pedestrian environment apply in the portion of the Denny Triangle west of Westlake Avenue. This could result in a low level of pedestrian amenity and limited street level activity in what is likely to emerge as a high-density office district.

Parks and Open Space

- Future development under any of the alternatives will increase Downtown employment and residential populations, creating more demand for the use of existing open space resources. Some of this demand will be met through open space provided as a result of zoning requirements and incentives, as well as common development practices. Development will provide required open space to meet the needs of building occupants, as well as public open space to help augment existing public resources.
- The greatest increase in employment and residential population is projected for the Denny Triangle, where open space resources are currently limited. Under any alternative, open spaces are unlikely to increase sufficiently to meet all of the open space goals in the Comprehensive Plan. Potential additions to open space resources through public action include acquisition of land in the Denny Triangle with funds allocated to the area for open space improvements through the Pro-Parks initiative, and the potential for a significant open space to be developed as part of King County's TOD redevelopment of the Convention Place station site. Opportunities for significant additional public open space along the waterfront in conjunction with the replacement of the Alaskan Way Viaduct are also being contemplated. Providing open space resources jointly with other public infrastructure and utility projects, such as power substations, may provide additional opportunities for increasing open space resources. Also, improved design of existing open space resources, such as Freeway Park and Denny Park, could enhance access and increase use for the growing Downtown population.
- Elimination of the Transfer of Development Credits program due to height increases (as is likely under Alternative 1 and the Preferred Alternative), or reduction of the TDC program's area, represents a potential loss of a funding source for desired open space improvements in the Denny Triangle. A commitment by King County to develop a major public open space as part of the Convention Place TOD project was also part of the Inter-local Agreement between the City and County establishing the program.

Views and Aesthetics

- Potential impacts on views were considered for public viewpoints, view-protected landmarks, scenic routes, the skyline and other non-protected views. In many cases, differences between the alternatives in visual impacts would be relatively subtle. However, Alternatives 2, 3 and 4 would promote differences in allowable building bulk that would be detectable when viewed from some locations. Under the Preferred Alternative, taller structures would be allowed at various locations than under any of the other alternatives, but individual new developments are more likely to be perceived as less bulky than under the other Alternatives.

Urban Climate (Shadows and Wind)

- Future development of taller buildings in the Denny Triangle, edge of Belltown and First Avenue/Western Avenue vicinities would add to the shading of city streets. The possibility of higher

building heights on a few properties near Denny Way creates slightly greater potential for shading impacts on Denny Park.

- Future development of new buildings in Downtown would create the potential for additional wind effects near street level, depending upon the design of specific buildings and the general grouping of buildings. If development under the Preferred Alternative uses the added height allowed to accommodate smaller floorplates and more varied massing schemes previously not possible under existing height constraints, portions of towers may be located further from street edges or there may be additional vertical interruptions in facades with reductions in the size of upper floors that could reduce “downwash” and other negative wind impacts at street level.

Transportation

- For all alternatives, traffic volumes in 2020 entering and leaving Downtown at the studied locations would increase by approximately 10% in the AM Peak hour and 20% in the PM peak hour compared to existing conditions. This reflects the relatively high level of growth over 20 years studied by this EIS.
- In the northeast corner of Downtown (Denny Triangle), Alternative 1 would generate traffic approaching the rated capacity of key commuting corridors near the Stewart Street and Denny Way intersection by the year 2020. For the other alternatives (including the Preferred Alternative), traffic volume/capacity conditions in this vicinity would be roughly 5-10% better than Alternative 1.
- Impacts of the alternatives in other portions of Downtown would not be as substantial as in the Denny Triangle.
- By 2020, even with no zoning changes, the number of intersections experiencing significant or severe congestion in the key studied corridors (e.g., Stewart, Howell, Olive Way, Denny Way) would increase from 5 intersections today to approximately 17 intersections in the PM peak hour. Alternatives 1, 2 and 3 would cause 2 to 5 additional intersections to experience this level of congestion (level of service E or F) in the PM peak hour. This would adversely affect travel times through the studied corridors for general traffic and buses, and cause some queuing (lane backup) issues in several locations. Impacts of the Preferred Alternative likely would be between those of Alternatives 1 and 3.
- Future development over time could contribute to displacement of several existing King County Metro bus layover locations, primarily in the Denny Triangle.

Parking

- With future development under any of the alternatives, at least 17,000 additional off-street parking spaces would be provided, and approximately 7,100-7,500 existing off-street parking spaces would be displaced, largely in the Denny Triangle and edge of Belltown vicinities. While the Preferred Alternative includes a proposal to eliminate the minimum parking requirement for commercial uses, most projects are expected to provide some amount of parking for building tenants within the maximum limits allowed.
- Future growth would increase overall parking demand, for approximately 19,500 to 23,750 spaces, depending upon how many commuters choose to use transit rather than automobiles. Depending upon the strength of demand, it is possible that developers or private parking providers would provide a greater supply of parking, although the maximum limits on the amount of long-term commuter parking in projects and restrictions on where principal-use parking facilities can be located would limit the amount of additional parking that could be provided in future development.
- Competition for on-street parking spaces would likely increase, especially in areas of concentrated future development.

Energy

- ~~The EIS growth assumptions are approximately consistent with levels of growth in City Light projections. Given updated analyses available in 2004, City Light predicts that a new substation serving Downtown needs to be energized by 2012 after 2020. Under Alternative 1, potential future development resulting from higher zoning height/density limits in the Denny Triangle area east of 8th Avenue could result in capacity limitations more quickly than would otherwise occur, due to increased commercial loads. These limitations and needed improvements will be closely monitored and addressed in City Light's Capacity Plan in 2005 (and as subsequently updated in the future). Alternatives 3 and 4 would generate comparatively lesser impacts on the electrical system than Alternatives 1 and 2. The impacts of the Preferred Alternative are likely to be similar to but somewhat less than Alternative 1 because with slightly more commercial development concentrated in the office core zones, there would likely be less potential for higher-density commercial development extending into the eastern edge of the Denny Triangle.~~

Water and Sewer/Stormwater Utilities

- The alternatives would generate additional water consumption and sanitary sewage volumes due to future development of commercial and residential uses. However, the capacity of existing systems in general would be adequate to provide for this future growth.
- Better stormwater control requirements with future development will likely improve overall stormwater flow conditions in the combined sewer facilities.

Major Issues to be Resolved

Some questions relating to the magnitude of impacts or the design of mitigation strategies are still unresolved. These issues, discussed in this Final EIS, will be addressed in ongoing review and planning.. Major issues ~~requiring further study and resolution~~ include the following:

Balance between employment and housing growth Downtown

The proposed changes studied in the EIS raise an important policy question about Downtown growth that needs to be addressed to guide the City's decisions. Should actions be taken to expand areas Downtown dedicated primarily for concentrated employment growth, with the potential risk of foreclosing opportunities for more housing development in these areas? Or should actions to increase Downtown's capacity for employment growth be balanced with actions to create additional capacity for residential growth?

Below are two potential policy choices related to the nature of Downtown growth:

- **Expand Downtown's role as employment center.** Changes to height and density limits in the study area will expand Downtown's ability to accommodate more jobs by increasing employment capacity. Higher commercial densities beyond the core will provide opportunities for more concentrated employment growth in areas currently intended for a mix of both housing and moderate-density employment activity. As more of the Downtown area absorbs employment growth, housing will be accommodated in peripheral areas, like Belltown, or in areas adjacent to Downtown where land is available.

As growth continues under the proposed changes, residential capacity will eventually be "built-out" while capacity remains for continued employment growth. Consequently, the amount of housing that can continue to be provided Downtown for Downtown employees will diminish. Housing for Downtown employees will increasingly need to be provided in areas outside of Downtown. With constraints on housing capacity in adjacent areas, including First Hill, Capitol Hill, South Lake Union,

and Uptown Queen Anne, opportunities for housing future Downtown employees in these areas will be limited as well.

- **Promote a balance between both employment and housing growth.** This approach implies there is an first requires defining the appropriate balance between the amount of jobs and housing to be accommodated Downtown over the long term, beyond the 2014 timeframe of the Comprehensive Plan growth targets. As noted in comments on the Draft EIS, the concept of "balance" is relative, not necessarily consisting of a 1-to-1 balance of housing and jobs. As the Comprehensive Plan is updated in 2004 to cover the timeframe between 2014 and 2024, housing and employment growth targets may be updated to cover those additional ten years. To the degree this concept is favored by decisionmakers, measures then need to be considered for ensuring sufficient capacity to maintain this balance—either by reserving more areas for housing, linking increased employment density to provisions for additional housing production, or some other means. The Preferred Alternative proposes certain actions to promote this balance within the study area; in a large portion of the DMC areas, the permitted density for commercial development is maintained at current limits, while incentives are added for housing, including increased height limits for residential and mixed-use development and provisions that allow the transfer of commercial development rights from sites that are developed with housing. Increased commercial densities in the DOC 1 and DOC 2 office core zones are also intended to attract a larger share of future commercial growth to these areas, thereby reducing pressure for commercial expansion into the adjacent mixed-use DMC areas.

Livability of Downtown residential environments

Assumptions about the type and location of housing to be built in the study area in the future imply that a certain type of residential environment will emerge, with larger, denser residential projects mixed with high-density commercial development. These assumptions raise questions about the type of residential environments desired to accommodate future housing, as well as the measures needed to achieve these environments. Included among these questions: how best to accommodate a desirable mix of housing serving households of various incomes, and how to provide necessary amenities and services needed to support different residential populations? With higher land costs in areas where commercial densities are increased, will subsidized affordable housing continue to be ~~built~~ buildable in these areas? If so, will there be sufficient support services available to this population?

Two options for future Downtown residential environments that are explored in the EIS include:

- General mixing of housing development with commercial development;
- Creation of residential areas or "enclaves" where housing is the predominant use.

Elimination or Continuation of the Transfer of Development Credit Program

The City established the TDC program in the Denny Triangle jointly with King County in 1999. Since then, one project has purchased a limited number of conservation credits and incorporated public amenities on the development site as a contribution to the amenity credit fund. While no projects have yet purchased development credits, at least a half dozen Several other projects have expressed interest, and the County has already committed limited resources to be used in the design and implementation of a demonstration Green Street block.

In varying degrees, the proposed alternatives reduce the area of the Denny Triangle where the TDC program would continue to operate. Alternative 1, with proposals for the greatest height and density increases in the Denny Triangle, would likely result in the elimination of the program altogether. Alternative 2 would keep the program active in roughly half of the area, while Alternative 3 would maintain the program in about 2/3 of the area. The Preferred Alternative would likely result in the elimination of the program.

The TDC program provides a means to target public and private resources into a high-growth area. It is also seen as a way to make residential development a more competitive option for developers in zones that allow relatively high densities for commercial development. Because residential use is not subject to a density limit under Downtown zoning, the one mechanism the TDC program employs to encourage provides the only mechanism for requiring market-rate residential development to contribute to public amenities is the ability to add in exchange for allowing additional residential floor area above current height limits. Proposals to allow greater height for development in the Denny Triangle will remove this incentive of added height that participation in the TDC program was able to provide.

Accommodating transition between high-density Downtown commercial areas and less intensive adjacent neighborhoods

Downtown zones were originally established and mapped to accommodate a ~~gradual~~ transition in the density, height and scale of development in areas between separating the "core" commercial zones and adjacent residential and mixed-use areas. Increases in height and density that would create a more abrupt change in the scale and intensity of development along the "edges" of these transition areas should be evaluated to ensure that they remain compatible with the general principles of transition discussed in City policies.

Under what circumstances should measures be applied to maintain a development transition? This is especially an issue for portions of DMC areas abutting Belltown, Capitol Hill, Pike/Pine, the Cascade neighborhood and the waterfront; as well as portions of the DOC 2 zone abutting the historic districts of Pioneer Square and the International District to the south, Pike/Pine to the east, and the residential enclave desired in the northeast corner of the Denny Triangle. The proposed changes in the Preferred Alternative are meant to alleviate potential impact concerns of height and bulk in future development, including their relationship to transition issues. While the Preferred Alternative includes proposals for height increases in most of these areas for residential use, for the most part, commercial height and density limits are maintained at existing levels. This would retain the transition in the intensity of development that these zones currently provide. Since there is no increase in commercial density limits, commercial buildings, where allowed increased height, would likely be less bulky, and residential structures would be subject to new bulk controls.

Accommodating additional open space

With only limited open space, the affected area currently has the greatest employment density in the region (over 300 jobs per acre), which is projected to increase further in 20 years to over 460 jobs per acre. Furthermore, projections call for adding a substantial amount of housing to the area—over 7,350 new units. With about 6,000 units currently in the affected area, the amount of housing will more than double, increasing density to about 32 units per acre. With only a limited increase in the amount of open space planned for the area, this additional growth is likely to raise concerns about being adequately served. Under the Preferred Alternative, increasing the maximum commercial density limits while maintaining current base density limits creates the potential for greater use of development incentives for providing public open space, such as bonus open space features like plazas, hillside terraces, and parcel parks located on projects sites, green street improvements, contributions through in-lieu of payments for off-site open space improvements, and use of open space TDR from future public open space sites, such as the Olympic Sculpture Park.

Promoting a desired development scale

Preliminary Studies for this EIS have identified several issues related to the bulk of development under any of the EIS alternatives, including:

- **Residential and mixed-use development.** Current conditions create the potential for very bulky residential and mixed-use development due to the fact that FAR density limits do not apply to residential uses and accessory parking provided in above-grade structures. In the absence of such limits, current bulk controls have only a limited impact on overall building bulk. With increased height limits, the issue of development bulk is likely to gain more attention as more residential and mixed-use developments occur in Downtown commercial zones, and projects increasingly push the building envelope to maximize development potential. The Preferred Alternative is meant to alleviate impact concerns by controlling residential building bulk better and adjusting the relationship between permissible bulk and permissible density. However, addressing this issue raises another dilemma. Measures to promote more desirable building forms (slender towers, tower spacing, etc.) will reduce the number of units that can be accommodated on a site—appearing to contradict efforts to promote more housing.
- **Commercial development.** Increasing density limits, even when coupled with height increases, could result in the unintended consequence of producing bulkier buildings. For example, the Alternative 1 proposal to raise density limits from 10 FAR to 14 FAR (40% increase) in DOC 2 areas of the Denny Triangle, while increasing height limits from 300 feet to 400 feet (33% increase), will create a similar situation to that of the DOC 1 zone, where problems have been cited with the bulkiness of development built to the current maximum 14 FAR and 450-foot height limit. Given the larger site sizes and lower height limit of the DOC 2 zone, this condition would likely be repeated by Alternative 1. Similarly, the proposed 10 FAR in DMC zones with height limits of 240 feet or less could raise the same issues cited in DOC 2 zones under the current 10 FAR limit and 300-foot height limit. The Preferred Alternative is meant to alleviate impact concerns by allowing for taller buildings that will be able to distribute bulk better in a tower form that is more likely to be slimmer than what would occur under the existing height limits. Consequently, the proposed height limits are proportionately greater than the proposed density limits.

Additional Impact Analysis on the Preferred Alternative

This section provides additional impact analysis that expands upon the Draft EIS's land use, height/bulk/scale and urban design impact analyses, in relation to the Preferred Alternative. Also, it further expands the impact analysis to address one newly proposed rezone within the Preferred Alternative that is distinct from the other alternatives.

Height/Bulk/Scale Impact Analysis for the Preferred Alternative

This chapter's various new discussions provide additional analysis of the height/bulk/scale implications of the Preferred Alternative, including underlined text throughout the chapter and the additional "Preferred Alternative" impact column in Table 7 below. These provide the necessary level of evaluation with the additional benefit of allowing comparisons among alternatives.

As an additional supplement to the analyses, this section includes graphics that depict the implications of the Preferred Alternative on building height, bulk and scale and its relationship to the cityscape. Figure 13 provides a depiction of the largest projects that might be anticipated under the Preferred Alternative, compared with existing development built under various Downtown Zoning Codes and potential development under the current code. For commercial development, the illustration shows a project on a full-block site accommodating the maximum density (FAR) allowed and extending to the maximum height limit. The residential project is shown built to the maximum bulk and height limits allowed in the various zones. For commercial development, the largest projects, while taller than existing zoning allows, would not be as tall as many existing Downtown office towers, and would be more slender when compared to other towers built to maximum density limits. Few residential buildings have been built in

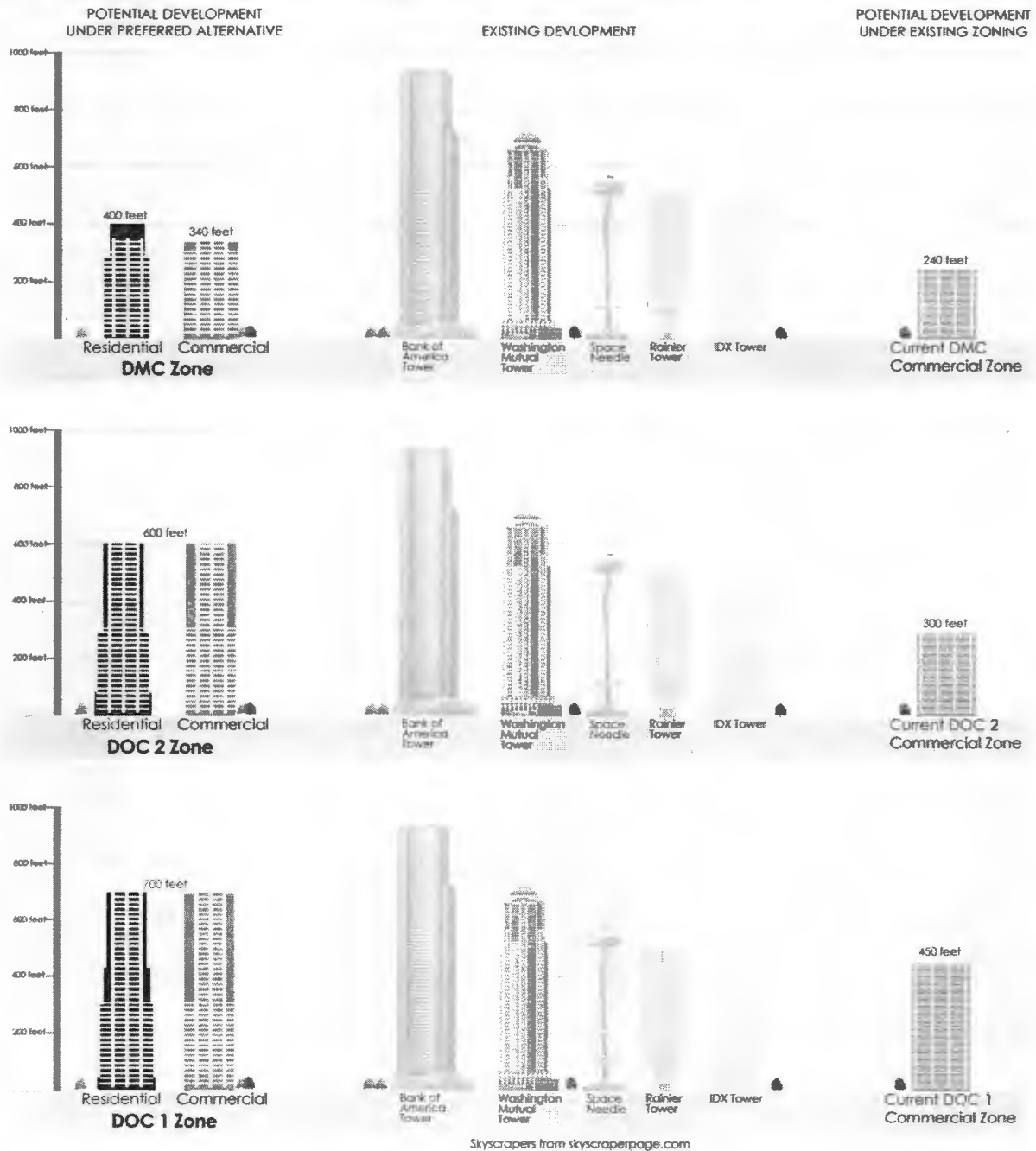


FIGURE 14.
**Comparison of Proposed and
Existing Building Heights**

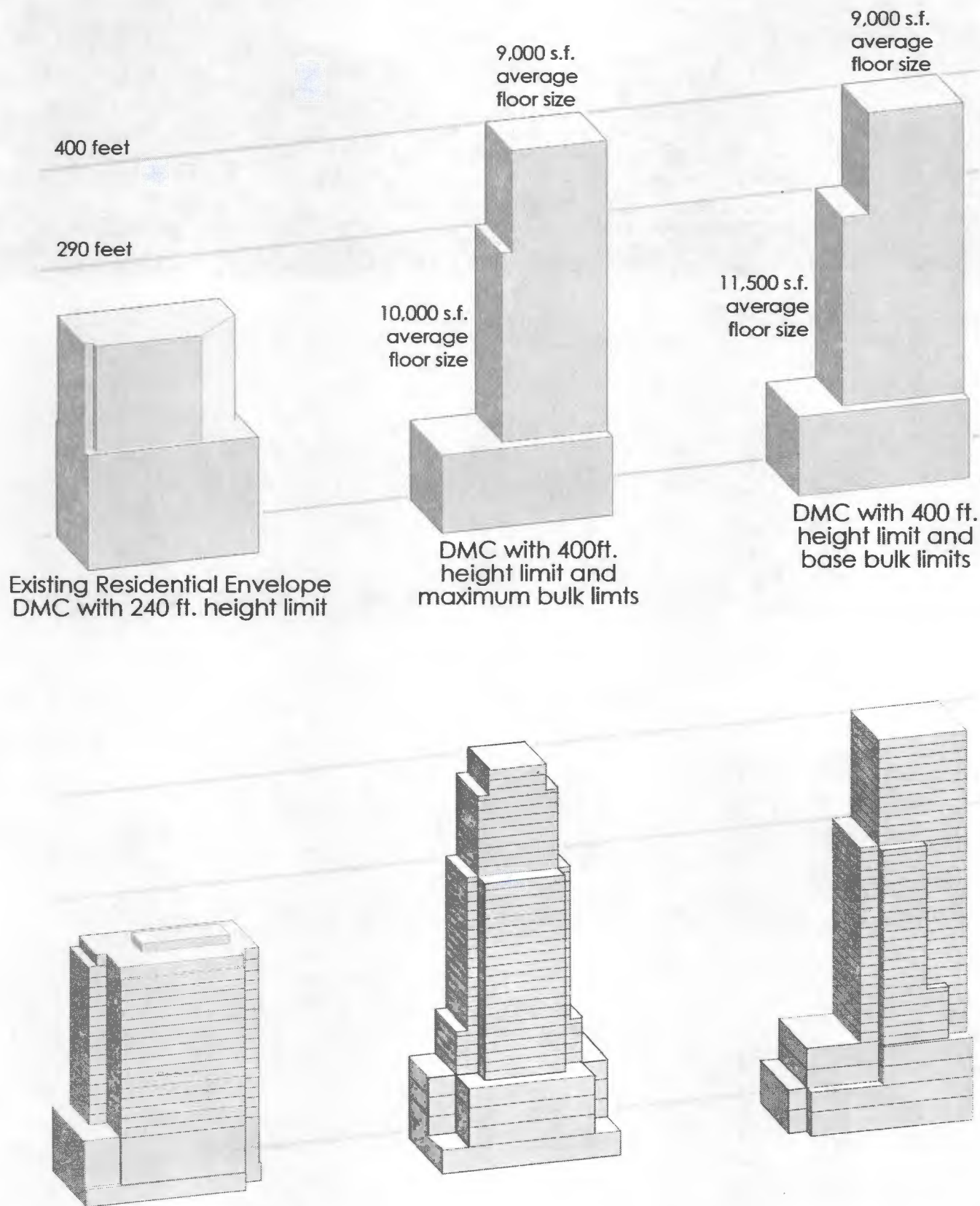


FIGURE 14.

**Illustration of zoning envelopes
and possible building forms,
DMC 240/400 zone.**

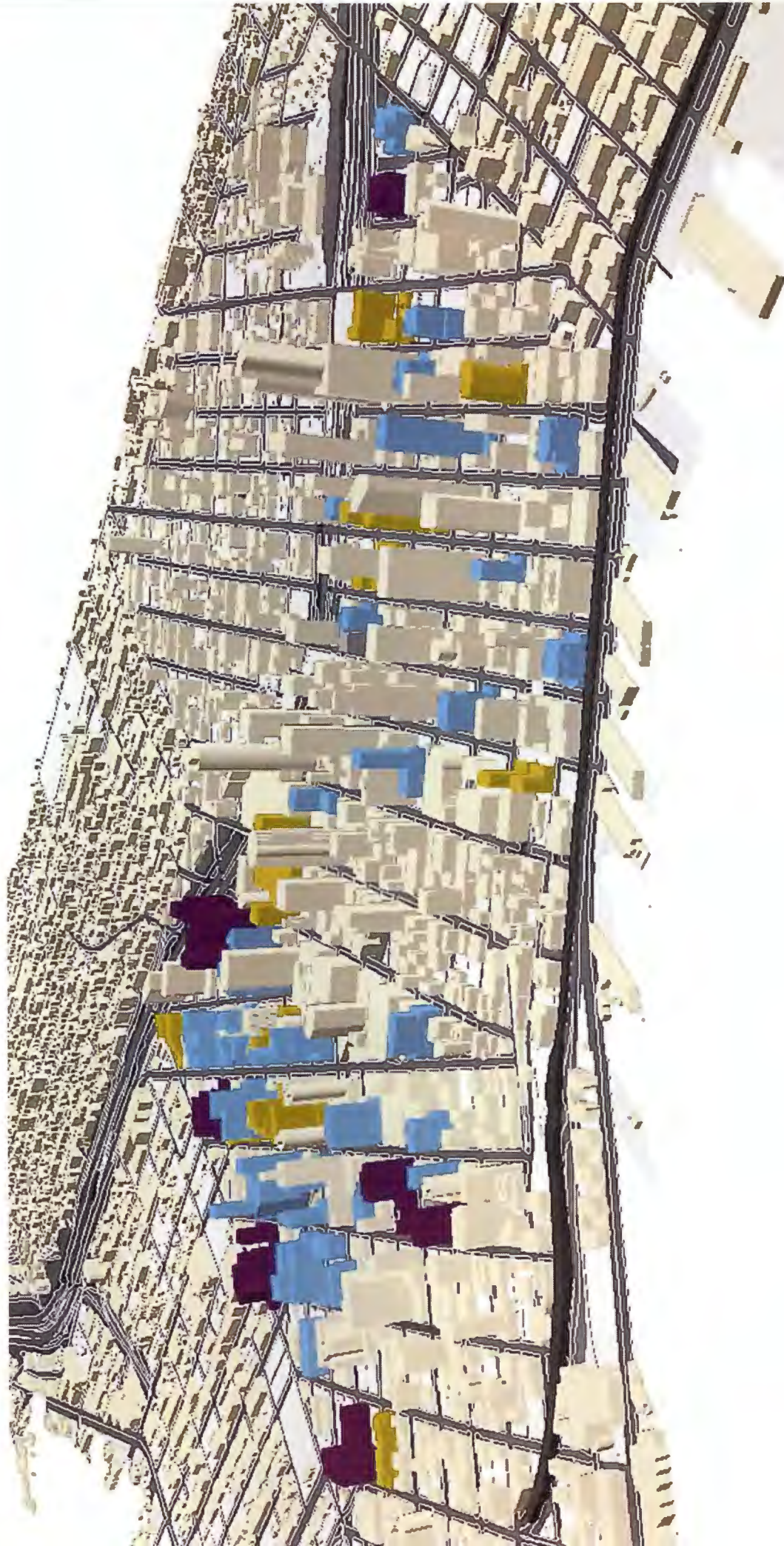
the Downtown office core and DMC zones as large as the zoning allows, but buildings built at this scale under the Preferred Alternative would be considerably less bulky than buildings allowed under current zoning, and less bulky than commercial development under the Preferred Alternative, especially on the upper floors.

Figure 14 provides a more detailed look at the differences in the zoning envelopes for residential development in the DMC under existing conditions and the Preferred Alternative. The upper portion of the graphic compares the permitted building envelopes that define the maximum building bulk allowed, while the lower portion shows images of buildings that more closely reflect what might be built. Under existing conditions, there is no limit on bulk below a height of 125 feet. Above 125 feet, if the floor size is greater than 15,000 square feet, there are some restrictions on the amount of floor area that can extend within 20 feet of street property lines, but no overall limits on the width and depth of a structure up to the current height limit of 240 feet. Under the Preferred Alternative, structures with residential use above 125 feet in height would be subject to more specific bulk controls, including maximum limits on floor sizes above the height of 85 feet and maximum limits on the width and depth of structures. Within these limits, floor sizes can be averaged, but are also required to be narrower in the upper third of the tower. In order to build to the maximum floor size allowed, and add floors up to the maximum height limit of 400 feet, a project would have to contribute to an affordable housing mitigation program.

Figures 15 and 16 illustrate the cityscape as viewed from Elliott Bay under existing zoning and with the Preferred Alternative, respectively. These graphics show that, under the Preferred Alternative, towers would be noticeably taller in the northeast portion of the Downtown study area. However, with more slender towers, the overall massing of development is generally less compact, providing a greater sense of openness. In the existing office core area to the south, the scale of existing development and more limited amount of new development would make the differences under the two scenarios less apparent. In fact, the building that will likely be most noticeable because of its size and location is the new Washington Mutual Tower now under construction.

Figures 17 and 18 illustrate the relative changes expected in the cityscape as viewed from north of Denny Way, under existing zoning and with the Preferred Alternative, respectively. These graphics best depict the differences that would likely result from the proposed changes. Overall, under the Preferred Alternative, there are fewer buildings, with less development pushing out to the far edges of the Denny Triangle—the exception being some taller residential structures at scattered locations. Closer to the core, towers are noticeably taller under the Preferred Alternative, but development on the larger sites in the area appears less compact, since the added height allows taller buildings to free up more space on the site. Overall, under the Preferred Alternative, there is also greater variation in the skyline profile than the more “tabletop” profile anticipated under existing conditions as a result of more restricting height limits.

Figures 19 and 20 illustrate the relative changes expected in the cityscape as viewed from Capitol Hill. The location of this perspective is slightly different than shown in the Draft EIS, because it locates the viewer at Melrose Avenue. These graphics show the differences in future views of the cityscape from this portion of Capitol Hill.



LEGEND

New (since 2000)/Under Construction

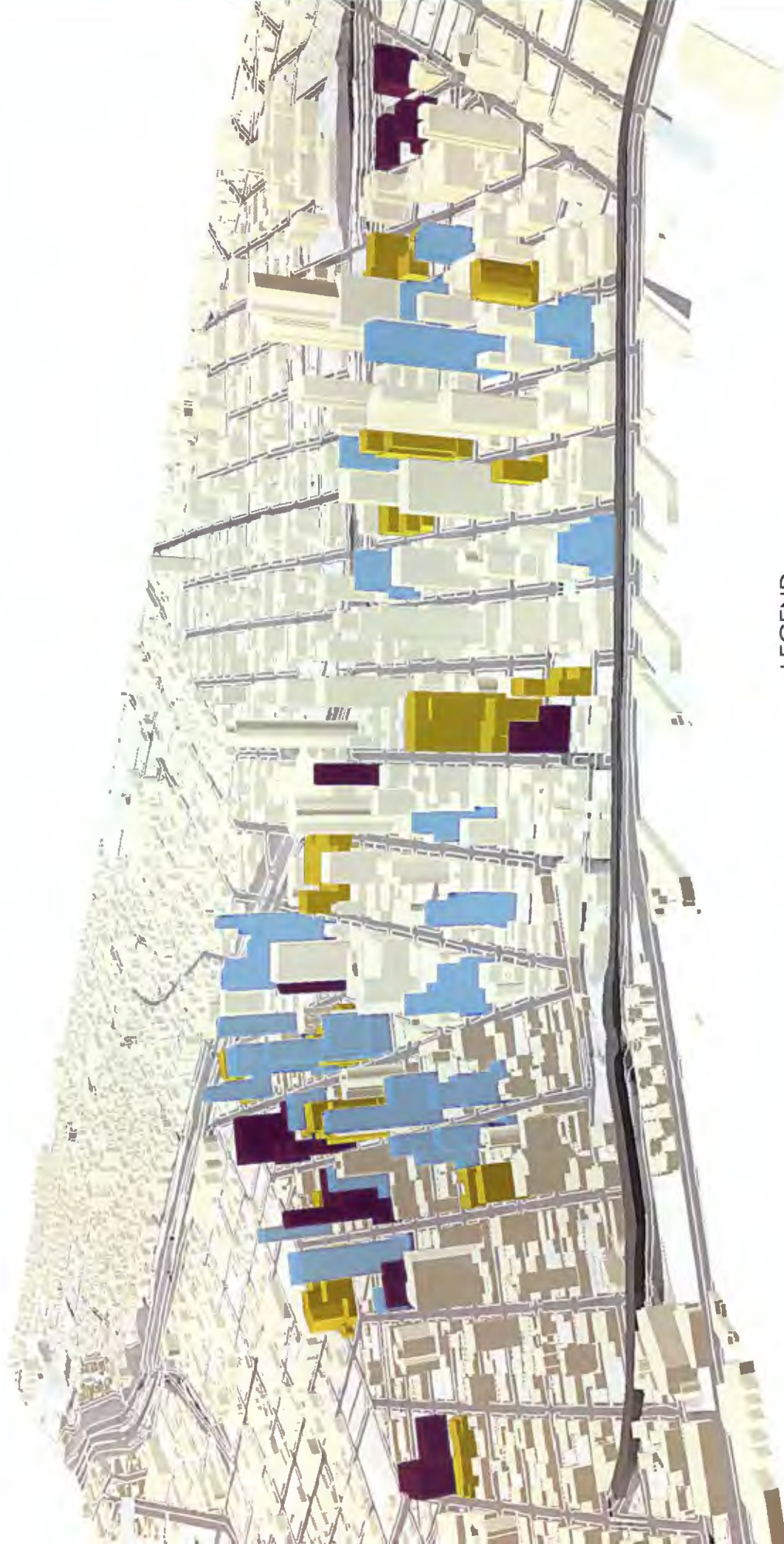
Potential

Currently Permitted/Proposed

*Note: Site Status as of 2002

FIGURE 15.

Cityscape view from West
 Existing Conditions (Alternative 4)



LEGEND

New (since 2000)/Under Construction

Potential

Currently Permitted/Proposed

* Note: Site Status as of Jan. 2005

FIGURE 16.
Cityscape view from West
Preferred Alternative

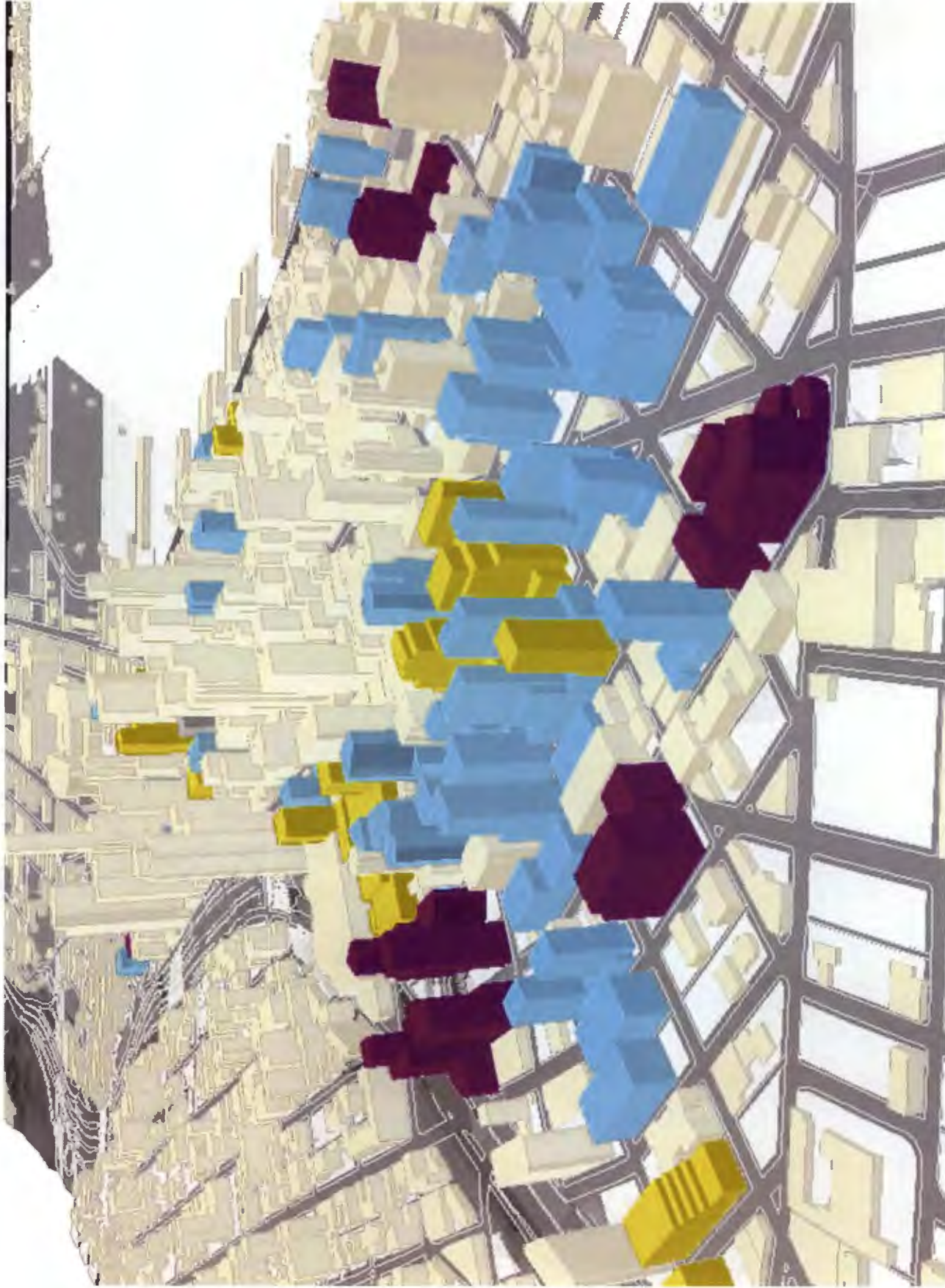


FIGURE 17.

Cityscape view from North
Existing Conditions (Alternative 4)

LEGEND

- New (since 2000)/Under Construction
- Potential
- Currently Permitted/Proposed

*Note: Site Status as of 2002

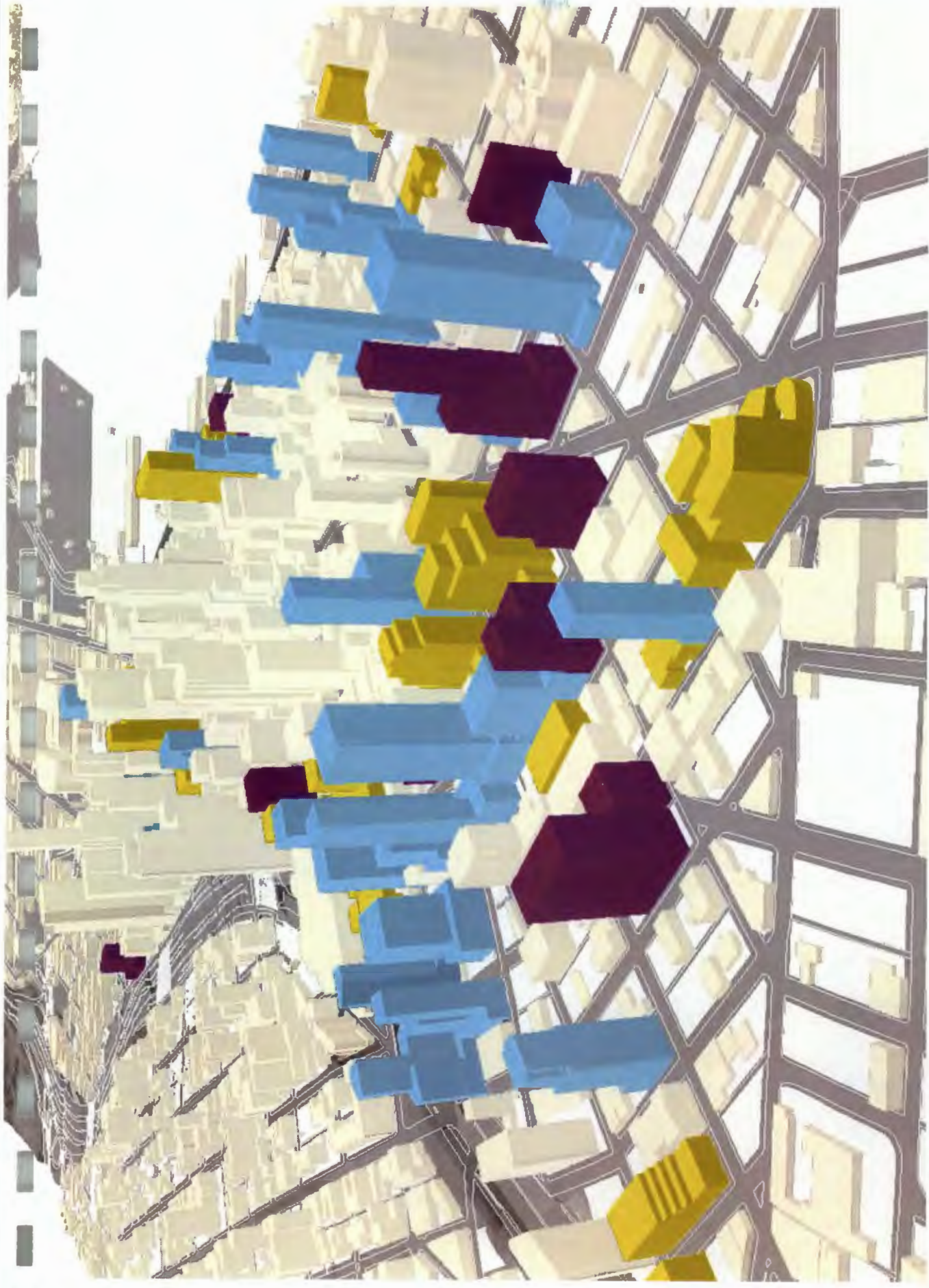


FIGURE 18.

Cityscape view from North
Preferred Alternative

LEGEND

Yellow New (since 2000)/Under Construction

Blue Potential

Dark Purple Currently Permitted/Proposed

Downtown Height and Density Changes Final EIS

* Note: Site Status as of Jan. 2005



FIGURE 19.

Cityscape view from Capitol Hill Existing Conditions (Alternative 4)

LEGEND

- New (since 2000)/Under Construction
- Potential
- Currently Permitted/Proposed

*Note: Site Status as of 2002

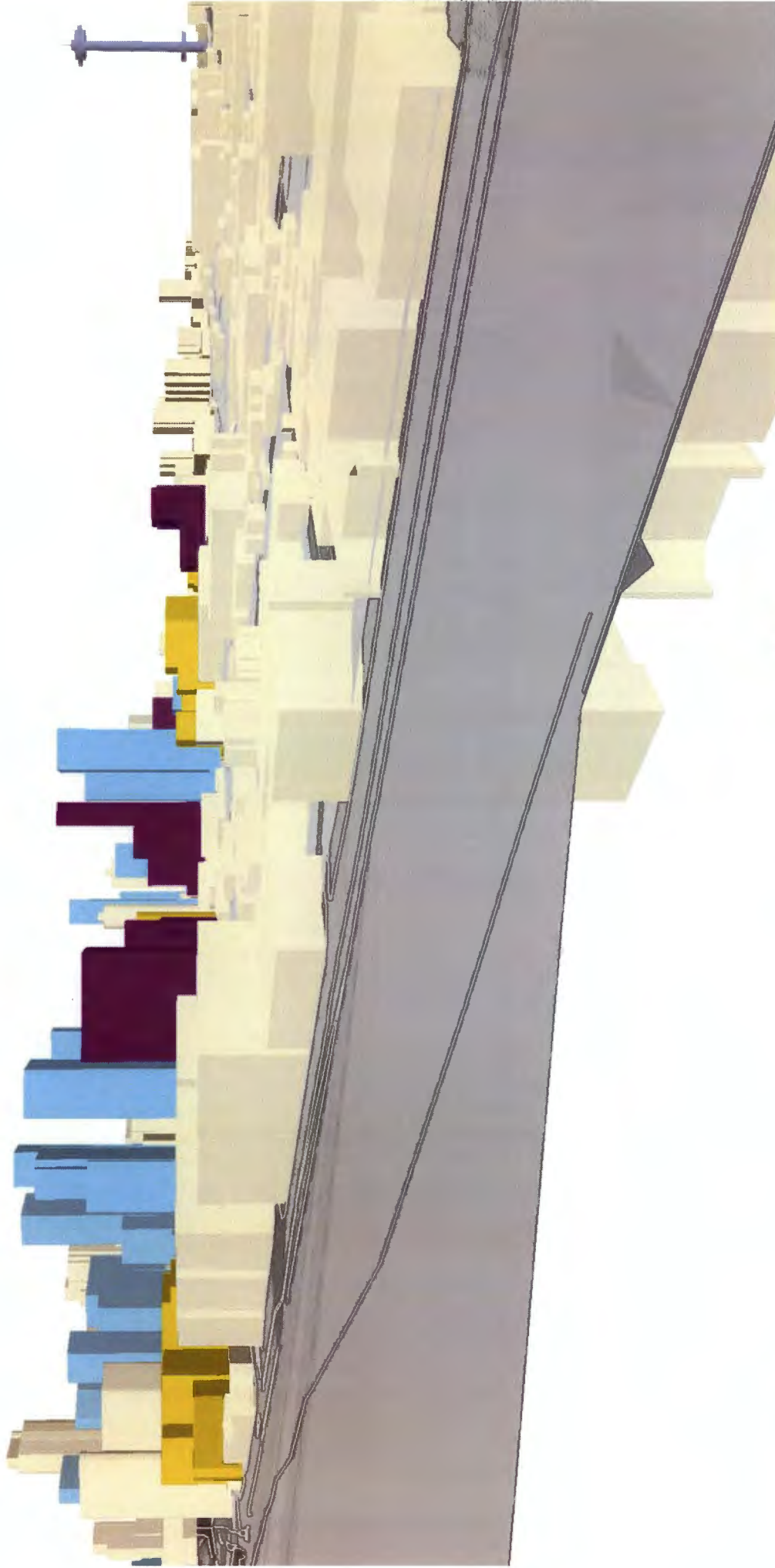


FIGURE 20.

Cityscape view from Capitol Hill
Preferred Alternative

LEGEND

- New (since 2000)/Under Construction
 - Potential
 - Currently Permitted/Proposed
- * Note: Site Status as of Jan. 2005

Proposed rezone of two half-blocks on Second Avenue from Downtown Retail Core to Downtown Mixed Commercial

This proposed rezone that is part of the Preferred Alternative would change two half-blocks on the east side of Second Avenue between Pine and Union Streets from the Downtown Retail Core zone to the Downtown Mixed Commercial zone. This area is part of a three half-block area that the Commercial Core Neighborhood Plan had asked to be considered for rezone to DMC. In 2001, the City adopted a rezone from DRC to DMC 240' of one half-block directly to the north of these two half-blocks. These two half-blocks had also been reviewed at that time for rezoning to DMC, but this did not occur, due in part to public comments opposing the changes. Instead, a Land Use Code revision in SMC 23.49.008A5 was made, to allow additional height up to 195 feet in these two half-blocks if all portions of a structure above 85 feet in height contain only residential use.

Land Use

Like most large cities, Downtown Seattle's core is comprised of many sub-districts with dedicated purposes and distinct character, such as the retail core, the office center, the government center, and Pike Place Market. At an even finer grain, the character and pattern of uses may vary on a block-by-block basis or within clusters of a few blocks, contributing to different perceptions about comfort and attractiveness.

The proposed rezone area consists of two half-blocks located between the major activity centers of the retail core and the Pike Place Market, within the two blocks immediately north of Benaroya Hall. These half-blocks are part of a localized district that over many years has seen few improvements attractive to pedestrians and customers. While the First Avenue corridor has experienced marked improvement in quality of aesthetics and street-level uses over the past 20 years, and areas to the south have benefited from the attractiveness of Benaroya Hall and the Seattle Art Museum, this vicinity is less attractive. The Newmark mixed-use building on the west side of Second Avenue is an exception, but even the Newmark has had varying degrees of success in maintaining use of its ground-floor commercial spaces.

This vicinity's land use patterns include a variety of small, older buildings used for many retail, commercial and residential purposes, as well as parking lots and garages that contribute to a marginal quality in streetscape and attractiveness, both in aesthetic and commercial terms. On the two half-blocks affected by the proposed rezone, existing uses include: two parking garages with street-level retail and office uses, two surface parking lots, the Columbia Building (in commercial use) and the Haight Building (accommodating the 42-unit Second and Pine Apartments plus street-level retail use). No landmarks are present within this rezone area.

Notable buildings and uses in the vicinity include: Benaroya Hall to the south, the Newmark to the west (south of Pike), and the Doyle Building, Green Tortoise Hostel, and 2nd and Pike Building to the west (north of Pike). The Broadacres Building (a landmark that contains the Nordstrom Rack) lies across Pine to the northwest from the proposed rezone area. Buildings on the other halves of the two affected blocks include: the 1423 3rd Avenue and Mann Buildings (Wild Ginger Restaurant at ground floor) in the block south of Pike, and the Olympic and Melbourne Towers, Fischer Studio and Lerner buildings in the block north of Pike. Of these buildings, the Doyle, Broadacres, Mann and Olympic Tower buildings are landmarks designated by the City of Seattle.

Over the past ten years or so, numerous uses in the heart and eastern portions of the retail core have revitalized the popularity and attractiveness of Downtown shopping. However, that resurgence has not had much effect on Second Avenue and only a modest positive effect along Third Avenue. Neither has the Second Avenue corridor benefited much from proximity to the Pike Place Market. Within the context of "micro-climates" of attractiveness for retail uses, these two half-blocks on the Second Avenue corridor are only a minimally functioning part of Seattle's Downtown retail core. They share more in common

with the use pattern of blocks to the west, which are those in proximity to the Pike Place Market. Also of interest, recent announcements of development proposals in this vicinity have not emphasized retail-oriented uses but have concentrated more on residential structures or hotel uses, with residential uses planned for upper levels. This includes a pending proposal at the southwest corner of 1st Avenue and Union Streets, a residential tower at the northeast corner of 2nd and Pike, and the potential of another residential tower mid-block on the west side of 2nd Avenue between Pike and Pine Streets, adjacent to a proposed monorail station. A previous development proposal for the one half-block that was earlier rezoned to DMC 240' included a combination of retail, hotel and housing, but there has been no recent activity related to the permit application. It is also worthwhile to note that the monorail will pass through this Second Avenue corridor.

Given the characteristics and trends described above, it is logical to consider rezoning these two half-blocks away from the Downtown Retail Core zone to the Downtown Mixed Commercial zone, similar to blocks to the north, south and west. Indeed, an analysis of zone function and the relative match between zone criteria and area characteristics confirms that a DMC zone would be appropriate at this location. While the City's planning and zoning principles support vitality and retail-oriented growth in the retail core, these two half-blocks' location at the periphery of the retail core, their relatively low performance in retail uses, and their limited attractiveness for retail core-oriented uses are indicators that a rezone away from the DRC zone can be considered. Also supporting a rezone is the potential that these areas could be more compatibly woven in with the use patterns of buildings to the west and south (e.g., the Pike Place Market and the symphony hall/art museum district), and the emerging mixed-use character of Second Avenue. These positive aspects tend to indicate a reasonable level of consistency with the City's land use plans and policies for Downtown, which support efficient and attractive forms of development that will enliven the urban environment.

Under the Preferred Alternative, the adjoining DMC zones would see an increase in height limit to 400 feet only for buildings including residential uses, and a 240-foot height limit (similar to existing conditions in DMC areas) for commercial uses. The Preferred Alternative also would not change the maximum FAR (density) limit of 7 for DMC in this vicinity, meaning no increase in permissible density of buildings.

The proposed rezone from DRC to DMC would mean that the maximum FAR (density) limit on the two half-blocks would increase from 5 to 7, and the maximum height limit for buildings including residential uses would increase from a maximum of 195 feet (using allowances in SMC 23.49.008A5) to a maximum of 400 feet. The maximum for commercial-only buildings would increase from 85 feet to 240 feet. With these changes, development capacity in the affected area would increase. Per the City's methodology for calculating development capacity, the sites most likely to redevelop are those where the property value is significantly greater than the value of the structural improvements. Using this methodology, two properties in this affected area would be considered likely to redevelop. The most likely scenario would be that one site develops in predominantly residential uses and the other identified site develops in commercial uses. The associated increase in development capacity with the rezone would then be approximately 152 dwelling units and 13,000 square feet of commercial space.

Population, Employment and Housing

By increasing the development capacity available on these two half-blocks, this proposed rezone would expand the capability to accommodate additional resident and employee populations within a central part of the Downtown core. Within the context of growth management, including the positive effects that accrue when a core area is better able to accommodate efficient residential and employment growth, this proposed change would not represent an adverse impact. It would also imply an increase in the overall

potential activity levels of this two-block vicinity, which in the context of revitalizing this localized portion of the Downtown core is also interpreted as not representing an adverse impact.

Height, Bulk and Scale

Height

With the proposed change from DRC to DMC, the maximum height limit for buildings including residential uses would increase from a maximum of 195 feet (using allowances in SMC 23.49.008A5) to a maximum of 400 feet. The maximum for commercial-only buildings would increase from 85 feet (with an increase to 150 feet possible under special conditions) to 240 feet. This would be a relatively large increase for these two half-blocks given the current presence of primarily 2-story to 12-story buildings, but it would fit in with the zoning changes that would occur on the other properties to the north, west and south of the subject properties, due to other proposed changes in the Preferred Alternative.

Bulk: Density, massing and height/density relationships

The proposed changes to DMC on these properties would increase the potential bulk that could occur in future development. With the current DRC zone, the potential building bulk for commercial structures has been controlled by the maximum FAR limit of 5 in the DRC zone, while all uses are subject to upper-level development standards specific to the DRC zone. The proposed rezone to DMC would increase the maximum FAR limit to 7, which means more potential for building bulk in commercial uses, as well as the additional bulk that could occur with residential development that does not count against the FAR limit. However, the proposed bulk controls in DMC areas in the Preferred Alternative for residential structures above 125 feet would establish limits on floor sizes of residential towers, which would result in less bulky structures than is possible on larger sites under existing DRC provisions for structures extending to the current 195-foot height limit. Compared to the existing buildings in the immediate vicinity, the bulk of future development would be noticeably larger. Furthermore, the existing DRC requirement for an upper-level setback along Pike Street would not apply in the DMC zone.

Scale: Transitions

As part of the proposed rezones in the Preferred Alternative that would establish a scale of 240 and 400-foot height limits for commercial and residential/mixed-use buildings, respectively, in the DMC zone, the proposed rezone from DRC would allow these two half-blocks to fit with the scale of the adjacent blocks that is proposed by the Preferred Alternative. This would generally be considered a transitional area between the higher height limits of the core office areas and the lower height limits of areas to the west. However, the proposed scale would be noticeably larger than the predominant existing building scale.

Pedestrian Amenities and Streetscape

With the proposed rezone, the type of pedestrian amenities and street-level uses likely to result on these two half-blocks would be similar to what would occur under existing zoning. Given the relatively low quality of the existing streetscape and street-level uses, future development would likely contribute to improved conditions overall.

Parks and Open Space

With the proposed rezone, the affected sites would likely be more attractive for future redevelopment, which would discourage the prospects for them to be instead used as open space. Given the rules that apply to DMC and DRC zones, the proposed change would not have any effect on the chances of public plazas being provided with future development, since these are not bonusable in either zone. With the proposed DMC zone and higher height limit, there would be some modest increase in the potential for future development to utilize open space TDR or a floor area bonus for a parcel park, which could be a

positive impact. However, on the whole, differences in park/open space impacts due to the proposed rezone are likely to be minor.

Views and Aesthetics

Viewpoints and skyline views

Skyline views and views from viewpoints would be only modestly affected by the proposed rezone. From Kerry Park, potential future development on the affected properties might be visible in the western portion of the skyline, extending up a bit further than the other buildings (depending upon how tall the new buildings would be), but not blocking the Mount Rainier vista. At Hamilton Viewpoint in West Seattle, the potential future buildings likely would be visible as part of the foreground of the cityscape. Views of future buildings from Capitol Hill likely would be minimal. The view of the skyline from Victor Steinbrueck Park would likely include the upper portions of future buildings on the subject properties, if those buildings extended up past approximately 20 stories. This would add to the skyline view without detracting or blocking notable skyline view features.

Views toward landmarks

Two buildings, the Olympic Tower and the Mann Building, are view-protected landmarks that are located on the other halves of the two blocks proposed for changes. Despite that proximity, the proposed changes are not likely to result in significant adverse impacts to these buildings. Future development on the subject properties would not be likely to block views toward these landmark buildings in a significant adverse manner. The primary views of these buildings occur from Third Avenue, Union and Pine Streets. While buildings on the rezoned properties could act as adjacent "backdrops" in views to the landmarked buildings, design review processes would be able to account for site-specific design relationships to the existing landmarks.

Scenic routes

The Alaskan Way Viaduct and the Harbor Avenue (Alki) scenic routes are the routes most likely to be able to view potential future buildings on the subject sites. From the Viaduct, views from automobiles could newly include those buildings in views of the cityscape. From Alki, the potential future buildings would add to the cityscape, potentially being fairly visible due to their position in front of other larger buildings that are located further to the east, such as the Pacific First Centre. Neither of these types of changes in views are considered adverse impacts.

Shadows and Wind

The proposed rezone would increase the potential height of future development by approximately 200 feet and the potential size by 2 FAR. This would contribute to slightly greater potential for shadowing impacts, in a manner similar to other development that might occur in this vicinity. Given its location, there is only minor potential that additional shadowing would contribute to significant adverse impacts. The shadows from potential future development would be unlikely to significantly affect the Pike Place Market, for example, due to the distance from the Market area. Potential impacts are also not identified with respect to public parks. Potential adverse wind impacts would likely be avoided through review of individual projects and provision of features such as overhead weather protection.

Energy

At this level of environmental review, the analyses for this EIS have not identified issues of system capacity or limitations on the ability to provide service to future growth in the relevant two half-blocks. Any future development would need to consider during design processes the exact nature of electrical system improvements necessary to serve that development, in coordination with City Light staff. Given

the research and findings of this EIS and the design and planning work that would be necessary for any future development, there is a low potential for significant adverse impacts on energy systems at these locations as a result of this proposal.

Transportation and Parking

At the Downtown-wide level of environmental review, this proposed rezone of two half-blocks would not substantively alter the traffic impact analyses provided in this EIS. However, for this immediate vicinity, the proposed increase of 2 FAR in maximum density (between DRC and the proposed DMC zone) would result in additional potential traffic generation with future development of these two half-blocks. Availability of transit options including bus, light rail and monorail would aid future users in reaching these sites, reducing to some extent the maximum vehicle trip generation.

Future development would likely result in the displacement of surface parking and might possibly also eventually displace one or two existing parking garages. This would reduce the local parking supply, although new on-site parking would to some degree offset this reduction. Given City policies that discourage commuter-oriented parking, this projected reduction in parking is not identified as a significant adverse impact.

Water Utility

At this level of environmental review, the analyses for this EIS have not identified issues of system capacity or limitations on the ability to provide service to future growth in the relevant two half-blocks. It should be noted that while the Draft EIS reported two areas as having localized fire flow deficiencies within the study area, this particular vicinity of Second Avenue between Pine and Union Streets was not identified as having specific deficiencies. Any future development would need to consider (in coordination with City staff) whether unusual water utility infrastructure improvements would be necessary to serve that development. Given the research and findings of this EIS and the design and planning work that would be necessary for any future development, there is a low potential for significant adverse impacts on water utility systems at these locations as a result of this proposal.

Sewer and Stormwater Utilities

Similar to the conclusions expressed above for water utility and energy systems, analyses to date have not identified issues of system capacity in these locations, but any future development would need to consider (in coordination with City staff) whether unusual sewer/stormwater utility improvements would be necessary. Given the research and findings of this EIS and necessary future design/planning work for future development, there is a low potential for significant adverse impacts on sewer/stormwater utility systems at these locations as a result of this proposal.

Table 7
Summary of Impacts

Alternative 1 High End Height and Density POPULATION AND EMPLOYMENT Impacts	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
• Employment Growth: Commercial capacity could accommodate as much as 48 years worth of employment growth, resulting in as many as 338,000 employees in Downtown Seattle.	• Commercial capacity could accommodate as much as 42 years worth of employment growth, resulting in as many as 319,000 employees in Downtown Seattle.	• Commercial capacity could accommodate as much as 38 years worth of employment growth, resulting in up to 305,000 Downtown Seattle employees.	• Commercial capacity could accommodate as much as 37 years worth of employment growth, resulting in up to 300,000 employees in Downtown Seattle.	• Similar to Alternative 1. Increases in capacity in the DOC 1 and most of the DOC 2 zones and some DMC areas would be identical to Alternative 1, while in other areas, capacity would remain the same as under current zoning.
• In 20 years, there could be an increase of between 50,000 and 71,000 new Downtown employees.	• Same as Alternative 1	• Same as Alternative 1	• Same as Alternative 1	• Same as Alternative 1
• Population Growth: Residential capacity could accommodate as much as 26 years of demand for Downtown housing.	• Population Growth: Residential capacity could accommodate as much as 27 years of demand for Downtown housing.	• Population Growth: Residential capacity could accommodate as much as 30 years of demand for Downtown housing.	• Population Growth: Residential capacity could accommodate as much as 29 years of demand for Downtown housing.	• Population Growth: Proposed increases in height for residential use in almost every zone would likely result in more capacity for housing than under all other Alternatives.
• In 20 years there could be an additional 21,900 new Downtown Seattle residents in 17,500 new Downtown households.	• Same as Alternative 1.	• Same as Alternative 1	• Same as Alternative 1	• Same as Alternative 1.
• Approximately 13% of new households could earn less	• Approximately 17% of new households could	• Approximately 15% of new households could	• Approximately 11% of new households could	• Based on relative comparison to Alts. 1

Alternative 1 High End Height and Density than 80% of the median income in King County.	Alternative 2 Concentrated Office Core earn less than 80% of the median income in King County.	Alternative 3 Residential Emphasis earn less than 80% of the median income in King County.	Alternative 4 No Action Alternative earn less than 80% of the median income in King County.	Preferred Alternative and 3, the probable estimate is that approximately 13-15% of new households could earn less than 80% of the median income in King County.
HOUSING Impacts • Capacity for Housing: There could be capacity for as many as 22,855 new units in Downtown Seattle. • TDC Program: The Denny Triangle Transfer of Development Credits (TDC) program would no longer be viable under this Alternative.	• Capacity for Housing: There could be capacity for as many as 24,800 new units in Downtown Seattle. • TDC Program: The Denny Triangle TDC program would only be active in the DMC zones. It would create additional capacity for as many as 2,630 new units.	• Capacity for Housing: There could be capacity for up to 27,440 new units in Downtown Seattle. • TDC Program: The Denny Triangle TDC program would be active in the DMC zones and portions of the DOC2 zone. It would create additional capacity for as many as 4,400 new units.	• Capacity for Housing: There could be capacity for as much as 26,410 new units in Downtown Seattle. • TDC Program: The Denny Triangle TDC program would be active in all Denny Triangle neighborhoods. It would create additional capacity for as many as 5,300 new units.	• Capacity for Housing: Proposed increases in height for residential use in almost every zone would likely result in more capacity for housing than under all other Alternatives. • TDC Program: The TDC program would no longer be viable under this Alternative. However, limiting maximum height increases to residential use in DMC zones and some DOC 2 areas in the Denny Triangle would likely result in additional capacity for housing, in a range between Alts. 2 and 3. • Same as Alternative 1.
• Housing Types: Market-rate housing is most likely to be	• Same as Alternative 1.	• Same as Alternative 1.	• Same as Alternative 1.	

Alternative 1 High End Height and Density	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
built in towers as part of mixed-use projects. Subsidized units are more likely going to be built in lower-scale residential structures. • Housing Bonus Program: The Housing bonus program might leverage sufficient funds to build up to 2,675 units affordable to households earning less than 80% of King County's Median Annual Household Income (MAI) over twenty years.	• Housing Bonus Program: The Housing bonus program might leverage sufficient funds to build up to 3,225 units affordable to households earning less than 80% of MAI over twenty years. • Same as Alternative 1.	• Housing Bonus Program: The Housing bonus program might leverage sufficient funds to build up to 2,775 units affordable to households earning less than 80% of MAI over twenty years. • Same as Alternative 1.	• Housing Bonus Program: The Housing bonus program might leverage sufficient funds to build up to 2,025 units affordable to households earning less than 80% of MAI over twenty years. • Same as Alternative 1.	• Housing Bonus Program: The number of affordable units the housing bonus program might leverage would likely be in a range between Alts. 2 and 3. Furthermore, the Preferred Alternative includes affordable housing incentives for residential projects that would provide a new source of funding not available in any of the other alternatives. • Same as Alternative 1.
• Demolition of Existing Residential Buildings: Up to six residential buildings with 300 residential units are on sites that could be redeveloped. Three of the six buildings, with 141 dwelling units, receive subsidies to keep their units affordable to households earning less than 50% MAI.				

Alternative 1 High End Height and Density LAND USE Impacts	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
• Development Capacity: There would be capacity for over 38 million square feet of new commercial space and 10,500 new units within the study area.	• Development Capacity: There would be capacity for over 33 million square feet of new commercial space and as many as 11,900 new units within the study area.	• Development Capacity: There would be capacity for over 30 million square feet of new commercial space and as many as 14,600 new units within the study area.	• Development Capacity: There would be capacity for over 28 million square feet of new commercial space and 13,750 new units within the study area.	• Development Capacity: Development capacity for commercial space would likely be most similar to Alternative 1, while capacity for new residential units would likely be similar to Alternative 3.
• Up to 244 Downtown parcels containing 72 acres have been identified as potential sites for redevelopment.	• Same as Alternative 1.	• Same as Alternative 1.	• Same as Alternative 1.	• Same as Alternative 1.
• Over twenty years, approximately 17.5 million square feet of commercial space would be built in the study area. Almost 45% of the commercial space might be built within the Denny Triangle DOC2 zone, with another 25% built in the Commercial Core DOC1 zone.	• Similar to Alternative 1.	• Similar to Alternative 1.	• Similar to Alternative 1.	• Similar to Alternative 1.
• Over twenty years, approximately 7,400 units would be built within the study area. Approximately 60% of those units might be built in mixed-use projects in the Denny Triangle DOC2 zone.	• Similar to Alternative 1.	• Similar to Alternative 1.	• Similar to Alternative 1.	• Similar to Alternative 1.
• One City of Seattle Landmark and one site on	• Same as Alternative 1.	• Same as Alternative 1.	• Same as Alternative 1.	• Similar to Alternative 1.

Alternative 1 High End Height and Density	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
the National Register have been identified as potential development sites. HEIGHT, BULK AND SCALE Impacts • Height: New buildings by height range: Approx. 36 structures greater than 250 feet in height (65% of new structures). • Bulk/Density: Predicted to result in 39 developments with 55 structures by 2020. • Additional bulk from exempted residential uses and a few "other" uses would contribute to actual building bulk legally exceeding maximum density limits. • Bulk Massing Patterns: Greatest massing of bulk would occur in the Denny Triangle. Rectangular shape of blocks would contribute to perceived bulkiness of development in the Denny Triangle. • New development in peripheral areas would be more dispersed, except for potential concentration at	• Approx. 31 structures greater than 250 feet (55% of new structures). • Nearly the same as Alt. 1—40 developments with 56 structures. • Similar to Alt. 1, but fewer developments would achieve the higher end of densities. • Similar to Alt. 1, but lower scale of development at periphery. • Similar to Alt. 1, but lower scale of development at periphery.	• Approx. 28 structures greater than 250 feet (47% of new structures). • Bulk would be spread across more projects: 44 developments and 60 structures. • Fewer developments than Alts. 1 or 2 would reach higher densities, due to lower height limits and more bulk controls. • Retention of existing height and density at east and west edges of Denny Triangle DOC 2 zone would provide some "stepping down" in massing of bulk. • Similar to existing zoning, but more bulk controls in some areas may result in residential towers that are more	• Approx. 26 structures greater than 250 feet (41% of new structures). • Bulk would be spread across more projects: 48 developments and 63 structures. • Similar to Alt. 3. • Similar to Alt. 1, but less-bulky development spread over more sites in Denny Triangle. • Similar to Alt. 3 but no additional bulk controls would allow some bulkier new development.	• Approx. 34 structures greater than 250 feet (65% of new structures) • Similar to Alternative 1 with 41 developments and 52 structures. • Similar to Alt. 1, but additional height with bulk controls on residential use would continue to result in developments achieving the higher end of densities. • In general, increased densities proposed in the office core zones and higher height limits for residential and mixed-use projects result in fewer new structures overall compared to other alternatives. • Concentration of larger structures in the DOC 1 zone in the Commercial Core and

Alternative 1 High End Height and Density edge of Belltown.	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis slender.	Alternative 4 No Action Alternative	Preferred Alternative
				in the DOC 2 area between 6th and 9th Avenues and along the Olive Way/Pine Street corridor in the Denny Triangle. - Fewer structures, or at least fewer structures built to the maximum height allowed, may be required on large development sites to accommodate the permitted commercial density, potentially resulting in less compact massing on the site, and with the potential to site taller portions of structures more to the center of the site, rather than to being pushed out closer to the street edges. - Taller residential structures are expected to occur in the DMC 240'/400' zone extending along the western edge of the Commercial Core and southern edge of Belltown, with additional tall residential structures appearing on the periphery of the Denny

Alternative 1 High End Height and Density	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
• Bulk—Height/density relationships: Alt. 1 changes may not resolve an existing zoning issue (relating to allowable height and bulk) that results in bulkier building designs. • It may be difficult to fit all of the maximum commercial density within proposed DMC height limits between 165 and 225 feet (near Denny Way, and 1st Ave/Western Ave vicinity). • Scale—Transitions: Greatest differences among the alternatives in zoning height/density with adjacent areas (Pike/Pine, Denny Way, Belltown, Pioneer Square/Int. District, harborfront, retail core).	• Similar to Alt. 1 • Without these changes, this impact would not occur. • Fewer changes in transitions than Alt. 1, due to no changes in zoning near Belltown, Denny Way, or 1st Ave/ Western Ave vicinity.	• Similar to Alt. 1. • Without these changes, this impact would not occur. • Lower commercial density limit, additional bulk limits for towers would make transitions more gradual in the Denny Way, Belltown and 1st Ave./Western Avenue vicinities.	• The existing zoning issue would remain. • Not applicable. • Transitions provided by the existing zoning pattern would be maintained.	Triangle. • Increased height limits would allow for more variation in the skyline profile under the Preferred Alternative compared to the “tabletop” profile that is expected under existing conditions. • Increased heights in DOC 1 and DOC 2 areas and DMC areas where current density limits are maintained should allow permitted commercial density to be accommodated in less bulky-appearing structures. Conditions should remain similar in DMC areas where the relative increase in maximum density is similar to the increase in height. • Maintaining current commercial density limits in existing DMC and DOC 2 transition areas along Denny Way and I-5 in the Denny Triangle, along the southern edges of Belltown, and western and southern edges of the Commercial Core

Alternative 1 High End Height and Density	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
• Scale—Compatibility with existing development: Intensity of new development in Denny Triangle would generate the greatest differences in compatibility with existing development. • Scale—Effect on development diversity: The amount of redevelopment in Denny Triangle could potentially result in a more homogeneous character. • Scale—Effect on residential character: Overall additional bulk of development and mixing of residential and non-residential projects could discourage achievement of a beneficial residential character.	• Less impact than Alt. 1 in the peripheral DMC zones. Similar impacts to Alt. 1 in Commercial Core. • Similar to Alt. 1. • Similar to Alt. 1.	• Alt. 3 changes would promote greater compatibility in residential-oriented zones. Similar to Alt. 1 for the DOC office core zones. • Similar to Alt. 1, but broader potential range of scale in new structures. • Residential-oriented zoning in some areas creates some greater potential for achieving beneficial residential character.	• Similar to Alt. 1, except for DMC zones where no zoning changes would occur. • Similar to Alt. 1, but the broadest potential range of scale in new structures. • Similar to Alt. 1.	would provide for transition in density of development. Although heights would be increased in these areas for residential use, additional bulk controls would help maintain transition in scale. • Most similar to Alt. 1. • Most similar to Alt. 1. • Additional bulk controls on residential use and incentives to encourage more housing in certain areas could contribute to more residential character in these areas.

Alternative 1 High End Height and Density PEDESTRIAN AMENITIES & STREETSCAPE	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
Impacts Positive Impacts: • Narrow sidewalks would be widened. • Additional street trees would be provided. • Green Street improvements would be provided. • Continuous street level uses would be promoted along several streets, aided by infill development over time. • New public open spaces in developments should benefit pedestrians. Adverse Impacts: • Above-grade parking could detract from street-level character. • In some areas, non-requirement of street level uses could limit street level activity in buildings. • There would be a greater sense of "enclosure" within several streets. • In some areas, possible loss of older structures may diminish variety & pedestrian orientation at street level.	Positive Impacts: • Similar to Alt. 1. Even in areas with retained zoning (in DMC zones), the streetscape conditions as perceived by pedestrians would not be much different than would occur under Alt. 1. Adverse Impacts: • Similar types of impacts as under Alt. 1. However, lack of zone changes in DMC areas would mean buildings less dense and lower in height in these areas than under Alt. 1.	Positive Impacts: • Similar to Alt. 1, except greater chance for positive street environment in the residential-zoned areas, due to lower bulk limits. Lack of zone changes in some DOC 2 areas would avoid some streetscape effects related to greater building bulk. Adverse Impacts: • Similar types of impacts as under Alternative 1, but somewhat less potential for impacts, due to residential-oriented zoning changes in some areas, and lack of change in some DOC 2 areas.	Positive Impacts: • Same amount of growth would be accommodated on more properties than under Alt. 1, providing more opportunities for streetscape improvements, including Green Streets. Adverse Impacts: • Same amount of growth on more properties than under Alt. 1 would have additional risk of adverse impacts occurring along some streets, as listed under Alt. 1.	Positive Impacts: • Similar to Alt. 1 in general and Alt. 3 regarding additional controls on residential bulk. Adverse Impacts: • Similar to Alt. 1, although additional screening requirements for residential parking would ameliorate this negative impact.

Alternative 1 High End Height and Density PARKS & OPEN SPACE	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
Impacts • <i>Predicted on-site open space developed in future projects:</i> 1.7 acres • <i>Use of open space TDR:</i> The potential supply of open space TDR is approx. 1.0 to 1.3 million square feet. Demand not expected to exceed supply. • <i>Open space required for office uses:</i> 7.9 acres • <i>Common rec. area open space required for residential uses:</i> 7.2 acres • <i>Predicted Contributions to TDC Amenity Credit Fund:</i> None, since Alt. 1 would likely terminate the use of the TDC program. • <i>Relationship to Open Space Goals - Denny Triangle</i> Even with predicted open space in future development, this area would fall a bit short of meeting the residential and employee-oriented open space goals. However, would likely meet the distribution goal.	• 1.9 acres • Supply would remain the same. Changes in DOC zones would increase demand similar to Alt. 1. • 7.7 acres • 7.2 acres - Est. \$1.2 million • Similar to Alternative 1.	• 1.9 acres • Similar to Alt. 1 and 2, but areas rezoned to DMR/C would allow slight increase in use of open space TDRs. • 7.8 acres • 6.5 acres - Est. \$3.5 million • Nearly the same as Alternative 1, except residential-zoned area could promote more residentially-oriented open space.	• 2.9 acres • Supply would be less than under Alt. 1, but Alt. 4 would allow for the greatest use of open space TDR among the alternatives. • 7.8 acres • 6.5 acres - Est. \$4.3 million • Slightly more open space in Denny Triangle, possibly spread over more area than Alternative 1.	• Similar to Alts. 1, 2 and 3. • Similar to Alts. 1 and 2. • Similar to Alts. 1, 2 and 3 • Similar to Alts. 1, 2 and 3 • None, since termination of the TDC program is likely. • Similar to Alts 1 and 2.

Alternative 1 High End Height and Density Open Space - Commercial Core	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
• Would meet or exceed the residential and employee-oriented open space goals, and would likely meet the distribution goals. • Number of future development sites adjacent to Green Streets: 10 sites	• Similar to Alternative 1. • 10 sites	• Similar to Alternative 1. • 11 sites	• Similar to Alternative 1. • 14 sites	• Similar to Alternative 1 • Slightly less than Alternative 1, with fewer projects on Denny Triangle green streets.
VIEWS AND AESTHETICS Impacts <i>Public Viewpoints</i> • Harborview Viewpoint: Possible future development at a site between Yesler Way and Jefferson St., 5th and 6th Avenues would block a view toward the south end of Elliott Bay from the Harborview Viewpoint. • Four Columns Park: With future development in the Denny Triangle, views from Four Columns Park toward the Space Needle, Olympic Mountains and Queen Anne (including the landmark Q.A. High School) would gradually be obscured. The additional increment of height/density would obscure additional sky area, but would not cause different types of visual	• Same impacts as Alternative 1. • Similar impacts to Alternative 1, but slightly less potential for more northerly views toward the vicinity near I-5 and Denny Way. Similar to Alternative 1 in potential for impairment of Space Needle and Olympic Mountains views.	• Same impacts as Alternatives 1 and 2. • Similar impacts to Alternative 2, but less potential for impairment due to omission of DOC 2 zone change east of 8th Avenue. However, similar to Alternative 1 in potential for impairment of Space Needle and Olympic Mountains views.	• No impacts. Slightly less potential for view impacts than Alternatives 1, 2 or 3 due to lower height limits in property. • No impacts. However, similar to Alternative 1 in potential for impairment of Space Needle and Olympic Mountains views. Generally, less potential for impacts than Alternatives 1, 2 or 3.	• Same impacts as Alternatives 1 and 2. • Similar impacts to Alternative 1 due to height and density increases in DMC area in Denny Triangle. However, somewhat offset by potentially fewer buildings in this area.

Alternative 1 High End Height and Density impairment than are already possible under existing regulations.	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
Views Toward Landmarks Additional building bulk (greatest allowable under Alt. 1) adjacent to or near some landmarks would contribute to their diminished prominence in the urban setting. Examples include the Camlin Hotel, Rainier Club & Terminal Sales Bldg.	Less potential for impacts than Alternative 1 because Terminal Sales Building and 1st Avenue group of landmark buildings would not be subject to influence of zone changes.	Slightly less potential for impacts than Alternatives 1 or 2, because of modest changes near Terminal Sales Building and 1st Avenue group, and lack of rezoning adjacent to the Times Square Building.	No impacts. However, the potential for impacts on views to landmarks is roughly similar under any alternative.	Slightly less potential for impacts than Alternative 1, due to maintaining commercial density and height limits in some areas and improved controls on residential building bulk.
Skyline Views Kerry Park: Future development in the Denny Triangle vicinity would further obscure views toward Cascade foothills to the southeast (already partially blocked by existing development). Belvedere Viewpoint: Future development in the Denny Triangle would fill in a portion of the skyline and further obscure views toward Cascade Mountains in the background of views from the Belvedere (W. Seattle) viewpoint. Other skyline views: Changes in skyline views would be most apparent in views from the east, from	- Slightly less potential for impacts than Alternative 1 due to omission of some zone changes. - Slightly less potential for impacts, due to lesser bulk and height in the 1st Avenue and Western Avenue vicinity. - Somewhat less potential than Alternative 1 for skyline view impacts from the east and north due to	- Slightly less potential for impacts than Alternative 1 due to identified types of view impacts with future development. - Slightly less potential for impacts than Alternatives 1 and 2. - Somewhat less potential than Alternatives 1 or 2 for skyline view impacts	- No impacts. Somewhat less potential for identified types of view impacts with future development. - No impacts. However, existing opportunities for height increases would remain. Over	- Somewhat less potential for impacts than Alternative 1 due to somewhat fewer buildings in the northeastern corner of the Denny Triangle. - Slightly less potential for impacts than Alternative 1. - While buildings would potentially reach higher heights than under Alternative 1,

Alternative 1 High End Height and Density	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
Pike-Pine and Capitol Hill areas, and views from the north. Scenic Routes - Changes in views from scenic routes would primarily involve changes in the skyline and greater presence of denser buildings in the middle ground and background. Routes most affected include: Westlake and Fairview Aves, I-5 southbound between Lakeview Blvd and Olive Way, Yesler Way, Dexter Avenue, and SR 99 southbound before Battery Street Tunnel. CLIMATE—SHADOWS AND WIND Impacts Shadows - Taller buildings in all of Denny Triangle would add to shading of city streets.	omission of zone changes in the Denny Way vicinity. Slightly less potential for impacts due to omission of zone changes in the Denny Way and 1st Avenue and Western Avenue vicinities.	due to omission of zone changes in portion of Denny Triangle. Slightly less potential for impacts due to different zone changes in the Denny Way and 1st Avenue and Western Avenue vicinities.	time, future development will change the skyline in ways similar under any alternative. No impacts. Over time, future development will add building bulk in ways generally similar under any alternative.	the new buildings would more likely be perceived as slimmer building types. Lower densities in the existing DOC 2 area near I-5 (compared to Alternative 1) would also aid in moderating impacts to skyline views. Slightly less potential for impacts than Alternative 1 due to different zone changes in the Denny Way and First Avenue and Western Avenue vicinities.
	No zone changes in peripheral areas of Denny Triangle would result in somewhat less potential for shading of city streets	Less intensive zoning in peripheral areas of Denny Triangle would result in less potential for shading of city streets than	No changes, but future developments under existing height/density limits could add to total extent of shading of city	Somewhat greater potential for shading in most intensive portion of Denny Triangle, due to higher heights.

Alternative 1 High End Height and Density	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
- Taller buildings in 1st/Western Ave. vicinity and edge of Belltown would add to shading of city streets. - Additional shading of Downtown SEPA-identified parks not likely to occur due to zoning changes.	- No zone changes in 1st Ave./ Western Ave. vicinity or edge of Belltown would avoid additional shading effects. - Similar to Alternative 1.	- Less intensive zoning in edge of Belltown and 1st Avenue/ Western Ave. vicinities would result in less potential for shading of city streets than Alternatives 1 or 2. - Similar to Alternative 1.	- No changes, but future developments under existing height/density limits could add to shading of city streets. - No changes relative to Downtown SEPA-identified parks, although future development closer to protected parks could possibly trigger the need to use SEPA protections. - No changes	- Potential impacts would be less than Alternative 1, but more than Alts. 2 and 3, given the increase in residential height limit. - Similar to Alternative 1.
The possibility of higher building heights with future development near Denny Park at Denny Way creates slightly greater potential for shading impacts on the park.	No zone changes near Denny Way would avoid additional shading effects on Denny Park.	Changes would not affect zoned height/density near Denny Way, thus avoiding additional shading effects on Denny Park.	No changes	Roughly similar to Alternative 1, given that increased height of buildings offsets the lesser density allowed near Denny Park.
Wind Future new buildings in the office core and some peripheral areas would create the potential for additional wind effects near street level. However, interspersing of new buildings with existing buildings may help protect them from some wind exposure.	Nearly the same as Alternative 1.	Slightly less potential for wind effects than Alternatives 1 or 2.	Slightly less potential for wind effects than Alternatives 1, 2 or 3.	Slightly less than Alternative 1.

Alternative 1 High End Height and Density	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
- The additional bulk and distribution of future development in the Denny Triangle may provide some additional buffering of winds from the north. However, the new buildings at the northern periphery would be exposed to those winds and their effects. ENERGY Impacts - City Light's recent forecast is that a new substation serving Downtown would be needed after 2020. by 2012. Growth rates studied in the EIS are comparable to City Light load growth projections. - Factors that could accelerate growth in electrical loads include: --higher-than-forecasted economic activity; --greater-than-expected high-density loads (such as "server hotels" and biotech research facilities); and --higher "system redundancy" needs. - Potential future development arising from higher zoned height/density limits in the Denny Triangle area east of 8th Avenue could result in	Due to somewhat less height and bulk of future buildings in the Denny Triangle and peripheral areas, potential wind effects would be somewhat less than for Alternative 1.	Somewhat less potential for wind effects than Alternatives 1 or 2.	Slightly less potential for wind effects than Alternatives 1, 2 or 3.	Slightly less than Alternative 1.
	Same as Alternative 1.	Same as Alternative 1.	Same as Alternative 1.	Same as Alternative 1.
	Same as Alternative 1.	Same as Alternative 1.	Same as Alternative 1.	Same as Alternative 1.
	Impacts approximately similar to Alternative 1, except slightly less-intensive zoning changes in portions of Denny	Impacts slightly less than Alternative 1 and 2. Alternative 3's greater residential emphasis in zoning of	Under Alternative 4 (existing zoning), impacts would be nearly the same as for Alternative 1. However,	Differences from Alternative 1 would likely help reduce the potential magnitude of impacts on the

Alternative 1 High End Height and Density	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
capacity limitations more quickly than would otherwise occur, due to increased commercial loads. These limitations and needed improvements will be closely monitored and addressed in City Light's Capacity Plan and updates.	Triangle east of 8 th Avenue could reduce the worst case potential for electrical infrastructure impacts in that area.	the portion of Denny Triangle east of 8 th Avenue would reduce the magnitude of impacts on the electrical system compared to Alternatives 1 and 2.	growth may spread over a few more properties in the Commercial Core, and overall commercial development capacity would approximately 25% less than Alt. 1 (and residential capacity 19% less).	electrical system, due to the maintaining of current commercial densities in some DMC and DOC 2 areas and a greater probability of residential uses in some portions of the DMC zones.
There is considerable potential for additional growth in both Downtown and South Lake Union. City Light is monitoring and addressing the Downtown and South Lake Union system relationships and necessary improvements.	Similar to Alternative 1.	Similar to Alternative 1.	Similar to Alternative 1.	Similar to Alternative 1.
TRANSPORTATION Impacts				
Approximately 1.285 million person trips are projected to have an origin and/or destination in Downtown Seattle on an average weekday in year 2020, 58% greater than today's 815,000 person trips. This reflects the high-end growth forecast used in this EIS.	Same as Alternative 1.	Same as Alternative 1.	Same as Alternative 1.	Same as Alternative 1.
For Alternative 1, volumes across all screenlines are projected to increase by 10.1% in the AM peak and 20.9% in the PM peak hour	For Alternative 2, volumes across all screenlines are projected to increase by 9.3% in the AM peak and 19.7% in	For Alternative 3, volumes across all screenlines are projected to increase by 10.1% in the AM peak	In 2020 Baseline Condition, volumes across all screenlines are projected to increase by 9.4% in the	Comparable to Alts. 1, 2 and 3.

Alternative 1 High End Height and Density (year 2020).	Alternative 2 Concentrated Office Core the PM peak hour.	Alternative 3 Residential Emphasis and 20.4% in the PM peak hour.	Alternative 4 No Action Alternative AM peak hour, and by 19.4% in the PM peak hour.	Preferred Alternative
- At Screenline 8 (NE Denny Triangle), eastbound PM peak hour traffic is projected to be approximately 8% greater than projected for the 2020 Baseline Condition (Alt. 4). - At Screenline 8 (NE Denny Triangle), the predicted PM peak hour volume-to-capacity (v/c) ratio would reach 1.20 by 2020. A v/c ratio of 1.20 is the City's maximum arterial level of service standard. - Other screenlines' v/c ratios for the 2020 PM peak hour include: --approx. 0.80-0.84 in both directions on Avenues near Seneca St.; --approx. 0.90 for eastbound traffic near 9th Ave in Denny Triangle; --approx. 0.93 for eastbound traffic near 6th Ave in the Commercial Core. - In the studied corridors of Denny Way, Stewart St., Olive Way and Howell St., 13 of 38 intersections in the AM peak hour are projected to	- At Screenline 8, eastbound PM peak hour traffic is projected to be approximately 1.3% greater than the 2020 Baseline Condition (Alt. 4). - Predicted v/c ratio of 1.13 by 2020, 0.07 less than predicted for Alternative 1. - Nearly the same as Alt. 1. - Nearly the same as Alt. 1. - Nearly the same as Alt. 1. - In the studied corridors, 8 of 38 intersections in the AM peak hour are projected to experience operating conditions at	- At Screenline 8, eastbound PM peak hour traffic is projected to be approximately 2.3% greater than the 2020 Baseline Condition (Alt. 4). - Predicted v/c ratio of 1.12 by 2020, 0.08 less than predicted for Alternative 1. - Nearly the same as Alt. 1. - Nearly the same as Alt. 1. - Nearly the same as Alt. 1. - In the studied corridors, 8 of 38 intersections in the AM peak hour are projected to experience operating conditions at	- At Screenline 8, eastbound PM peak hour traffic is projected to be approximately 4.1% greater than <i>existing conditions</i>. - Predicted v/c ratio of 1.11 by 2020, 0.09 less than predicted for Alternative 1. - Nearly the same as Alt. 1. - Nearly the same as Alt. 1. - Nearly the same as Alt. 1. - In the studied corridors, 10 of 38 intersections in the AM peak hour are projected to experience operating	- At Screenline 8, the estimated effect is between 2% and 8% greater than the 2020 Baseline Condition, based on comparison to Alts. 1 and 3. - At Screenline 8, the estimated effect on v/c ratio is between 1.12 and 1.20 by 2020, based on comparison to Alts. 1 and 3. - Nearly the same as Alt. 1. - Nearly the same as Alt. 1. - Nearly the same as Alt. 1. - In the studied corridors, the estimated effect is likely to be between 8 and 13 intersections

Alternative 1 High End Height and Density experience operating conditions at LOS E or F.	Alternative 2 Concentrated Office Core LOS E or F.	Alternative 3 Residential Emphasis LOS E or F.	Alternative 4 No Action Alternative conditions at LOS E or F. This would be 8 more than under existing conditions.	Preferred Alternative operating at LOS E or F in the AM peak hour, based on comparisons to Alts. 1 and 3.
In the studied corridors, 19 of 38 intersections in the PM peak hour are projected to experience operating conditions at LOS E or worse.	In the studied corridors, 19 of 38 intersections in the PM peak hour are projected to experience operating conditions at LOS E or worse.	In the studied corridors, 22 of 38 intersections in the PM peak hour are projected to experience operating conditions at LOS E or worse.	In the studied corridors, 17 of 38 intersections in the PM peak hour are projected to experience operating conditions at LOS E or worse. This would be 12 more than under existing conditions.	In the studied corridors, the estimated effect is likely to be between 19 and 22 intersections operating at LOS E or F in the PM peak hour, based on comparisons to Alts. 1 and 3.
Travel Times: For the 2020 PM peak hour, westbound Stewart St. would be approximately 6 minutes slower than the 2020 Baseline Condition. However, travel times would be 3 minutes faster westbound on Denny Way and one minute faster eastbound on Olive Way.	For the 2020 PM peak hour, westbound Stewart St. travel time would be slightly faster than the 2020 Baseline Condition. Travel times would also be 5 minutes faster westbound on Denny Way and 2 minutes faster eastbound on Olive Way.	For the 2020 PM peak hour, westbound Stewart St. travel time would be approximately 3 minutes slower than the 2020 Baseline Condition. Also, travel times would be 3 minutes faster westbound Denny Way and approximately one minute slower eastbound on Olive Way.	For the 2020 Baseline Condition PM peak hour, westbound Stewart Street travel time would be approximately 9 minutes slower than existing conditions. Also, travel times would be nearly 14 minutes slower westbound on Denny Way, and 2 minutes slower eastbound on Olive Way.	Likely comparable to the range between Alts. 1 and 3.
Transit Service: --North of Seneca Street screenline: Similar to the 2020 Baseline Condition (Alt. 4).	-- North of Seneca Street screenline: Similar to the 2020 Baseline Condition (Alt. 4).	-- North of Seneca Street screenline: Similar to the 2020 Baseline Condition (Alt. 4).	-- North of Seneca St. screenline: Nearly the same level of delay in the AM peak hour as existing conditions. Modest increase in transit delay could occur, on 2nd, 3rd and	--Similar to Alternative 1.

Alternative 1 High End Height and Density	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative 4 th Avenues.	Preferred Alternative
--Olive/Stewart corridors: The cumulative amount of travel time spent by transit vehicles in these corridors would increase by 10% and 24% in the AM and PM peak hours, respectively. --Denny Way screenline: Similar (2% less) to the 2020 Baseline Condition (Alt. 4). • Transit Layover: Slightly less impact than the 2020 Baseline Condition (Alt. 4). Potentially, 5 existing layover locations displaced.	--Olive/Stewart corridors: The cumulative amount of travel time spent by transit vehicles in these corridors would decrease by 1% and 15% in the AM and PM peak hours, respectively. --Denny Way screenline: Transit delay notably greater (21%) than the 2020 Baseline Condition (Alt. 4). • Slightly less impact than the 2020 Baseline Condition (Alt. 4). Potentially, 5 existing layover locations displaced	--Olive/Stewart corridors: The cumulative amount of travel time spent by transit vehicles in these corridors would decrease by 4% in the AM peak but increase by 25% in the PM peak hours. --Denny Way screenline: Sum of AM & PM peak hour transit delay approximately the same as Baseline Condition. However, this occurs with a 28% (18-minute) improvement in the AM peak hour and 18% (20-minute) degradation, compared to the 2020 Baseline Condition (Alt. 4). • Similar impact to the 2020 Baseline Condition (Alt. 4). Potentially, 10 existing layover locations displaced.	--Olive/Stewart corridors: The cumulative transit travel time in these corridors would increase by 40% in the AM peak and 45% in the PM peak hour, compared to existing conditions. --Denny Way screenline: Total minutes of transit delay projected to increase by 34 minutes (115%) in the AM peak hour and 68 minutes (168%) in the PM peak hour, compared to existing conditions. • Worst-case transit layover impact: future development by 2020 could displace 10 existing Metro layover locations.	--Olive/Stewart corridors: Likely comparable to the range between Alternatives 1 and 3. --Denny Way screenline: Difficult to predict the effects of the Preferred Alternative due to the variation in findings for Alts. 1, 2 and 3 • Similar to Alts. 3 and 4. This Alternative includes an idea for a bonus or flexibility related to the provision of transit layover space on-site.

Alternative 1 High End Height and Density	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
• Queuing (lane back-up) problems are predicted at several locations, mostly similar to the 2020 Baseline Condition. However, fewer queuing impacts on Olive Way for the eastbound PM peak, compared to the 2020 Baseline.	• PM peak hour impacts would be generally similar to the Baseline Condition, but with fewer queuing impacts on Olive Way than Alternative 1 or the Baseline Condition.	• PM peak hour impacts would be generally similar to the Baseline Condition, except conditions would be slightly worse along Stewart Street and somewhat improved along Denny Way, Olive Way and Howell Street.	• Queuing problems for some traffic movements would occur at a greater majority of intersections along Stewart, Denny Way and Olive Way, compared to <i>existing conditions</i>.	• Likely comparable to the range between Alts. 1 and 3.
PARKING Impacts • Future residential and employment growth would increase overall parking demand, for approximately 19,500 to 23,750 spaces, depending upon the amount of commuters that choose to use transit rather than automobiles. • An estimated supply of approximately 17,005 off-street parking spaces would be provided with future development.	• Nearly the same as Alternative 1. • Nearly the same as Alternative 1.	• Slightly less than Alternative 1. • Slightly less than Alternative 1.	• Slightly more than Alternative 1. • Nearly the same as Alternative 1.	• Similar to Alternative 1. • Similar to Alternative 1, assuming that, even with elimination of commercial parking requirement, private developers will continue to provide parking in their projects at an amount similar to what is currently required.
• Approximately 7,137 existing off-street parking spaces would be displaced by	• Same as Alternative 1.	• Approximately 180 more spaces displaced than Alt. 1.	• Approximately 410 more spaces displaced than Alt. 1.	• Similar to Alternative 1.

Alternative 1 High End Height and Density development through 2020, largely in the Denny Triangle and edge of Belltown.	Alternative 2 Concentrated Office Core	Alternative 3 Residential Emphasis	Alternative 4 No Action Alternative	Preferred Alternative
• Competition for on-street parking spaces would likely increase, especially in the areas of concentrated future development.	• Same as Alternative 1.	• Slightly more probable impact than Alternative 1.	• Somewhat greater impact than Alternative 1.	• Similar to Alternative 1.
WATER UTILITY Impacts • An additional 6.3 to 7.1 million gallons per day of water demand if full buildout was achieved, a 24-25% increase over buildout of existing zoning. Less than 1 percent of total city water demand.	• An additional 5.7 to 6.4 million gallons per day of water demand if full buildout was achieved, a 12-13% increase over buildout of existing zoning. Approximately 0.5 percent of total city water demand.	• An additional 5.4 to 6.0 million gallons per day of water demand if full buildout was achieved, a 6% increase over buildout of existing zoning. Approximately 0.25 percent of total city water demand.	• An additional 5.4 to 6.0 million gallons per day of water demand if full buildout was achieved.	• Similar to Alternative 1.
• No significant adverse infrastructure capacity impacts identified. Two existing minor deficiencies relating to fire flows can be corrected over time.	• Less potential for adverse impacts than Alternative 1.	• Less potential for adverse impacts than Alternative 1.	• No impacts identified.	• Similar to Alternative 1.
• The typical location of water meters within public rights-of-way makes accessibility and repair costly and difficult.	• Same as Alternative 1	• Same as Alternative 1.	• Same as Alternative 1.	• Same as Alternative 1.
SEWER & STORMWATER UTILITIES Impacts • Future development could occur in a denser manner	• Similar to Alt. 1, with slightly greater sewage	• Similar to Alt. 1, with slightly greater sewage	• Similar to Alt. 1, with slightly lesser sewage	• Similar to Alternative 1.

Alternative 1 High End Height and Density and generate more total sanitary sewage volume than development under current zoning.	Alternative 2 Concentrated Office Core volumes in the Denny Triangle.	Alternative 3 Residential Emphasis volumes in the Denny Triangle.	Alternative 4 No Action Alternative volumes in the Denny Triangle.	Preferred Alternative
By 2020, peak sanitary sewage flows in the Denny Triangle would be approximately 3,750 gallons per minute.	By 2020, peak sanitary sewage flows in the Denny Triangle would be approximately 3,822 gallons per minute, 1.5% greater than Alt. 1.	By 2020, peak sanitary sewage flows in the Denny Triangle would be approximately 3,805 gallons per minute, 1.5% greater than Alt. 1.	By 2020, peak sanitary sewage flows in the Denny Triangle would be approximately 3,616 gallons per minute, 3.6% less than Alt. 1.	Similar to Alternative 1.
Better stormwater controls required with future development would reduce peak stormwater volumes, thus helping to avoid or minimize the risk of overflows during major storm events.	Similar to Alt. 1.	Similar to Alt. 1.	Improvements will occur even under the No Action Alternative.	Similar to Alternative 1.
No significant adverse sewer/ drainage infrastructure or capacity impacts identified.	Similar to Alt. 1.	Similar to Alt. 1.	No impacts identified.	Similar to Alternative 1.
Worst-case additional sewage volume from full buildout would represent approximately 0.75 percent of treatment plant annual average daily flow.	Worst-case additional sewage volume from full buildout would represent less than 0.5 percent of treatment plant annual average daily flow.	Worst-case additional sewage volume from full buildout would represent less than 0.2 percent of treatment plant annual average daily flow.	No additional impacts from this No Action Alternative.	Similar to Alternative 1.

Significant Unavoidable Adverse Impacts

Population and Employment

No significant unavoidable adverse impacts are identified for any of the alternatives. Over the long term, the alternatives could have differing impacts on the number and composition of Downtown households and Downtown employees, but none of these impacts are identified as significant unavoidable adverse impacts.

Housing

Under all alternatives, large public and private subsidies would be required to meet ambitious targets for housing preservation and production. If these subsidies are not available, some buildings currently providing affordable housing may be lost and other potential housing opportunities may not be created.

In spite of the number of programs currently available to assist households earning less than 30% median annual income with housing, some households with employees in new Downtown Seattle office buildings and hotels would have difficulty finding affordable housing to meet their needs in King County. They would need to live in overcrowded conditions, pay more than 30% of their income for rent, or commute from lower-priced housing outside of King County. Those few households not able or willing to make these choices could potentially become homeless.

The TDC program would be eliminated under Alternative 1 and the Preferred Alternative. The TDC program would no longer be available to projects in some portions of the Denny Triangle DOC2 zone under Alternatives 2 and 3. However, under the Preferred Alternative, increased heights for residential use in the Denny Triangle should help offset losses in residential capacity due to elimination of the TDC program, especially in those areas where height for commercial uses remains the same.

Land Use

Under all alternatives, if forecasted development occurs, land uses in the study area would be significantly transformed by the increased density of residential and commercial development. This transformation is interpreted to be consistent with the City's Comprehensive Plan and neighborhood plans for the study area, and is not interpreted to be a significant unavoidable adverse impact.

Similar to existing conditions, some City of Seattle landmarks, some existing housing and some buildings containing human service uses might be demolished. This could occur under any of the alternatives, including the No Action Alternative, and is not interpreted to be a significant unavoidable adverse impact.

Urban Design: Height, Bulk and Scale

Additional height and bulk enabled by proposed zoning changes would add incrementally to the scale of development, resulting in greater differences from the development authorized by existing zoning. This increase in the scale and intensity of development would have the greatest impact in the Denny Triangle and transition areas between separating Downtown commercial zones and from less intensive residential and mixed-use neighborhoods.

Urban Design: Streetscape and Pedestrian Amenity

Under all the alternatives, future development will reduce solar access to the pedestrian environment and increase the physical enclosure of the street level environment.

Urban Design: Parks and Open Space

Under all the alternatives, the per capita amount of public open space available for use by Downtown residents and employees will diminish.

Views and Aesthetics

Additional height and bulk enabled by proposed zoning changes would add incrementally to the potential future impairment or blockage of views from some areas, predominantly portions of the Capitol Hill (south of Denny Way), Pike/Pine and First Hill neighborhoods.

Climate—Shadows and Wind

None are identified.

Transportation

Without mitigation, future development through the year 2020 would generate additional traffic volumes and increase congestion in portions of Downtown, most notably in the Denny Triangle area. Much of this impact would occur with or without zoning changes. However, if Alternative 1, ~~or~~ Alternative 3 or the Preferred Alternative is implemented, congestion in the northeastern Denny Triangle could be approximately 5-10 percent worse than under the other alternatives, including the 2020 baseline condition (Alternative 4 - No Action). Under all the alternatives considered, additional congestion will likely increase overall travel times on Denny Way, Stewart Street and Olive Way, including transit travel time. Implementation of mitigation strategies, at the City's discretion, would likely improve overall transportation conditions, so that a portion of the impacts of traffic congestion could be avoided.

Parking

Additional development over the long term would contribute to increased commuter vehicle trips to and from the Downtown study area, and increased parking demand.

Energy

With implementation of recommended mitigation strategies, significant unavoidable adverse energy impacts are unlikely to occur.

Water Utility

None identified.

Sewer and Stormwater Utilities

None identified.

Mitigation Strategies

A range of possible mitigation strategies for key topics analyzed in this EIS is summarized below. Most of these mitigation strategies are not considered mandatory actions that must be taken if any of the alternatives are chosen. However, the City should consider implementing several strategies to avoid or reduce negative consequences that may occur over time with future development Downtown, as identified in this EIS.

Land Use

- **Residential Character.** Rezones of some areas to promote residential uses could encourage the type of residential character envisioned in some of the Downtown neighborhood plans.
- **Human Services.** A variety of measures are proposed that would encourage the retention of existing buildings currently housing human service agencies and the development of new space for human service agencies, including the development of a human services bonus or TDR program.
- **Historic Preservation.** The City currently has a number of programs in place to help preserve City Landmarks. The City could take a number of measures to direct those resources in ways that would help protect the most threatened structures, such as increasing priority for using incentives in commercial development that contribute most directly to landmark preservation.

Housing

- **Funding for Low-Income Housing.** The City could undertake a number of different measures to increase the amount of floor area that would be subject to the low-income housing bonus program, including increasing the maximum floor area limit, or applying the program to DMC zones. Under the Preferred Alternative, the low-income housing bonus program that applies in DOC 1 and DOC 2 zones is extended to DMC zones proposed for increases in the maximum commercial density (FAR). Furthermore, in the Preferred Alternative, residential projects developing to the proposed maximum bulk and height limits would, for the first time, contribute to affordable housing resources.
- **Capacity for residential development.** A number of changes to Downtown's zoning scheme are identified, to ensure that housing remains a viable component of development Downtown after twenty years. Under the Preferred Alternative, in almost all zones, heights are increased for residential use, and provisions like the transfer of commercial density from housing sites in DMC areas also contribute to increased residential capacity.
- **Housing for larger households.** Potential strategies are defined to encourage the development of housing for families with children and other larger households. These include: incentives for units with multiple bedrooms, design review guidelines focused on designing open spaces to meet the needs of families with children, and the development of Downtown facilities for children.

Urban Design

- **Height, Bulk and Scale.** A variety of strategies for addressing bulk issues are identified, including: restrictions on alley vacations; better coordination between height and density limits to ensure desired building forms; density limits and/or additional bulk controls on residential use; special bulk controls in sensitive transition areas and/or areas where more residential character is desired; and provisions conditioning height increases to achieve desired development conditions.
- **Pedestrian and Streetscape Amenities.** Strategies for improving pedestrian circulation and street-scape conditions are identified (refer to the Draft EIS), especially for areas expected to experience substantial growth.

- **Parks and Open Space.** Potential mitigation strategies include funding key open space improvements by: pooling open space contributions generated through requirements and incentives for individual projects; adding provisions to increase the participation of commercial and residential development in addressing increased demand for public open space; and providing public investments in open space with priorities placed on areas where substantial growth is anticipated.

Views and Aesthetics

Potential mitigation strategies range from:

- exempting the Downtown area and vicinity from consideration of view impacts as currently directed under SEPA; to
- preparing a comprehensive view protection strategy that would identify critical views and the protective measures to be employed.

Transportation and Parking

Potential mitigation strategies include the following (Appendix B of this Final EIS includes additional discussion of some of these strategies):

DEMAND REDUCTION STRATEGIES

- **Transportation Demand Management (TDM) Strategies.** Continue and strengthen the use of TDM strategies. The City and other public agencies should continue to promote (and require as possible) greater implementation of TDM strategies, coordinated through worksites. The following TDM strategies should be promoted:
 - ◆ Discounted transit passes (e.g., Flex Pass)
 - ◆ Promotion of other alternative modes (walking, biking)
 - ◆ Increased telecommuting
 - ◆ Business use of vans
 - ◆ Carsharing
 - ◆ Preferential parking for carpools/vanpools
 - ◆ Guaranteed ride home
 - ◆ Enhanced computerized ridematching database and mapping services
 - ◆ Parking cashout (discontinuing parking subsidies and providing incentives for alternative modes)
 - ◆ Enhanced real-time transit information via Internet and on-street kiosks.
 - ◆ FlexCar and residential-based bus pass incentives.
- **Transportation Management Association (TMA).** The City should promote formation of a TMA by Downtown stakeholders to aid in future TDM planning activities.
- **Area-specific rezones.** The City could pursue area-specific rezones to reduce trip generation.
- **Encourage development of residential and retail uses.** Height and density changes that promote the development of residential units and retail space in Downtown neighborhoods help mitigate the transportation impacts of future development. By locating residences near employment, much of the demand for automobile and transit trips to work is met by walking (or other modes) instead. According to the 2000 Census, approximately 35-40% of the workers who live in or near Downtown Seattle walk to work. Non-work trips would also be more likely to occur via walking or other modes if there is a variety of land uses serving Downtown residents. This is especially likely in dense urban

neighborhoods where parking is scarce. Promoting residential and retail uses help mitigate the transportation impacts that are projected to occur under all scenarios.

MITIGATION FUNDING STRATEGIES

- **Transportation mitigation program for Downtown.** The City should develop a comprehensive approach to defining transportation mitigation requirements for projects in Downtown or portions of Downtown. A transportation mitigation program could include defining a set of improvements to address significant adverse impacts, and a mechanism by which new development and redevelopment would contribute a fair share toward transportation system improvements. These improvements could address impacts to all mode choices, including roads, transit facilities, bicycle, pedestrian and ride-sharing programs. A transportation mitigation program could provide more certainty and clarity for Downtown property owners and developers, and greater certainty that significant transportation impacts would be remedied over the long term.
- **Explore new mechanisms to expand transit service.** Downtown Seattle is projected to gain many new jobs by 2020 regardless of changes to height and density regulations. This growth will require significant investment in new transportation capacity. Relying solely on adding roadway capacity and parking facilities as mitigation will become increasingly expensive and impractical. Exploring new mechanisms to allow use of mitigation funds to expand transit service might prove to be more effective than traditional mitigation strategies, especially in Denny Triangle. Public-private partnerships could be used to leverage developer contributions to fund transit service. Reliance on single-occupant-vehicles imposes costs on developers of building parking garages. Investing in transit instead would allow developers to avoid these costs while also supporting public goals of less reliance on automobiles and more pedestrian-friendly neighborhoods. Increasing transit access to buildings would also make them more attractive to tenants. Partnerships should create incentives that encourage participation of most or all of the property owners within transportation services zone. All property owners within the zone would benefit from public and private investments in transportation services oriented to the zone.

MOBILITY STRATEGIES

- **Define physical improvement options that would enhance the capacity of the transportation network.** A comprehensive set of physical improvement options or specific improvement projects could be identified, and related to a transportation mitigation program. This could include previously-identified capital improvement projects, new capital improvements and/or changes (such as lane restriping or designation changes) that would make better use of existing rights-of-way. It could also include projects needing additional right-of-way, such as adding travel lanes or turn lanes to streets, and/or pedestrian/bicycle-oriented improvements, transit facilities, and improvements such as grade-separation of selected intersections. Lane modifications could also include changes to better accommodate transit vehicles and reduce transit delay. The Transportation section of Chapter 3 discusses options for Stewart Street, Howell Street, Olive Way and Denny Way.
- **Curb lane management.** Locate loading zones in alleys or on side streets, and locate access drives (preferably right-in and right-out only) on side streets rather than key arterials. Consider time-of-day restrictions on use of loading zones and pick-up/drop-off zones to avoid peak hour conflicts
- **Retiming traffic signals to optimize corridor traffic flow.** This is a long-term operational strategy best implemented within the context of the entire Downtown street network, and on an ongoing periodic basis as actual changes in traffic volumes and patterns are experienced. More funding would allow more frequent updates to signal timing to better meet changing demands and travel patterns.

- **Funding for additional staffing of the City's Traffic Management Center.** More funding would allow the City to increase staffing and better utilize the capabilities of its traffic management center, including providing quicker signal timing responses to incidents, special events or other fluctuations in day-to-day traffic flows.

PARKING STRATEGIES

Other possible mitigation strategies that could be pursued:

- **Financial mechanisms.** Influence parking demand through financial mechanisms, such as taxes or other user fees.
- **Reduce parking requirements.** Lower the minimum and maximum parking requirements in Downtown, to encourage transit and carpool modes and discourage single-occupant-vehicle commuting by employees. The Preferred Alternative proposes to eliminate the minimum commercial parking requirements, while maintaining current maximum limits.
- **Area-specific rezones.** The City could reduce potential parking demand and trip generation through area-specific rezones.

Energy

To mitigate identified impacts, a combination of mitigation strategies should be selected from the following range of possible strategies, or other strategies not yet identified.

- **Implement recommendations of City Light's Capacity Plan:** Complete City Light's Capacity Plan in 2005 and implement the recommendations that result from that Plan.
- **Strategically address high-energy-demanding uses:** A combined land use and energy strategy could be developed to address impacts of new large loads or staged new large loads in the Downtown.
- **Incorporate LEED into the Downtown Density Bonus program:** Incentives or requirements to use the LEED system's Green Building energy efficiency strategy could promote better energy conservation in future development. In response to the City Council's Resolution 30280, City staff have discussed integration of sustainable building incentives into the building permitting process, and integration of the LEED system into the Downtown density bonus system. The LEED system could be required for participation in the Downtown Density Bonus program as a mitigation strategy to help offset impacts on the electrical system.

A particular threshold of performance in the energy category could be established. Consistent with the City's own internal sustainable building policy, this requirement could be set as a minimum achievement in energy efficiency.

A minimum overall LEED performance could also be set in order to capture other benefits of the program, such as mitigating increased demands on water and wastewater infrastructure, reduction of stormwater impacts, and mitigation of global climate effects. If this was implemented, a development project would go through the certification process administered nationally by the US Green Building Council. A copy of the certification package could be submitted to the City to endorse the required participation in the program. Since LEED certification is not fulfilled until after construction, a strategy would be needed to handle projects that did not meet performance targets when built.

- **Incorporate LEED into Land Use Code, Design Review, or Building Code:** Alternatively, the City could seek to incorporate elements of the LEED system into the Land Use Code, the design review guidelines, and potentially the Building Code. Measures and tools developed as part of LEED would be required or encouraged to be met before a project receives its land use approval. For example, the Downtown design guidelines could be amended to include guidelines on floorplate

design, encouraging designs that would allow natural light to intrude to the center of buildings, potentially reducing the amount of lighting required during the day.

- **More efficient design of buildings' electrical systems:** Developers could be required to design their buildings' electrical services so that their average monthly power factor is no less than 0.97. The present financial penalty for having a power factor below 0.97 could be increased to encourage installation of better equipment and/or power factor correction equipment.
- **Coordination with the building permit process:** DPD and City Light will continue their efforts to work with developers during the pre-application process, before issuing building permits.

Water Utility

In response to an existing shortcoming of development regulations, a potential mitigation strategy is:

- Implement code changes to require future development to locate water meters in on-site spaces (rather than public rights-of-way), to improve accessibility and avoid needless utility maintenance work within public rights-of-way. This would also contribute to better metering of water use and greater cost-effectiveness in the City's utility operations.

Chapter Five

Response to Comments on the Draft EIS

CHAPTER FIVE

RESPONSE TO COMMENTS ON THE DRAFT EIS

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This chapter includes written comment letters that are reproduced beginning on page 5-35, and City staff's responses to identified comments within those letters. The letters include those comments that were received during the official comment period on the Draft EIS. The responses below generally identify the topic of the written comment, and seek to clarify or expand upon the analysis presented in the Draft EIS, for topics relevant to SEPA environmental impacts.

Letter 1

Washington State Department of Community, Trade and Economic Development

1. Thank you for your comments and recommendations for mitigation strategies.
2. Your recommendations to take steps to preserve existing affordable and market rate housing resources and create additional units are noted.
3. Your recommendations regarding open space are noted. Currently, Downtown office developments are required to provide specified amounts of open space for use by building occupants, which can be accommodated on rooftops or in other locations on the project site, or, under special circumstances, as public open space off-site. Additional commercial floor area can also be gained through bonuses for projects providing various types of open space for general public use. Residential development is also required to provide specified amounts of common recreation area for use by building residents. In the Denny Triangle, special provisions allow residential and mixed-use projects to add floor area above current height limits provided that contributions are made to an amenity fund to be used for public open space improvements in the neighborhood.

The amount of additional space anticipated under these requirements given growth projections assumed in this analysis is provided in Appendix J of the Draft EIS. Under the Preferred Alternative, the amount of additional open space anticipated would be most similar to conditions under Alternative 1.

4. Thank you for your comments and recommendations regarding transportation impact mitigation.
5. Thank you for your comments. Please see the response to Letter 2.
6. Thank you for your comments regarding growth management, community preservation and development. Please see Chapters 1 and 2 of this Final EIS for further discussion of alternatives.

Letter 2

Washington State Office of Archaeology & Historic Preservation

1. Thank you for your comments on preservation of historic buildings and properties, and suggested mitigation strategies. Prior to investigation of the alternatives in the Draft EIS, incentives for landmark preservation in the Downtown Code were reviewed, including landmark transfer of development rights (TDR), and the Downtown Bonus and TDR provisions were recently amended to increase the effectiveness of these tools in areas where landmark structures would be most threatened by development pressures. Among the outcomes of these revisions was the creation of a City-sponsored TDR bank that enables the City to purchase and bank TDRs from the owner of a designated landmark structure who may wish to sell them before a private party is available to purchase them for a new project. Furthermore, if landmark TDRs are available in the bank, new projects exceeding certain floor area thresholds would be required to purchase the TDRs to gain a specified amount of the added floor area. While the City does not currently offer specific protections

to undesignated structures, provisions for within-block TDR enable any existing structure to transfer unused development rights to another site within the same block as an incentive to maintain a variable scale of development in an area.

Historic preservation is an important aspect of planning for the future of Downtown. Decisionmaking processes will continue to consider the input of preservation professionals and local preservation entities.

Letter 3

King County Water and Land Resources Division – Daryl Grigsby

1. Your comments regarding the effects of certain alternatives on the Transfer of Development Credits (TDC) program are noted. The information on outstanding funding amounts related to TDC is also acknowledged. Please see Chapters 1 and 2 of this Final EIS for further discussion of alternatives. The discussion of impacts is revised to acknowledge that an additional impact of eliminating the program would be the loss of funds the County and other agencies have earmarked for amenities in the Denny Triangle neighborhood in exchange for participation in the TDC program. Under the Preferred Alternative, the proposed changes in the height limits in the Denny Triangle would result in the termination of the TDC program.
2. Thank you for your comments regarding pending projects considering development rights transfers.

Letter 4

King County Department of Transportation – Metro Transit Division

1. Thank you for your comments. Your comments throughout the letter addressing smart growth and transportation mitigation strategies are noted. It is agreed there is a public interest in managing transportation demand and fostering transit using a variety of strategies. Over the past several years, the Seattle Department of Transportation has developed transportation plans and strategies for the Center City to move more people using transportation modes such as bus, light rail, monorail, ferries, streetcars and bicycle and pedestrian networks within the Center City. A key piece of this work is the Center City Access Strategy which presents multi-modal transportation improvements that accommodate projected growth Downtown and meet the City's Comprehensive Plan goals.
2. In order to provide for a meaningful comparison of impacts among the alternatives, the EIS compared the effects of 20 years worth of growth. For this time period, the differences among the alternatives in terms of population and employment growth are not expected to significantly vary. The real estate consultant report concludes that employment growth will be determined largely by factors other than zoning, related to larger economic trends.
3. The Draft EIS includes assumptions about growth in South Lake Union as part of its analyses for transportation and energy impacts. It also implicitly assumes that employment and residential growth will occur as was projected for growth management and regional traffic analysis purposes at the time of the transportation analysis.
4. Your comments on the extent of the transit study in the EIS are noted. It is acknowledged that several corridors, in addition to Stewart Street and Olive Way, provide significant transit service. The Seattle Department of Transportation (in consultation with Metro King County) is developing a plan for Seattle's future transit network including important transit corridors and transfer points. The plan has identified an "Urban Village Transit Network (UVTN)" that is the backbone of the City's transit

network and will deliver the highest quality transit services in the city. Performance standards are associated with this network.

5. Your comments on the challenges of serving the Denny Triangle with sufficient transit are noted. The Seattle Transit Plan being developed by the Seattle Department of Transportation identifies transit service needs to address future growth projections. The Center City Access Strategy includes a detailed transit network to address the entire Center City area. It is acknowledged that current Metro revenue projections will not be sufficient to meet future transit demand associated with growth projections under all alternatives.
6. Your comments regarding strategic needs for maintaining or improving transit service are noted. It is acknowledged that reducing travel delay for transit, effective routes into/out of the northern CBD and high-capacity transit access are important needs that will require significant resources. In addition to the transit priority options presented on Draft EIS pages 3-191 through 3-193 (for an updated version see the Mitigation Strategies section at the end of Chapter 4 in this Final EIS), Seattle Department of Transportation has developed additional options for mitigating future transit delay. These strategies can be found in the Center City Access Strategy and supporting reports and plans. SDOT will continue to work with King County Metro to develop and implement these measures within the Center City.
7. Thank you for the updated information on layover spaces. Your interest in maintaining effective layover space in the north Downtown area is noted. Layover space is an important street use, and potential incompatibilities should be identified and avoided as possible. To address this issue, the Seattle Department of Transportation and King County Metro have begun a north Downtown Seattle bus layover study to develop interim and long-term plans for managing existing bus layover spaces, for accommodating service growth and future bus layover requirements. The Preferred Alternative requests consideration of an incentive in the Land Use Code for commercial developments that would accommodate layover space on a development site.
8. As part of Downtown Seattle, the Denny Triangle's streets are designated using Downtown's system for pedestrian requirements, amenities and street level uses. Some of the streets in the Denny Triangle have Class I pedestrian requirements, some have Class II requirements, and some are Green Streets with special requirements. The required sidewalk widths range from 12 feet to 18 feet in width. It is possible that pedestrian requirements could be upgraded as part of code changes associated with this proposal. Your suggestions for fostering more pedestrian walkways, thoroughfares and open space are acknowledged.
9. Your suggestions for parking-related strategies, including deleting parking minimums, simplifying parking reduction processes, a transportation mitigation fund, and adjusting current allowable reductions, are noted. The Preferred Alternative would eliminate minimum parking requirements for non-residential uses. No minimum parking requirement currently exists for residential uses. Maximum parking requirements also exist in the zones being considered for zoning changes.
10. Your suggestions for incorporating transportation in height bonuses are noted. The types of public benefits provided through floor area incentives reflect a prioritization resulting from major policy decisions that were based on considerable public input. The most recent Council actions modifying the Bonus and TDR programs have established the provision of low-income affordable housing and child care facilities as the highest priority for use of development incentives in Downtown. Other high priority items include provision of public open space and landmark preservation. The Preferred Alternative does include an addition to the existing transit facilities bonus for transit tunnel station access, to expand it to include access to all fixed-rail systems and for construction of transit layover

facilities. Improved provisions regarding bicycle facilities are also included in the Preferred Alternative. Adding new incentives which could ultimately compete with these other public benefits would require decisionmakers to balance competing policy objectives.

11. Your preferred approach to mitigation strategies, including developers as constructive partners, is noted. Please see the response to comment 9 above, regarding parking regulations. The Preferred Alternative does offer incentives to encourage housing in new development as suggested in your comment. Also, see new text in mitigation strategies for Transportation (under Demand Reduction Strategies) regarding the role of mixed-use development in mitigating transportation impacts from future development. Further discussion of the potential for public-private partnerships is also presented (see the Mitigation Strategies section at the end of Chapter 4 of this Final EIS).
12. Please see Chapters 1, 3 and 4 of this Final EIS for further discussion of the Preferred Alternative and recommended transportation mitigation strategies.
13. Thank you for your comments.

Letter 5 Seattle Planning Commission

1. Figure 1 on page 1-3 of the Draft EIS provides the clearest portrayal of the boundary of the Belltown neighborhood and the study area (shown in three different shading patterns). Differences among the alternatives' development patterns in Figure 17 are hard to spot due to the graphics' small size, but the figure allows for visual comparisons on one page. Figures 18 through 24 provide additional textual and visual information that clarifies differences among the alternatives.
2. Thank you for your comments. None of the studied alternatives are a specific package of zone changes meant to achieve all of the Mayor's objectives. The document was prepared in response to neighborhood plan proposals for accommodating growth targets established for the Downtown area in the city's Comprehensive Plan, adopted in 1994. Decisionmaking processes will determine what changes, if any, occur. However, please see Chapter 1 of this Final EIS for further discussion of a Preferred Alternative.
3. Thank you for your comments on the recommended features of a Preferred Alternative. See Chapter 1 of this Final EIS for further discussion of the recommended alternative for adoption.
4. Your comments on mitigation strategies are noted. The mitigation strategies discussions in each section of Draft EIS Chapter 3 are suitably detailed in describing the options that could be employed to address the identified impacts. For example, see pages 3-102 through 3-105 in the Draft EIS. This level of detail is more than sufficient to meet the SEPA requirements for a non-project EIS. Further, the Preferred Alternative discussed in this Final EIS represents a set of actions that incorporates several of the suggested mitigation strategies.
5. Discussion of the TDC program is provided in Chapter 3 of the Draft EIS, where the relative impacts of the four alternatives on the program are discussed in the Housing (pages 3-18, 19) and Urban Design sections, and in Appendix J, where the dollar value of funds generated for amenities in the area is presented based on projected residential development expected to take advantage of the option for increased height. Established as a pilot program in late 1999, the TDC program is relatively new and was adopted at the beginning of an economic downturn. Consequently, there has been little development activity of any sort to provide a meaningful evaluation of the market's response to the

program. Several projects have, however, explored the use of TDC, three of which have active permit applications, and one of these projects now under construction has increased floor area through the purchase of conservation credits. Further, as part of the interlocal agreement between the City and County, the County has already expended funds for public amenity improvements in the Denny Triangle, and has committed additional resources for amenities once development credits are purchased.

6. Chapter 2 of the Draft EIS (also Chapter 2 in this Final EIS) includes detailed discussion of the background, rationales and approaches for each of the alternatives. The Relationship to Plan and Policies discussion in Chapter 3 of the Draft EIS essentially is a presentation of the pros and cons of the alternatives with respect to the Comprehensive Plan and neighborhood plan goals. Draft EIS Appendix H presents more plan and policy analysis. Further derivation of pros and cons for the sake of decisionmaking would be helpful, but is not necessary in this EIS. Also, it risks overly reducing the numerous complexities within each topic that may make simple pro/con comparisons difficult. Please see Chapters 1 and 2 of this Final EIS for further discussion of the Alternatives, including a Preferred Alternative.
7. This comment touches on several “bigger-picture” topics related to commercial and residential growth. The specific questions suggest that precise analysis is possible on those topics. However, the complex and intertwined nature of the subject matter encourage a more qualitative level of response. Please refer to the Relationship of Plans and Policies discussion in the Draft EIS, page 3-61, and to Appendix H, for further discussion

The comment’s first premise is that this EIS should assess the impact of what happens if the analyzed development does not occur in Downtown Seattle. Strictly speaking, this topic is not within the purview of the EIS, which analyzes the impacts of what happens if the growth does occur in Downtown. More specifically, the analysis explores how different zoning scenarios might differently accommodate 20 years of growth, and impacts related to those differences. The EIS analysis tends to contradict this comment’s underlying assumption that different choices among the alternatives might result in growth shifts away from Downtown to other neighborhoods or regional cities. The real estate consultant’s analysis for this EIS indicates that the contemplated changes in zoned height and density are not expected to alter 20-year growth projections for Downtown.

Identifying and supporting findings of zoning-related impacts such as regional or intracity shifts in projected growth would require much more analysis than is possible within the scope of this EIS, and would likely remain speculative in nature. Please see the responses to comments 8 and 9 of this letter, and discussion in Chapter 3 of this Final EIS.

The analysis indicates that all of the contemplated growth can be accommodated within Downtown through 2020. However, it is interesting to note that the Alternatives do have different implications for the long-term capacity of growth Downtown. Among the alternatives, a range of approximately 26-30 years worth of residential growth could be accommodated, and a range of approximately 37-48 years worth of commercial growth could be accommodated under the zoning studied for the Alternatives. Alternative 1 would result in the greatest level of commercial capacity (48 years) but the least level of residential capacity (26 years). Under the Preferred Alternative in the Final EIS, changes to employment and residential capacity would be expected to fall roughly between those identified in the Draft EIS for Alternatives 1 and 2. The EIS findings on long-term capacity generally suggest that the City should begin to plan for “what happens next” in accommodating Downtown growth after 2020, particularly for residential uses.

The Draft EIS described ranges of possible Downtown residential and employment growth: roughly 11,000 to 17,500 new households and 50,000 to 70,000 new employees by 2020 (see pages 3-6 to 3-8 in the Draft EIS). Supporting the acceptability of those estimates are the use of multiple sources (including Puget Sound Regional Council forecasts), a perspective based on decades of Downtown real estate market trends, and an understanding of the trends affecting residential and employment growth in Downtown. The high end of these ranges should represent an optimistic yet reasonable maximum of potential growth Downtown by 2020. This relatively aggressive growth rate was assumed to ensure that the environmental analysis would be valid in terms of adequately disclosing impacts. It is unlikely that 20-year population or employment trends will dramatically vary from the ranges studied in the EIS, but if employment and household growth occurs in the lower end of the ranges, the impacts on Downtown would be somewhat less than the identified maximum impacts.

Additional requested analysis about housing markets, including markets for family-oriented uses is beyond the scope of this EIS.

8. It is acknowledged that the achievement of population and employment growth projections in Downtown will be influenced by many factors related to macroeconomic trends, demographic trends, real estate market and financial trends, as well as private sector choices about development and public sector choices related to planning, economic development and regulations.
9. The primary implications of the Draft EIS findings relate to the Alternatives' varying impacts on Denny Triangle's future commercial and residential development. Alternative 3, for example, would accommodate more residential development than Alternative 1, providing approximately four years worth of additional residential growth capability if the capacity is fully used. Alternative 3 would also reorient zoning in certain portions of the study area to better encourage that some areas develop as "residential enclaves." On the other hand, zoning choices in Alternative 1 would tend to promote more of a commercial character to the land use pattern of the Denny Triangle, which would more greatly emphasize its role as an employment center. Changes under the Preferred Alternative would most closely approximate Alternative 2.

See the response to comment 7 in this letter regarding growth shifts. The potential that growth may occur in South Lake Union or Northgate should not be assumed as a negative impact on Downtown, or vice-versa. All of the urban centers inside and outside the City have growth targets, and it may take decades for those areas (including Downtown) to reach their full growth potential. Even if studies of growth shifts might be worthwhile, there would be numerous "push" and "pull" factors involved (both are cited in this comment) as well as uncertain implications of macroeconomic factors and private sector decisionmaking factors about development. The net results would inevitably contain a lot of speculation. This sort of study is beyond the scope of this EIS.

Whatever the selected zoning strategy is, Seattle's goals and policies indicate it should not place the Downtown Urban Center in a non-competitive position for growth compared to other areas inside or outside the City. The zoning should be established consistent with those policies so that the intended outcome for future Downtown growth is supported.

With respect to the TDC program, King County indicates that the elimination of the program (which would occur under the Preferred Alternative) could have an appreciable impact on the ability to preserve open space outside the urban center (see the responses to the letter from the King County Water and Land Resources Division for further discussion).

10. The Draft EIS analyses are the best source to rely upon for evaluative discussion of the alternatives' housing impact implications. Two timeframes are considered—20 years of growth (2000 to 2020), and the long-term.

As noted on page 3-19, over 20 years about 45,385 new housing units would need to be built in the region to accommodate new households attracted by new Downtown jobs. An extended forecast based on an ERA economic study suggests a 20-year demand for approximately 17,500 (40%) of these new housing units in Downtown Seattle. To illustrate possible distribution of that growth, the City's Comprehensive Plan growth "planning estimates" suggest that approximately one-half of Downtown's residential growth over 20 years would occur in those neighborhoods that are outside the EIS study area (Pioneer Square, International District and Belltown). The EIS analyses conclude that proposed zoning changes would not alter the projected 20-year demand for commercial or residential uses under any of the alternatives. Therefore, there is no evidence to conclude that 20-year housing demand would be affected within Downtown neighborhoods or that there might be shifts in residential growth or demand.

Over the long-term, prospective residential growth demands could have positive implications for the ability of Pioneer Square, International District and Belltown to achieve additional housing growth. If there is sustained long-term demand for Downtown housing (likely related to Downtown employment growth), increasingly limited availability of sites with residential development capacity is likely to encourage residential development in those neighborhoods outside the EIS study area. Comparatively lower land values in some of those areas would also possibly contribute to that growth trend. It would be logical to assume that lower land values would also attract the interest of non-profits and other affordable housing developers toward further development in those neighborhoods.

For quantitative evaluation, refer to Tables 16 and 17 in the Draft EIS (page 3-18). These show the maximum potential Downtown residential development capacity, including the neighborhood areas within Downtown but outside the EIS study area. Table 17 compares the residential development capacity to the projected number of new households that could be generated by buildout of redevelopable commercial properties Downtown. This illustrates much more potential demand for housing than can be satisfied Downtown, and that neighborhoods including Pioneer Square, International District and Belltown possess a bit more than one-half of the potential residential development capacity Downtown. This information seemingly bodes well for the prospects of demand for future housing development in all parts of Downtown.

11. Regarding the likelihood of housing development occurring in DOC 1 and DOC 2 zones, the analysis in the Draft EIS reflects the real estate consultant's assumptions that property owners in the future will seek to maximize development opportunities for both uses, where possible. While commercial development will likely be the primary choice for development in these zones, in situations where the permitted zoning envelope allows additional development potential beyond what is required to accommodate the maximum permitted density of commercial use, the assumption is that developers will increasingly seek to maximize the value of their sites by including other uses, like housing. Examples include a few hotel/condominium proposals currently in the permitting process.
12. The Draft EIS Housing section already analyzes potential impacts on existing subsidized housing (see page Draft EIS page 3-22, "Potential loss of housing to redevelopment" regarding Alternative 1) and illustrates a range of potential Downtown bonus-based resources generated by 20 years of development (see Table 18 on Draft EIS page 3-21).
13. Regarding edge impacts on housing and smaller scale development in Belltown, in the Chapter 3 *Urban Design -- Height, Bulk and Scale* section, the Draft EIS describes the relative bulk and scale

impacts of the four alternatives on sensitive transition areas, identified on Figure 19, which include the southern and eastern edges of Belltown.

14. Thank you for your comments. Please see Chapters 1, 3 and 4 of this Final EIS for additional discussion of the Preferred Alternative, which is intended to fulfill the height and bulk objectives expressed by the Mayor.
15. The discussion of impacts on historic resources in the Draft EIS includes consideration of structures that are not currently designated as landmarks, in three paragraphs plus an accompanying table. Given the nature of the statements made in those paragraphs and the fact that the information was presented, the Draft EIS did adequately identify and consider those impacts. These structures are listed on page 3-52 of the Draft EIS. See the response to comment 1 in Letter 9 below for a list of 12 other buildings identified by Historic Seattle that are located within the study area.

The sources used to identify these structures include neighborhood plans, where "icon" buildings and "character buildings" of special interest to the community were identified, a survey of buildings in the Denny Triangle conducted as part of The Seattle Commons/South Lake Union Plan Final EIS that identified "buildings or sites likely to meet Landmarks or National Register criteria," and a list by the City of "buildings or sites of community importance that may meet Landmarks or National Register Criteria." Altogether, 21 structures not currently designated as Landmarks were identified by these sources. Impacts of the various alternatives on structures that accommodate affordable housing are addressed under Housing impacts (see Draft EIS pages 3-22 through 3-27).

16. Comments noted. Impacts on the costs of land are outside the scope of environmental impacts required to be reviewed under SEPA. The impacts on "sensitive transition areas," including the Pike Place Market and Belltown are discussed in Chapter 3 of the Draft EIS, under "Urban Design." A specific location in this area at First Avenue and Virginia Street was also modeled to illustrate potential impacts of the different alternatives in this area.
17. The Preferred Alternative presented in this Final EIS would continue to support the concept of transitions due to the arrangement of zones with zones stepping down in intensity toward the edges of Downtown, and mixed commercial zones located between the more intensive core zones and the less intensive residential zones. See Chapters 1, 3 and 4 for additional discussion of the Preferred Alternative.
18. Comments noted. The response to these comments lies in describing the nature of the alternatives, and noting the pertinent Draft EIS impact text and the discussion of mitigation strategies. Alternative 3 in the Draft EIS provided a strategy for better achieving residential environments than would be possible under Alternatives 1, 2 or the No Action Alternative. These latter alternatives would not possess zoning characteristics that would particularly contribute to the achievement of desirable residential areas. The impact analysis on Draft EIS pages 3-90 through 3-98 indicated these comparisons among the alternatives. Other portions of the Height, Bulk and Scale analyses further indicate the physical circumstances that, particularly in the Denny Triangle, would tend to work against street environments desirable for residential development. Subsequently, the Mitigation Strategies section on Draft EIS pages 3-102 through 3-105 provide a variety of strategies that could be adopted for those purposes. It is agreed that the selection of strategies to achieve such goals should be intentional in the way that height, bulk and scale would work, and that design guidelines could be beneficial.

The Preferred Alternative would accommodate residential use particularly in portions of the DMC zone where raising height limits for residential use without increasing commercial density limits, and

a new provision allowing the transfer of commercial development rights from sites committed to the development of housing, may encourage more properties to be developed with residential and mixed-use buildings. The additional height, along with improved controls on building bulk may also encourage slimmer building types. Impacts on light/shadow, sense of enclosure and similar concerns about massing may be addressed during Design Review of individual proposals, and/or could be the subject of mitigation strategies that could be selected by decisionmakers.

19. Because the perception of differences in development scale between the alternatives is minimal from many vantage points, the graphics in the Draft EIS focused on presenting a broader overview to illustrate variations in the impacts of the Alternatives, which most significantly was the number and location of projects rather than differences in their overall size. Within the constraints of budget, the Draft EIS did present street level views and perspectives from nearby viewpoints. This Final EIS, plus other materials likely to be presented to the public and decisionmakers, will contain additional graphic information intended to represent view and aesthetic interests.
20. Assessing impacts of alley vacations at a detailed level in an analysis of this nature is complicated because each case requires special review resulting in specific conditions addressing the particular impacts of a vacation at a particular location. Both the conditions and an individual project's response to them are difficult, if not impossible, to anticipate. The analysis in both the Draft and Final EIS assumes that, consistent with past development practices, under certain conditions, some large sites will be created through alley vacations, influencing the overall scale of development possible. Under various zoning schemes, development of a certain size and configuration will be accommodated on these sites, which will have certain generalized impacts on the surrounding area.
21. The purpose of the Draft EIS was to evaluate the impacts of proposals developed to implement goals and policies established through the Downtown Neighborhood Planning Process. Pages 3-124 and 3-125 of the Draft EIS (as well as some others on pages 3-102 through 3-105) describe a variety of strategies that could aid in shaping pedestrian and open space environments. The specific objectives guiding the development of the Preferred Alternative in the Final EIS are presented in Chapter 1 of this Final EIS. See Chapters 1 and 3 of this Final EIS for additional discussion of how the Preferred Alternative relates to these topics.
22. Comments noted. The Draft EIS on pages 3-124 and 3-125 identifies a variety of possible open space planning strategies, several of which require future research and analysis or are future possible actions unrelated to this proposal. Due to the finding that no mitigation measures are required as mandatory actions for this EIS, it is not necessary to conduct a detailed assessment of these or other innovative open space strategies. While the value of additional research and planning for open space is acknowledged, it is beyond the scope of this EIS to develop measures of open space demand/need, other than the goals currently established in the Comprehensive Plan and the Department of Parks and Recreation's *Complan*.
23. Please see the response comment 5 in this letter.
24. Comment noted. The Urban Design and Views and Aesthetics sections of this EIS comprise a reasonably detailed set of analyses that address the relevance of visual open space and the impacts of the studied alternatives. More detailed analysis of visual open space and effective strategies for better public and private open space is beyond the scope of this EIS, but would be a worthwhile task for future planning. See Chapters 1, 3 and 4 and Appendix C of this Final EIS for additional discussion of the Preferred Alternative. The Preferred Alternative includes strategies for encouraging slimmer buildings and better controlling building bulk. If adopted, this should benefit the streetscape

pedestrian environment, the broader visual scenic environment as experienced at various viewpoints and overall livability of the Downtown environment.

25. Based on updated information from City Light, ongoing capacity planning currently indicates that a new substation serving Downtown would be needed after 2020. City Light's capacity planning will continue in 2005 and be updated over time.
26. Additional detailed assessment of water and sewer system infrastructure needs and funding is beyond the scope of this EIS. The Water Utility and Sewer/Stormwater Utilities sections of the Draft EIS identified only a limited number of utility issues, for which the impacts of the alternatives are likely to be minor. Therefore, additional analysis is not warranted for the purposes of this EIS. However, Seattle Public Utilities continues to explore the long-term needs of its systems.
27. The Department of Planning and Development has compiled 2000 U.S. Census data for the City's Urban Centers and Urban Villages, at www.cityofseattle.gov, including "journey to work" and automobile ownership data. The data confirm expectations that Downtown residents are less likely to own an automobile, are somewhat more likely to use transit, and are much more likely to walk to work than residents in other parts of Seattle. A majority of the households in the Downtown Urban Center did not own an automobile in 2000, and the average vehicles available per household was 0.5. This is similar to the assumption used for the parking analysis of 0.63 vehicles per household that was based on the 1990 U.S. Census. Almost one-quarter of the Downtown households used public transit to commute in 2000, while 36% walked to work. Only about 16% of the Downtown households worked outside the City of Seattle.

These data suggest that Downtown residency enables a considerably greater proportion of residents to avoid using an automobile for commuting to and from work, compared to the rest of Seattle. This helps Downtown residents contribute less per-capita to congestion on the regional transportation network, and represents a more efficient pattern of residential growth than suburban-style growth.

As described in the Draft EIS, the commuting choices of Downtown employees are assumed to be consistent with the Puget Sound Regional Council's "mode share" information in its 2020 travel demand model. This model projects that in 2020 about 33% of Downtown-oriented trips will be made using transit modes, compared to the estimated 20% in current conditions.

28. The precise location of alley vacations is not predicted in this EIS. Impacts of alley vacations are evaluated on a case-by-case basis. Presumably, an alley vacation would not be approved unless conditioned to ensure that the project would not result in significant adverse impacts. If alleys were eliminated, the loading and access functions they provide would need to be provided in other configurations. Depending upon how streets and buildings are designed and the levels of passing traffic, different configurations could contribute to additional congestion on City streets and/or additional potential for conflicts with pedestrians and other vehicles.
29. The current Downtown zoning is restrictive in the treatment of principal-use structured parking. Principal-use garages for long-term parking are prohibited in much of the study area, and are only permitted as conditional uses in the Denny Triangle area and along the edge of Interstate 5. Conditions for approval address impacts on traffic and pedestrian circulation.

The Draft EIS addresses the potential impact on streetscape character of above-grade structured parking accessory to other uses (see discussion of impacts on residential character in Chapter 3 Urban Design – Height, Bulk and Scale and impacts on streetscape and pedestrian amenity in Chapter 3 Urban Design – Pedestrian Amenities and Open Space). The presence of parking is especially an

issue in the DMC zones and for residential development in all zones, in part because the floor area at or above grade that is occupied by parking does not count as chargeable FAR in these instances. Therefore, there is no incentive to minimize the impacts of parking on the streetscape by locating it below-grade where it is exempt from floor area calculations. In the Preferred Alternative, however, long-term commuter parking located at or above grade would count as chargeable floor area in those DMC areas where commercial density limits would be increased. Furthermore, eliminating the minimum parking requirement may reduce the amount of parking provided in future structures.

Where parking is provided at or above street level, it is subject to development standards based on the pedestrian street designation that applies to streets abutting the project site. Parking at street level must be separated from the street by another use along the frontages of streets designated as Class I Pedestrian Streets and Green Streets, and for portions of the frontage of streets designated Class II Pedestrian Streets. On all floors above street level, parking must be screened. In the Preferred Alternative, residential parking provided above grade on larger sites would need to be separated along some portions of the street frontage by another use.

30. Thank you for your comments. Please see Chapters 1, 3 and 4 of this Final EIS for further discussion of the Preferred Alternative.

Letter 6

Belltown Community Council – John Pehrson, John Lombard

1. Thank you for your comments on alternatives for zoning in the studied portion of Belltown, and zoning regulations affecting bulk and scale. Specific provisions in the Preferred Alternative that address the issues related to the bulk of residential structures in Belltown include maximum limits on floor sizes above specified elevations and maximum limits on the width of facades.
2. Thank you for your comments. Please see Chapters 1-4 of this Final EIS for further discussion of alternatives, including the Preferred Alternative in Chapter 1.
3. Thank you for your comments.

Letter 7

Denny Triangle Neighborhood Association

1. Thank you for your comments on the intent of the Denny Triangle Neighborhood Plan.
2. Thank you for your comments on the relationship of this proposal to the 2001 Downtown TDR and Bonus system changes.
3. The recommendations in the Draft EIS for Alternative 1 are taken directly from the Denny Triangle Neighborhood Plan, to the extent that the plan provided specific information. Height increases of 100 feet were recommended throughout the area, and base and maximum FAR increases to 7 and 14 respectively were proposed for the DOC 2 zone. While specific FAR limits were not identified for the DMC zone, the plan indicated that the increases should be similar in relative magnitude to those for DOC 2, so the base FAR was increased from 5 to 7 and the maximum FAR increased from 7 to 10. This assumption is consistent with recommendations made by the Advisory Committee reviewing changes to the bonus and TDR programs that were to be considered in conjunction with recommended height and density increases. While the plan does call for increasing potential for commercial development, it also specifies objectives to “encourage a mix of low, moderate and

market rate affordable housing throughout the neighborhood with project specific mixes of commercial and residential development,” and to “encourage a 'residential enclave' of predominantly residential development along key green streets ...”

4. Analysis of the Draft EIS alternatives suggests that the proportionally higher increase in proposed commercial density relative to height in some zones would not likely remedy concerns about buildings that appear excessively bulky. The Final EIS includes proposals for a relationship between height and density increases and treatment of building bulk that will address this issue.
5. Thank you for your comments on Alternative 2.
6. Thank you for your comments on Alternative 3.
7. Thank you for your comments on the TDC program. In addition to allowing increased height for residential and mixed-use development and providing a mechanism for channeling resources to fund public amenities in the Denny Triangle, the program also resulted in upzoning approximately four acres of land from DMC 240' to DOC 2 300' to accommodate increased employment growth, consistent with Denny Triangle Plan proposals. The TDC program was created as a pilot project, and is scheduled to be reviewed to determine whether it should be extended or terminated in July 30, 2005. Under the Preferred Alternative, the TDC program would be terminated.
8. Thank you for your comments.

Letter 8
Downtown Seattle Association – Kate Joncas

1. Thank you for your comments on the scope of the alternatives and ongoing “Center City” planning topics. This EIS reflects up-to-date consideration of the status and needs of Downtown.
2. Thank you for your comments regarding transportation investments and Downtown as a continuing growth center. The traffic modeling used in the Draft EIS assumed the presence of major transportation improvements (except the proposed streetcar) to accommodate significantly greater transit ridership in the future.
3. The Draft EIS strove to provide a balanced evaluation of impacts on streetscape and pedestrian amenity (see pages 3-112 to 3-114 and 3-119 to 3-121). This included listing several positive impacts that would occur with future development, such as widening of sidewalks, additional Green Street and street tree improvements, and development of continuous street-level uses. Similarly, adverse impacts were carefully described to provide a balanced and accurate depiction of the impacts. Descriptions of differences in building bulk and arrangement among alternatives aid the reader in visualizing the conditions at or near street level, including solar access and relative openness of the physical setting. Also, please see the response to comment 2 of your testimony in the transcript from December 15th, 2003, regarding potential impacts of bulky buildings on street-level environments.

A review of the Draft EIS text reveals that it does not use “worst-case” terminology (or similar wording) in a biased manner with regard to any alternative. The Draft EIS was carefully worded to maintain objective comparisons among the alternatives, because none of the alternatives was treated as a preferred alternative in the Draft EIS.

4. Thank you for your comments. Please see Chapters 1 and 2 of this Final EIS for further discussion of alternatives.

Letter 9 Historic Seattle

1. Thank you for your comments on historic preservation, and the list of buildings with potentially significant historic value. The Draft EIS analysis did consider non-landmark buildings in the analysis (Please see the response to comment 15 in Letter 5 above). Of the 40 structures identified on the list you provided, 12 are located in the study area and not identified in the Draft EIS (Centennial Building, Chamber of Commerce, Diller Hotel/Porter-Davis, Fifth Avenue Court, Foster and Marshall Building, IBM Building, Maritime Building, Norton Building, Rainier Tower, Second and Pike Building, Securities Building, and the YWCA). The Lyon Building was evidently designated as a landmark structure since the list was compiled.
2. Comment noted. Currently, development in DOC 1 and DOC 2 zones can gain the first FAR above the base FAR and 25% of the additional floor area beyond this threshold through landmark TDR. For projects that build to the maximum FAR, this could equate to 35% of the floor area above the base FAR in DOC 1 and 40% of the floor area above the base FAR in DOC 2. Furthermore, the recent TDR amendments enable the City to "bank" development rights from landmark structures, and require projects to purchase landmark TDRs that are available in the bank to gain specified amounts of floor area above the base FAR.

A further protection to designated landmark structures is the existing provision that prohibits projects from altering landmark structures (in ways that exceed base FAR) without Landmark Board approval. Under the Preferred Alternative, raising the maximum FAR limits while retaining the current base FAR limit in DOC 1, DOC 2 and some DMC areas will create the potential for more landmark TDR to be used in future projects. Furthermore, in other DMC areas, landmark TDR remains as an option for increasing floor area above the base FAR while other non-TDR options have been eliminated.

Letter 10 League of Women Voters

1. Thank you for your comments. The Comprehensive Plan has recently been reviewed for 10-year update, and the nearby areas are further included in "Center City" planning work that is considering the functions and interactions of Downtown with its surrounding neighborhoods. Impact review has already occurred or is underway for the cited transportation projects. Rather than make the completion of this EIS contingent upon other extended planning efforts, the preferred course is to complete the EIS review so that the current proposal can be decided upon in a timely manner. The Draft EIS already has provided much evaluation that characterizes the zoning alternatives' relationship to the current Downtown planning and policy framework. The Preferred Alternative advances those specific recommendations considered in the Draft EIS process that are consistent with growth management objectives and will help to achieve goals and policies for Downtown development that were recently reaffirmed through neighborhood planning.
2. Thank you for your comments on zoning and the TDC program. Chapter 2 of this Final EIS describes the context of other zoning- and bonus-related changes that were made over the last several years. Some of the amendments to the Land Use Code in 2001 that implemented neighborhood plan proposals, including the revised bonus and TDR provisions, were adopted with the anticipation that changes to height and density limits would be considered and resolved through the Draft EIS process.

3. All the alternatives are assumed to accommodate the same projected demand for housing in the study area—forecasted to be roughly 7,500 units. Changes to the height and density limits in the different alternatives by themselves are not expected to affect demand. What will be built over the next 20 years or so will be influenced more by demand for commercial space and housing than by the maximum zoning capacity.

What the zoning changes could alter is the ultimate capacity for future residential development. For example, changes that create more zoned development capacity could theoretically accommodate the demand for housing over a longer period—say over a 40-year period rather than the 20-year timeframe examined in the EIS. In the Draft EIS Land Use section, Table 24 compares how the changes under the various alternatives affect residential capacity, which ranges from a low of 8,490 units in an Alternative 4 scenario to a high of 14,595 units in Alternative 3 where recommended zoning changes and use of TDC are assumed.

Another difference between the alternatives that affects housing is the amount of resources generated for affordable housing programs through the bonus and TDR provisions used by commercial development. Given the various ranges between base FAR and maximum FAR limits on commercial density, the alternatives require use of these programs to different degrees. Over 20 years, it is estimated these funds could be leveraged to produce approximately 2,675 subsidized units in Alternative 1, 3,225 units in Alternative 2, 2,775 units in Alternative 3, and 2,025 units in Alternative 1. These units would not necessarily be built in the study area, but would be located within Downtown.

4. Thank you for suggestions to further investigate mitigation strategies for accommodating low-income and affordable housing. The Final EIS and the Preferred Alternative are intended to initiate a broader look at housing conditions in the larger Center City area. Additional mitigation strategies may include extending options to locate housing funded by Downtown programs in adjacent areas outside Downtown where development costs would be less, allowing for more effective use of dollars generated by the housing bonus program. An additional mitigation measure proposed under the Preferred Alternative is a provision allowing greater heights for residential projects opting to contribute to an affordable housing fund. Currently, residential development is not subject to any provisions addressing impacts on affordability.
5. Please see Chapters 1 through 4 of this Final EIS for further discussion of alternatives addressing residential development.
6. Thank you for your comments on height, bulk and impacts on the pedestrian experience. Along with adverse impacts, the Draft EIS noted several positive impacts on streetscape and pedestrian amenity. Please see Chapter 1 of this Final EIS for further discussion of the Preferred Alternative.
7. Thank you for your comments supporting smooth transitions in scale and density between different zones. Please see Chapters 1, 3 and 4 of this Final EIS for further discussion about the Preferred Alternative.
8. Thank you for your comments on parks and open space impacts. Decisionmakers will consider several strategies to mitigate significant adverse impacts on this element of the environment. Following the Final EIS, additional work undertaken in the broader context of the Center City will address strategies for better connections between Downtown and open space resources in adjacent areas.

Letter 11

People for Puget Sound

1. Thank you for your comments on open space impacts.
2. The City's goals for open space in relation to population in the Comprehensive Plan and the Department of Parks and Recreation *Complan* are generally discussed in terms of households. For Urban Centers, including Downtown, the Comprehensive Plan also includes goals for the employment population. Currently, almost 75% of Downtown households are single persons living alone. The average household size in Downtown is 1.34 persons per household. The Draft EIS acknowledges that Downtown currently does not meet open space goals, and will not likely be able to meet them in the future. Certainly, it is unlikely that the amount of open space will double in the next 20 years, given the cost of land and availability of sites. While expanding the supply and quality of public open space resources is a priority, other strategies are also considered, such as:
 - enhancing the public street environment as an urban amenity in Downtown neighborhoods;
 - taking fuller advantage of the perception of openness provided by views out of Downtown; and
 - improving connections to and increasing the use of existing open space resources within Downtown and adjacent areas.
3. Thank you for your comments on stormwater impacts. The SEPA review process predicates the need for impact mitigation on the presence of significant adverse impacts that are attributable to the proposal. This EIS concludes that there would be no such significant adverse impacts on stormwater and therefore no mitigation is necessary. Future development would be required to provide stormwater control facilities meeting regulatory requirements. Those regulations require facilities that have substantive benefits in water quality and quantity control, particularly when compared to uncontrolled runoff from impervious surfaces that are present at many of the future development sites. While features such as green roofs, infiltration and porous pavement would provide benefits, their inclusion is not specifically warranted as stormwater impact mitigation by the findings of this EIS.

Letter 12

1,000 Friends of Washington

1. Thank you for your comments.
2. Thank you for your comments on housing impacts. Please see Chapter 1 of this Final EIS regarding how the Preferred Alternative responds to housing objectives.
3. Thank you for your comments on pedestrian, bulk and scale impacts. Decisionmakers will consider a range of strategies to address potential adverse impacts.
4. Thank you for your comments on traffic impacts and the need for transportation mitigation. Refer to Chapter 4 in this Final EIS for additional mitigation strategies that clarify transit-oriented mitigation funding methods and the role of housing in aiding transportation mitigation.
5. Thank you for your comments supporting reductions in minimum and maximum parking requirements as a mitigation strategy.

6. Thank you for your comments on open space impacts and suggested mitigation strategies. Decisionmakers will consider several strategies to address potential adverse impacts. Current requirements for residential and office developments to provide open space or common recreation area for the use of project occupants, and incentives to provide public open space features similar to those you identify would be retained in all alternatives.

Letter 13
Michael Baker

1. Thank you for your comments. It is agreed that context is important to the discussion of the alternative height and density arrangements that are possible within Downtown Seattle. Perhaps most importantly, this includes the physical, political, legal, historical and regional contexts affecting Downtown. Comparisons to other cities' experiences could be helpful as well. Effective visualization of the relative amounts of change is also of interest. Please see Chapters 1, 3 and 4 of this Final EIS for further discussion of the Preferred Alternative.
2. Thank you for your comments. Inevitably, in publicly discussing complex zoning and policy issues, a level of precision is lost while an opportunity for the public to voice their opinions, interests and concerns is gained. Often, the opportunity to discuss precise quantitative data is limited in public meetings. Additional public meetings will occur as DPD moves forward with "Center City" planning efforts. Please review the Draft and Final EIS for additional information that illustrates the alternatives and their implications in quantitative and qualitative terms.
3. Your comments touch on some of the pertinent interests to be considered by decisionmakers, summarized as: what are the purposes and projected outcomes of regulatory changes, and how would those fit in with growth management policies and the public interest? The Draft EIS should be considered in the context of the larger planning effort that it serves. Primarily, the EIS is a tool for evaluating proposals that were developed as part of an extensive neighborhood planning process. While summarized in the document, much of the rationale upon which the recommendations are based is discussed more fully in the plans themselves.
4. The Draft EIS extensively analyzed components of the "built environment" that are the most important aspects of the environment in highly-developed Downtown. The elements related to the natural environment—Water, Earth, Air Quality, Plants and Animals among others—were considered for review during "scoping" of the document, but eliminated due to lack of probable significant adverse impacts in the Downtown study area. Given the complexity of the subject matter, it may be difficult for the reader to interpret the relative level of impacts, but in general that is determined by comparing the impacts of the alternatives to Alternative 4, which is a "No Action" alternative (e.g., what would happen if the existing zoning continued over the next 20 years). See Chapter 4 of this Final EIS for an impact summary table comparing the alternatives.
5. Thank you for your comments on urban character issues. This EIS is one aspect of the City's ongoing planning efforts that seek to make the best policy and regulatory choices to guide Seattle's growth. Please see Chapters 1 through 4 of this Final EIS for further discussion of alternatives.

Letter 14
Marshall N. Brown

1. Thank you for your comments. Please note that the study area does not include South Lake Union or lower Queen Anne, and includes only the portion of the Denny Regrade (Belltown) that is nearest the Downtown Commercial Core.

Letter 15
Jonathan Dubman

1. Thank you for your comments. You touch on several of the interrelated topics relevant to possible zoning changes—including the function of height limits and transitions, building bulk, views, Downtown housing, growth management, transportation and historic preservation.

Letter 16
Robert F. Hintz

1. The Draft EIS included analysis in Chapter 3 and Appendix H of the relationship to Comprehensive Plan policies. The analysis does not identify any Comprehensive Plan goals or policies that need to be modified in order for the zone change alternatives to occur. This suggests that even with such changes, the Downtown zoning system would remain consistent with the current goals and policies of the Comprehensive Plan.

Letter 17
Douglas Howe

1. In the Draft EIS, Alternative 1 assumed an increase in the base FAR for the DOC2-300 zone from 5 to 6, but not an increase from 5 to 7 in the DMC zone. Chapter 1 of the Final EIS includes discussion that clarifies the rationale for the changes proposed in the Preferred Alternative.
2. Thank you for your comments on Alternative 2. Your summary mischaracterizes the text at page 2-15. In reference to the DMC zones peripheral to the office core, Chapter 2 of the Draft EIS notes, "...where it is desirable to balance residential and employment growth and maintain a gradual transition between the concentrated development intensity in the office core zones and surrounding neighborhoods..." It does not indicate that commercial development should be discouraged in favor of residential development. The Draft EIS Chapter 2 characterization of the Downtown Mixed Commercial zone reflects an interpretation that the "Mixed Commercial" zone should accommodate a mixture of residential and commercial uses and should provide transition to less dense surrounding areas.
3. Thank you for your comments on Alternative 3. Please see Chapters 1 and 2 of this Final EIS for further discussion of alternatives.
4. Thank you for your comments on the Transfer of Development Credits (TDC) program. Notwithstanding value judgments about the worth of the TDC program, the alternatives' varying effects on the operability of the TDC program represent an adverse impact on a current land use regulatory program. Please see the text of Letter 3 from the King County Water and Land Resources Division.

5. Thank you for your comments on urban design and height/bulk/scale. It is agreed that good building design is an essential need. Flexibility for better tower design is part of the rationale for increasing height limits. This would address the criticism that recent projects' bulk were caused by too-constraining height limits in the Land Use Code. Even though these projects were subject to Design Review, the constrained height limits still encouraged bulkier floor plates to achieve the maximum permitted density. The Draft EIS found that with the proportions of added height and density in some of the alternatives, the same issue of bulky appearance would not be resolved. The Preferred Alternative provides a new choice that will provide more flexibility in height to achieve better building forms that will have more aesthetically pleasing distribution of bulk.

Letter 18
William Justen

1. Thank you for your comments on Alternative 1 and the need for increased density Downtown. Please see Chapter 1 of this Final EIS for discussion of the Preferred Alternative.
2. Thank you for your comments on Downtown residential growth as a form of traffic mitigation. As discussed in response to comments of the Seattle Planning Commission, U.S. Census data from 2000 indicate relatively low automobile ownership by Downtown residents and a considerably higher rate of walking to/from work than residents in other areas of the city. The EIS analyses reflect an understanding of that phenomenon. Refer to Chapter 4 of this Final EIS for an additional mitigation strategy that clarifies the role of residential growth in aiding transportation mitigation.
3. The analysis in the Draft EIS does not dispute the beneficial effects of Downtown housing with regard to transportation. However, the magnitude of this impact needs to be considered in light of the overall composition of Downtown's household and employment population. In 2000, there were 11,361 households compared to 174,528 jobs Downtown, and increases in employment continue to outpace housing growth. The more relevant issue may be the relationship between actions that increase future employment growth Downtown (such as proposals for increasing commercial density limits) and efforts to increase the supply of housing. Please see Chapter 1 of this Final EIS for a discussion of the Preferred Alternative's approach to actions that would promote both residential and employment growth, to maximize the benefits of a mixed-use development pattern, including the transportation benefits cited in your letter.

The off-street parking analysis does not exaggerate future parking demand, because it appropriately calculates residential and employment-related parking demands. The residential parking demand was based on 1990 U.S. Census-based automobile ownership rates that are relatively consistent with 2000 U.S. Census data. The employment-related parking demand accurately embodied regional mode share projections that account for the entire spectrum of transportation choices made by all areas throughout the region, including Downtown. In other words, it takes into account the travel behavior of Downtown residents and employees.

4. Proposals for increasing commercial density limits were based on an assumption that additional development capacity would be needed to accommodate potential job growth Downtown. For analysis purposes, the Draft EIS assumed a relatively ambitious rate of growth to provide a sufficient assessment of the potential impacts that could occur over 20 years under different growth scenarios. The Draft EIS did conclude that the zoning under all alternatives, including existing conditions, could accommodate even an ambitious rate of growth that might occur over 20 years.

As is demonstrated in the Draft EIS analysis, increasing height and density limits does not necessarily ensure the maximum generation of revenue for housing through the bonus programs. If growth levels are significantly below those anticipated and demand for office space is low, it is possible that projects would not be built to the permitted maximum FAR limit, which under some scenarios allows projects over 1,000,000 square feet on full-block sites. Under such circumstances, and coupled with proposals for increases to the base FAR limit, the use of housing bonuses may actually be less.

5. Your comments endorsing Downtown high-rise housing development as an amenity that could help attract additional office development are noted. Regarding the desirability of encouraging high-density high-rise residential towers, the Preferred Alternative in this Final EIS focuses on identifying the conditions that will optimally attract residential development, including locations and the relative intensity of commercial development allowed in the area. Please see Chapter 1 of this Final EIS for more information.
6. If so little office development is anticipated in the future, such significant increases in commercial development densities throughout the study area would seem unwarranted. Such a scenario raises the concern that residential development would be less likely to occur in areas where property owners might be more inclined to hold onto property in anticipation of accommodating high-density commercial development at some point in the distant future. The Preferred Alternative seeks to provide a balance by increasing opportunities for the highest-density commercial development in the areas that are clearly best suited to that use, and accommodating residential development in other areas while not precluding employment growth in those areas.
7. Depending on the location, height limit increases of 50% may actually be less than those proposed in some alternatives. For example, in Alternative 1, heights are proposed to be increased by 100 feet throughout the Denny Triangle, which is more than a 50% increase in areas where current limits are 125 feet and 160 feet. If the intent for the increases is to encourage taller and more slender residential towers, height limits above 600 feet may be unnecessary. As a comparison, in Vancouver, B.C., a city often cited for successfully achieving this building type, the maximum height limits generally range between 320 to 450 feet.
8. Thank you for your comments on the "planned community development" (PCD) process. The minimum site size of a PCD is currently 55,000 square feet in DOC 1 and 100,000 square feet in other Downtown areas where it is permitted. The purpose of establishing the PCD process was to allow added flexibility for major development on large sites or areas of Downtown to accommodate projects providing major public benefits, such as significant public open space, and to coordinate development over a larger area to enhance benefits beyond what might otherwise be achieved. These benefits might include a wider range of uses in the area, accommodating a needed public facility, providing for a better massing of development to achieve specific urban form objectives, preserving landmark structures, etc. At a little over one-third the area of a typical square block, a site of 20,000-25,000 square feet would likely be insufficient in size to accommodate the type of tradeoff between flexibility and public benefit intended. As an alternative that would better address flexibility for certain situations, changes to combined lot provisions could be considered.
9. Thank you for your comments on preferring to let the market determine the balance between employment and residential growth. If the public is to consider making substantial public investment in residential infrastructure in some Downtown areas, it may be desirable to have the assurance provided by certain land use regulations that enough housing to warrant the investment will actually occur in the area.
10. Thank you for your comments.

Letter 19
Alan Kurimura

1. Thank you for your comments.

Letter 20
Jack McCullough, letter #1

1. Thank you for your comments. Chapter 2 of the Draft EIS and portions of Chapter 3 characterized the relationship of the alternatives to the applicable neighborhood plans. The maximum height and density increases specified in these neighborhood plans were incorporated into Alternative 1. Please see Chapter 1 of this Final EIS regarding the Preferred Alternative.
2. Thank you for your comments on upper level setbacks and the need for design flexibility. Increases to the height limits are proposed, in part, to provide more flexibility for the massing of structures. The Preferred Alternative also proposes maximum floor sizes for high-rise residential structures and limits on façade widths as a simpler approach for addressing the bulk of development.
3. Downtown Seattle, already the largest employment center in the region, makes sense as a primary focus of the cited transit systems. It is not clear that funding for such systems will have been ill-spent if no zoning changes occur. Downtown's growth targets reflect the presence of these transit improvements. Providing additional capacity for growth in Downtown could aid in reinforcing the value of such transit systems.
4. Thank you for your comments. Please refer to neighborhood plan-related discussion in Chapter 2 of this Final EIS.
5. Thank you for your comment on the impacts of Alternative 3 and buffers. This comment mischaracterizes the findings of the EIS with respect to jobs. The Draft EIS at page 3-11 indicated that if all redevelopable sites in the Urban Center were built out over the next 40 to 50 years, Alternative 1 would accommodate approximately 33,000 more employees than Alternative 3. This translates to approximately 48 years of future employment growth capacity under Alternative 1 compared to approximately 38 years of employment growth capacity under Alternative 3. This illustrates the range of potential long-term differences in zoned capacity under the studied alternatives. Please see the response to comment #21 in this letter regarding transitions (or "buffers") in DMC zones.

It should be pointed out that the Downtown neighborhood plans also emphasize accommodating substantial increases in the Downtown housing supply, with a goal for adding over 15,000 units by 2014. This goal far exceeds the number of housing units likely to be funded through the commercial incentive programs, estimated to be between 2,025 and 3,225 units depending upon the alternative. Meeting this goal will require substantially more opportunities for accommodating housing development than can be produced through incentives for commercial development.

6. Thank you for your comments on the topic of "mandatory mixed-use" buildings under Alternative 3. The provision proposed in Alternative 3 makes mixed-use "mandatory" only in the sense that projects opting to develop above the base FAR would be required to include residential use on the site. Commercial development in the DMR/C zone under Alternative 3 would be permitted to build up to the base FAR of 5 without housing.

7. Thank you for your comments on the cost of slender residential buildings. Please see Chapter 1 of this Final EIS regarding recommended provisions to encourage slender buildings. Also, please see the response to comment 3 in Letter 8 (Downtown Seattle Association) regarding the pedestrian environment. Decisionmakers will need to provide a balance, weighing actions that could potentially increase building cost against measures to ensure the quality and livability of the urban environment.
8. Your comments on market-related perspectives about growth, development costs, and the need for incentivizing strategies rather than restrictive mitigation strategies are noted. Estimates of potential diversion of growth to other neighborhoods or jurisdictions are speculative and difficult to evaluate meaningfully (see the response to comment 9 below, and the responses to comments 7-9 in Letter 5 from the Seattle Planning Commission).
9. Your perspectives about growth, comparative costs of development and related project decisionmaking cited in this comment are noted. However, as reinforced by the findings of a real estate consultant study, the Draft EIS notes that *"the number of employees Downtown will instead be driven by economic forces larger than the Downtown real estate market. Factors such as the regional and international growth industries most likely to seek Downtown office space, interest rates, the availability of funding for new development projects, and the regional transportation network are more likely to influence the amount of new Downtown office development than zoning changes."* The economic cycles in this region and their evident effect on "boom-bust" development cycles demonstrate these influences on development trends.

At the level of 20-year growth projections for a large area, it is reasonable to assume a certain level of residential and employment growth and study its effects among four alternatives. This is particularly helpful in order to gauge the comparative impacts among the alternatives for several elements of the environment. Estimations of potential differences in total amounts of growth over 20 years based on shades of differences in zone regulations would be rather speculative, and might obscure comparisons of impacts among the alternatives. Considering that Alternatives 1, 2 and 3 consist primarily of increases in allowable height and density (in Alternative 3 only for the DOC 1 and DOC 2 zones), these alternatives should increase the attractiveness of Downtown for development rather than decrease it. (Also see the response to comment 20 in this letter.)

It should also be noted that the objectives of the proposals evaluated in the Draft EIS are not solely focused on promoting employment growth Downtown. They also emphasize creating conditions conducive to housing development. The various alternatives explore different approaches for balancing how both job and housing growth can be accommodated.

10. Thank you for your comments on the TDC program. Notwithstanding value judgments about the worth of the TDC program, the alternatives' varying effects on the operability of the TDC program represent an adverse impact on a current land use regulatory program. Refer to Letter 3 from the King County Water and Land Resources Division. The program has already resulted in the expenditure and commitment of funds by King County for public amenities in the Denny Triangle, as well as an interlocal agreement committing the County to include significant public open space as part of the redevelopment of a major property holding, Convention Place Station, in the area.
11. The EIS does not base its assessment of housing impacts in Chapter 3 on the premise of a 1-for-1 jobs-housing balance. The cited discussion is located on pages 1-7 and 1-8 of the Draft EIS under the heading of "Major Issues to be Resolved." The discussion poses policy questions rather than certainties on the topic of priorities for employment and residential growth. The discussion does not promote a 1-for-1 job/housing balance. Rather, it poses two possible policy choices: one that would

“expand Downtown’s role as employment center,” and the other that would “promote a balance between both employment and housing growth.” Under this latter point, the discussion notes the presence of housing as well as employment growth targets for Downtown, and the possible need to ensure sufficient housing capacity. In reality, these are not “either/or” propositions, and “balance” should be interpreted as only a relative term.

12. The EIS does not assume a premise that “Downtown workers should live Downtown.” With regard to low-income housing, this comment mischaracterizes findings on page 3-23 of the Draft EIS. The text identifies that under Alternative 2 a greater proportion of employee households (*of all incomes*) could theoretically find housing Downtown if all development capacity was used, and that this reflects “*a decrease in the number of potential Downtown workers and an increase in the number of potential housing units.*” Therefore, the Draft EIS already provides the clarification this comment requests. On the same page (3-23) of the Draft EIS, it is noted that under Alternative 2, “*more resources could be available to meet demand for housing for the lowest-income households than under Alternative 1. New office and hotel projects contributing to the Downtown Bonus program would provide funds that could leverage other public and private funds to create housing to serve these populations.*”
13. This comment mischaracterizes the nature of the analysis on page 3-18 and 3-20 of the Draft EIS. The reference on page 3-18 compares the number of households generated by Downtown commercial employment at maximum commercial buildout to the maximum number of housing units at maximum residential buildout in Downtown. This illustrates that future Downtown commercial growth is likely to generate much more demand for housing than able to be satisfied within Downtown under any of the alternatives.

This comment narrowly defines Downtown as only an employment center, whereas City policy also defines a residential housing role for Downtown (refer to Draft EIS Tables 8 and 9, pages 3-6 and 3-7). The fact is that a certain proportion of households that work Downtown will prefer to live Downtown, and some proportion of those households might not be able to locate suitably priced housing in Downtown, now and in the future. The fact of demand for housing Downtown (as witnessed in Belltown and other neighborhoods) does not reflect an assumption that “employees in an urban center should live in that urban center.” Creating opportunities for Downtown workers to live Downtown is regarded as a positive aspect that, ultimately, could help alleviate transportation impacts related to work commute trips.

14. This comment assumes that mixed-use projects are limited to projects that include both residential and commercial uses in the same structure. Several built or proposed mixed-use developments in Seattle include housing and commercial uses in separate structures. The consultant’s analysis concluded that over time, developers would seek to maximize return on properties by full utilization of the development potential for both commercial and residential use on a site. This conclusion is applicable to all of the studied alternatives, not just Alternative 3. Refer to Draft EIS Appendix G for modeled project data.
15. For all alternatives, the assumption was that development would be built to the maximum density limits, and the amount of funding generated for affordable housing was based on what proportion of the floor area above the base FAR would be gained through the housing bonus program. The consultant indicated this was a reasonable outcome under all scenarios. The fact that a major office project currently under construction is being built to the existing maximum FAR without the benefit of height and density increases and fully participating in the housing bonus program lends support to the validity of this assumption. The cited differences in base FAR definition among the alternatives were intentional, as part of the analytic process.

The approach employed in the Draft EIS analysis does include comparisons that are based on a consistent set of assumptions. If it were necessary to suggest that Alternative 3 “overstates” housing production because the need to use more bonus area makes a project more costly (another assumption), it would be equally important to suggest that Alternative 1 overstates the situation. This is because it assumes all projects will build to the proposed higher maximum FARs, which one could argue may not be the case if the cost of the bonus was considered unreasonable relative to the expected return for the project.

16. The housing mitigation strategies (page 3-28 of the Draft EIS) address measures to increase funding for affordable subsidized housing through the bonus program for commercial development, as well as measures for enhancing conditions for market-rate housing production.
 - For affordable subsidized housing through the bonus program, no proposals would require a reduction in proposed development densities. The additional use of bonuses would be achieved by maximizing the use of housing bonuses for gaining additional floor area above the base FAR, which could include maintaining the base FARs at current levels while allowing increases in the maximum FARs.
 - To increase opportunities for market-rate residential development, one strategy identified is to rezone areas for primarily residential use, which would result in reduced commercial densities. There are no instances where commercial development densities are recommended to be reduced below current levels and use of the housing bonus increased.
17. Thank you for your comment on exploring family-oriented amenities and schools as an incentive.
18. Your perspectives about growth, comparative costs of development and related decision-making are noted. This comment overstates the assumptions made for the analysis. It may also overstate the portability of commercial demand and development choices within the region. Certain affinities to Downtown locations exist for certain business sectors (for example, law offices attracted by proximity to courts). Also, this comment discounts the increases built into the action alternatives. Given that Alternatives 1, 2 and 3 consist primarily of increases in permissible height and density (in Alternatives 2 and 3 only for the DOC 1 and DOC 2 zones), they should conceptually increase the attractiveness of Downtown for development rather than decrease it. Please see the responses to comments 8, 9 and 20 in this letter for additional discussion, and refer to Chapter 1 of this Final EIS for description of the Preferred Alternative.
19. Your comments on bonus costs affecting maximization of density are noted. However, it appears they conflict with neighborhood plans' rationales for increasing density. Increasing the supply of subsidized housing was one of the primary justifications for height and density increases. Not utilizing the full density would reduce the financial resources generated for affordable housing, resulting in fewer subsidized units.
20. This comment assumes that some of the alternatives to significantly increase height and density Downtown would generate “dislocation” of Downtown development to other Seattle neighborhoods or cities in the region. Given other commentary in this letter, this is likely directed at Alternatives 2 and 3, in which fewer areas of Downtown would be increased in height and density than in Alternative 1. An underlying assumption of this comment is that anything less than the maximum zoning change will generate impacts. However, the normal orientation of SEPA review is to evaluate impacts by comparing to the No Action Alternative, which is Alternative 4. Using this approach, all of the other alternatives would represent significant increases in permissible height and density, which should increase the attractiveness of Downtown for development rather than decrease it.

Therefore, potential “dislocation” of development to other areas based on differences in zoning is not a supported finding, nor is it an impact of the alternatives.

Further, the regional growth strategy promoted through GMA calls for the creation of other employment centers and continued investments to improve transit access to these areas. As the region continues to grow and the job base increases, it is unreasonable to assume that Downtown will continue to maintain the same percentage of regional employment growth as it has in the past. The efforts of the GMA are to ensure that most growth occurs in the already urbanized area of the region, within designated centers like Downtown where it can be best accommodated.

21. The Downtown Urban Center Plan was adopted in 1999 and the goals and policies for the Downtown Urban Center are now included in the Neighborhood Planning Element of the Comprehensive Plan. These goal and policies were largely drawn from the Downtown Land Use and Transportation Plan, originally adopted in 1985, which was reviewed and reaffirmed through the neighborhood planning process. The concept of providing for transitions in Downtown areas appears in several policies in the Comprehensive Plan, including those related to establishing height and density limits, and the intent of specific zones.

In particular, the Downtown Mixed Commercial (DMC) zone is described as suitable for areas “*that provide a transition in the level of activity and scale of development.*” (DT-LUP4). DT-UDP4 states that height limits are regulated to “*provide transition to the edges of Downtown to complement the physical form, features and landmarks of the areas adjacent to Downtown.*” In DT-UDP5, transition is specifically identified as a criterion for determining appropriate height limits, with the direction to “*generally taper height limits from an apex in the office core toward the perimeter of Downtown, to provide transitions to the waterfront and neighborhoods adjacent to Downtown.*” While what constitutes an appropriate transition is debatable, providing a transition between high-density Downtown areas and less-intensive adjacent neighborhoods is still a legitimate matter. The Draft EIS Figure 19 entitled “sensitive transition areas” identifies how the current zoning and height limits have been defined to accommodate transition between the study area and adjacent neighborhoods.

22. The City’s SEPA Ordinance discusses Height, Bulk and Scale impacts at SMC 25.05.675G. The policy background text indicates “*The purpose of the City’s adopted land use regulations is to provide for smooth transition between industrial, commercial, and residential areas, to preserve the character of individual city neighborhoods and to reinforce natural topography by controlling the height, bulk and scale of development.*” Further, “*However, the City’s land use regulations cannot anticipate or address all substantial adverse impacts resulting from incongruous height, bulk and scale...Similarly, the mapping of the City’s zoning designations cannot always provide a reasonable transition in height, bulk and scale between development in adjacent zones.*” These observations and policies supporting compatibility of height, bulk and scale provide a foundation for discussing impacts in the Draft EIS. Your comment on the Design Review process and impact mitigation is noted. However, Design Review only applies to the existing zoning context. It does not address situations where changes to height and density are being considered that would introduce a different scale of development within an area.
23. Nine alley vacations have been approved in Downtown over the last 10 years, including the IDX Tower site, 700 Olive, Stewart Place and Grand Hyatt/Washington State Convention Center expansion. Given that bulk is controlled through a floor area ratio in Downtown, and the total amount of floor area allowed is determined by site size, vacating alleys to create large full-block sites does allow a much larger scale of development to be introduced into an area than would otherwise occur if public rights-of-way were maintained in public use. One of the arguments for increasing building

height limits has been to allow more design flexibility to correct the bulky appearance of recent projects like the IDX Tower and 700 Olive, both of which were granted alley vacations.

The alley vacation review process allows a range of impacts and public benefits to be considered, and a final decision to achieve a high priority public benefit, such as the preservation of a landmark structure, may allow for a tradeoff permitting a bulkier-appearing building. While there are potential positive benefits that can be achieved through the approval process for alley vacations, there may be limits to how extensively issues of building bulk can be addressed if the height limits and density limits are established based on a development pattern set by the existing platting of private parcels and public rights-of-way. There may also be limits if the relationship between the height limits and the density limits is such that design flexibility is severely constrained for a maximized development (in terms of floor area) on a large site created by the alley vacation.

24. Your comments on the need for incentives to promote the development of slender residential buildings are noted. As noted with other descriptions of bulk characteristics, "slender" is a relative term. The zoning for much of Belltown includes development standards to limit the bulk of residential towers, making them more slender than some high-rises built in other Downtown zones that are not subject to these standards. These regulations limiting tower size have not prevented these buildings from being built within the current height limits of 240 feet. What constitutes "slender" towers will need to be defined, as well as how best to achieve them in a manner that makes development economically feasible. See Chapters 1, 3 and 4 of this Final EIS for further discussion of the Preferred Alternative.
25. Your comments on the difficulties of requiring limited floorplates for slender office buildings and the potential effect on development decisions are noted.
26. Your opposition to extending DMR development standards to other Downtown areas as mitigation is noted.
27. Your comments on the mitigation strategy of converting residential floor area to chargeable FAR are noted. Legitimate concerns about the potential bulk of residential buildings have been raised by City staff and the public, because these structures are not subject to the same controls as other permitted uses. The condition could potentially be exacerbated in situations where development sites "max out" permitted commercial densities, then add residential use to increase overall project floor area and bulk. If the maximum density limits expressed in the commercial FAR and height limits imply a certain predictability regarding the potential scale of Downtown development in a particular area, future projects that substantially exceed these limits due to floor area exemptions may result in unanticipated impacts. Downtown plans and policies seek to promote residential development, but not at all costs; there are also policies addressing desirable conditions to promote livability and a high-quality physical environment that need to be taken into consideration.
28. Your comments on the mitigation strategy of overlays for transition areas are noted. Please see the response to comment 21 above regarding the background and policy basis for "sensitive transition areas."
29. Under existing provisions, (SMC 23.49.011A2a), street-level retail sales and service or entertainment uses continue to be bonusable features in certain mapped locations allowing floor area increases for the first FAR above the base FAR in DOC 1 and DOC 2 zones. In DMC zones, the option to bonus this space is still available at mapped locations. Elsewhere, the fact that the space occupied by certain street level uses, including retail, is exempt from floor area calculations is in effect a bonus that is not available to development in zones outside of Downtown. When the retail bonus was

initially established, it was at a time when providing street level uses was regarded as a financial risk for a project. As Downtown continues to evolve as a dense, pedestrian-oriented environment, providing such uses will become less risky and may no longer warrant a public bonus, especially in light of the desire to support higher-priority public benefits. It should also be noted that residential projects within Downtown, and all developments in Pioneer Square and the International District, provide street-level uses without the benefit of a bonus.

30. The Downtown Code states in Section 23.49.011.A1f. *“Except as otherwise provided in this subsection A2f, not less than five (5) percent of all floor area above the base FAR to be gained on any lot, excluding any floor area gained under subsection A2a or A2c of this Section, shall be gained through the transfer of Landmark TDR, to the extent Landmark TDR is available. Landmark TDR shall be considered ‘available’ only to the extent that, at the time of the Master Use Permit, application to gain the additional floor area, the City of Seattle is offering Landmark TDR for sale, at a price per square foot no greater than the total bonus contribution under Section 23.49.012 for a project using the cash option for both housing and child care facilities.”* Currently, the City has not acquired any Landmark TDR that would be subject to the provision cited above.
31. As described in the responses to comments 5 and 20 of this letter, the suggested job “dislocation” or dispersal impacts are not identified impacts of any Alternative. Further, the suggestion that 30,000 jobs would need to be accommodated in Seattle neighborhoods or other cities as a result of selecting a particular alternative is based on an erroneous interpretation of the findings.
32. Thank you for your comments on eliminating minimum parking requirements but not parking ceilings. To promote greater transit use, the Preferred Alternative proposes elimination of the commercial parking requirement, while maintaining the maximum limits on the amount of parking that can be provided.
33. The parking analysis indicates that future development would likely provide considerably more parking than the amount lost from existing parking facilities, including short-term parking, assuming existing types of parking requirements continue, or developers would choose to provide parking at amounts currently required to meet tenant demand. The alternatives do not include restrictions that would hinder market-driven provision of parking supply.
34. The suggested analyses of project costs brought about by a potential LEED requirement (a sustainable design approach) and its relationship to regional competitiveness in attracting new development are beyond the scope of this EIS. Any potential cost analysis would need to carefully specify what timeframe and context would be assumed. Sustainable design advocates generally conclude that the LEED approach results in net benefits with regard to long-term cost performance of buildings, including with regard to their occupants.

Letter 21
Jack McCullough, letter #2

1. Thank you for submitting the extensive list of potential code changes intended as a menu of options, as well as their supporting goals and assumptions.
2. Your recommendations for enhancing the Design Review process via design departures are noted.
3. Your recommendation for eliminating or simplifying upper level setbacks and coverage limitations is noted. See Chapter 1 of this Final EIS for discussion of the Preferred Alternative.

4. Your recommendation for modifying “access-to-parking” standards is noted. Current provisions seek to direct loading activities off alleys and locate vehicular access to on-site parking to locations with the least impact on pedestrian circulation.
5. Your recommendations for providing transitions in scale are noted. One concern about provisions that address an issue like transition is that they provide a high degree of predictability. Provisions that introduce flexibility that may result in unintended consequences could be counterproductive.
6. Your recommendation for allowing more transfer and “stacking” of floor area is noted. Concerns about the relationship between the maximum densities allowed and the height needed to accommodate permitted floor area are important to address. Height limits even as high as 700 feet may not be adequate to accommodate development that can be as dense as 20 FAR, and allowed to become denser through the additional stacking of floor area from nearby sites.
7. Your recommendations for greater flexibility to achieve slender residential towers are noted. With proposed height limits as high as 700 feet, there may not be a strong incentive to develop a slender tower in order to go even higher. In Vancouver, B.C., a city often cited for successfully achieving taller, slender residential towers, the typical height for such towers is 320 feet, with 450 feet allowed in some areas. See Chapter 1 of this Final EIS for discussion of the Preferred Alternative.
8. Your recommendation for easing Energy Code requirements is noted. However, the Washington State Energy Code requirements for residential buildings are established by the RCW as both a maximum and a minimum. The City of Seattle does not have the authority to make modifications to these requirements (DPD, 2004).
9. Your recommendations for providing more residential- and family-oriented amenity bonuses are noted. Currently, the bonuses are limited for use by commercial developments. The bonus provides an incentive of added floor area for projects incorporating features or participating in programs that are intended to mitigate the impacts resulting from increased employment densities. While there may be a logical extension to include features that benefit Downtown residents, since some percentage of them are likely work in these new developments, it may be more direct and defensible to look to residential development to contribute, either through incentives or requirements, to features used by the residential population. See Chapter 1 of this Final EIS for discussion of the Preferred Alternative.
10. Your recommendation for easing other construction code requirements is noted.
11. Your recommendations for open space bonusing are noted. Current provisions allow bonuses for open space provided off-site, and also allow the open space requirement for an office project to be met by providing public open space at an off-site location. The TDC program in the Denny Triangle allows contributions to an amenity fund to generate resources for open space acquisition. Provisions for open space TDR also allow floor area increases for projects that purchase development rights from sites that are to be improved as public open space. Difficulties potentially hindering use of these incentives include lack of available sites and the need to coordinate with multiple development projects to gain sufficient resources for open space acquisition and improvements. For any single project, the expense is likely too great relative to the bonus gained.
12. Your recommendation for restoring and enhancing the retail bonus is noted. Please see the response to comment 29 in Letter 20 above.

13. Your recommendation for providing a “free” additional 2 FAR for additions to existing development is noted. However, many of these projects, including the one cited, were built under earlier Codes, when the base FAR was as high as 10, so have benefited from relatively more “free” FAR than projects built more recently. Also, with certain uses exempt from FAR calculations, like housing and street-level retail, there are opportunities to accommodate additional development without the need to use bonuses.
14. Your recommendation to eliminate SEPA transportation mitigation authority in Downtown is noted. The planned public transit system improvements, transportation management plans (TMPs) and parking limitations will provide significant assistance in addressing Downtown congestion impacts. However, it is not necessary or advisable for the City to eliminate mitigation authority, as elimination of authority would not in itself improve any impact condition. This approach would negate the potential for SEPA authority to be used in a coordinated, positive fashion to achieve targeted physical improvements to Downtown's street network. See Chapter 4 of this Final EIS for the summary of transportation mitigation strategies put forward for consideration by decisionmakers.
15. Your recommendation to consider additional increases in density (20 FAR in DOC1, 16 FAR in DOC 2 and 13 FAR in DMC) is noted. The Draft EIS alternatives included the specific increases that were proposed in the various Downtown neighborhood plans. See Chapter 1 of this Final EIS for discussion of the Preferred Alternative.
16. Your recommendation for linking density increases to proximity to rail transit is noted. However, the suggested proximity of four blocks from rail transit would encompass most of the Downtown area. It has been the intent of Downtown zoning to reflect the accessibility to transit in establishing the maximum allowable densities in an area.
17. Your recommendation for eliminating minimum parking requirements is noted.
18. Your recommendation for restoring the short-term parking bonus is noted. Short-term parking remains a bonusable item under current regulations. Providing short-term parking within a mapped area abutting the retail core can be used to increase floor area in a project for the first FAR above the base FAR (see SMC 23.49.011A2a). However, the bonus for short-term parking is based on providing additional parking in excess of the amount otherwise required, and the elimination of the minimum parking requirement in the Preferred Alternative makes it more difficult to distinguish the public benefit provided by this incentive if it is used only to satisfy the demand for short-term parking generated by the project itself.
19. Your recommendation for increasing the allowable maximum distance for off-site parking in Downtown is noted.
20. Your recommendation for allowing housing TDRs to be generated from sites outside Downtown is noted. Downtown neighborhood plans have emphasized a desire to focus the benefits of Downtown development incentive programs on Downtown neighborhoods. In addressing issues like this, consideration also needs to be given to the zoning where housing resources outside of Downtown are located. Since the transfer involves unused commercial development potential, many structures outside of Downtown are located in zones with little or no allowances for commercial use. Further, cheaper land values outside of Downtown may make available TDRs from these locations more attractive than more costly TDRs from housing structures in Downtown neighborhoods, where housing resources are more likely to be threatened by greater pressures for commercial development. In any case, proposals that potentially contribute to an oversupply of available TDRs can also weaken the program.

21. Your recommendation to allow the housing bonus value to float is noted. To some degree, it is unlikely that development will occur until demand has reached the point that rents rise to the levels that were used to initially establish the value.
22. Your recommendations regarding the Planned Community Development tool are noted. Please see the response to comment 8 in Letter 20 above. Because of the significant variations in development densities that can occur on portions of a PCD area, and the need to establish a clear public benefit to sanction the extra flexibility, it is not likely that this would be approved at the administrative level.
23. Your recommendations for increasing the flexibility for using TDRs are noted. See Chapter 1 of this Final EIS for discussion of the Preferred Alternative.
24. Regarding two half-blocks between Pine and Union, these blocks, located in the retail core (DRC) zone, were not included in the Draft EIS study area, but now have been included in the Final EIS study area (refer to analysis in Chapter 4).

Letter 22
Steve Mooney

1. Thank you for your comments.

Letter 23
Tony Puma

1. Thank you for your comments. Please see Chapter 1 for further discussion of the Preferred Alternative.
2. Thank you for the suggested strategy regarding slender towers and rooftop open space.

Letter 24
Greg Smith

1. Thank you for your comments on possible height bonuses and other provisions for residential buildings. Please see Chapter 1 of this Final EIS for further discussion of the Preferred Alternative, which addresses these topics in various ways. Please note that within the study area, residential towers with floor sizes of 15,000 square feet or less are not currently subject to upper-level development standards. Also, proposals that increase the supply of TDRs may contribute to an oversupply and diminish the effectiveness of the program to address the most critical priorities for its use, including the protection of existing affordable housing structures, landmark buildings and the provision of new public open space resources.
2. See response to comment 24 in Letter 21 above.
3. Thank you for your comments recommending broader Center City planning. Other city planning efforts are underway to evaluate possible changes in the southern portion of Downtown, including Pioneer Square, Chinatown/I.D. and adjacent areas. Please see Chapter 1 of this Final EIS for further discussion of the Preferred Alternative.

Letter 25
John Smith

1. Thank you for your comments.

Letter 26
Scott Species

1. The Draft EIS predominantly consists of cumulative impact analysis, wherein the overall effects of growth over 20 years are compared under different zoning scenarios, including the No Action Alternative. This approach helps identify the overall net impacts of different zoning compared to retaining the existing zoning. The example in this comment pertains more closely to construction-level impacts that are too speculative to identify at this level of SEPA review.
2. The prospect of studying Air Quality was reviewed during scoping for this EIS. However, this element of the environment was not included in the EIS Scope due to a lack of probable significant adverse impacts. This conclusion was reached based in part upon data from the Puget Sound Regional Council and Puget Sound Clean Air Agency websites. These sources include the PSRC's "*Destination 2030 Metropolitan Transportation Plan for the Central Puget Sound Region*" and the Clean Air Agency's 1998 *Annual Data Summary* and February 2001 monthly air quality summary report. The projections in these data indicate that carbon monoxide and three other modeled pollutants (VOC, NO_x and particulates) are expected to dramatically decrease at least through the 2020 timeframe, despite predicted increases in traffic and congestion.
3. The prospect of studying noise, toxic/hazardous materials and risk exposure was reviewed during scoping for this EIS. However, these elements of the environment were not included in the EIS Scope due to a lack of probable significant adverse impacts attributable to the alternatives.
4. Your suggestion for a light and glare study of City street lighting is noted. However, there is a lack of probable significant adverse impacts attributable to the alternatives.
5. Thank you for your comments. The Comprehensive Plan does set goals for open space in different types of urban environments to help determine where additional facilities are desirable, but it does not establish specific requirements. The zoning requirements for open space in the Land Use Code are at a finer level of detail than Comprehensive Plan goals and policies on public open space.
6. This EIS is the means of identifying and mitigating potential significant adverse impacts on the environment. No issues are identified as "deferred." To the extent that the public and agencies identify substantive topics of interest, they are addressed in this Final EIS. The SEPA environmental review process does not contemplate the sort of extended studies suggested in this comment. The relative performance of Downtown zoning will be evaluated over the long-term by the City.
7. Thank you for your comments.
8. Thank you for your comments on transition in height, bulk and scale.

Letter 27
Richard Stevenson

1. Thank you for comments and proposals regarding policy objectives for the DOC 2 and DMC zones and appropriate height and density limits for these areas. As stated in the Comprehensive Plan, the Downtown Office Core 2 (DOC 2) zone was established to provide “*areas adjacent to the office core appropriate for office expansion and where a transition in density to mixed-use areas is desirable.*”

The Downtown Mixed Commercial (DMC) zone was established to provide:

Areas adjacent to the office core, office expansion areas and retail core that provide a transition in the level of activity and scale of development. Areas designated DMC are characterized by a diversity of uses. The DMC land use district is intended to:

- *Permit office and commercial use, but at lower densities than in office areas;*
 - *Encourage housing and other uses generating activity without substantially contributing to peak hour traffic; and*
 - *Promote development diversity and compatibility with adjacent areas through a range of height limits.*
2. Through provisions established in the TDR program for transfers of development rights from affordable housing structures, landmark buildings, and open space, commercial development rights can be transferred within the DMC, DOC 1 and DOC 2 zones. While under current provisions TDR is not used to create new housing projects, it has been an effective tool to help preserve existing housing resources, and has been used to secure funding for several low-income housing structures in the Denny Triangle. Please see Chapter 1 of this Final EIS for discussion of the Preferred Alternative, which includes additional TDR provisions.
 3. Raising the maximum FARs can increase the amount of floor area in a project gained through bonuses. The degree to which this increase exceeds current conditions depends on whether the base FAR is increased as well, and to what extent relative to increases in the maximum FAR, and whether or not developers build to increased maximum limits.
 4. Your comments recommending elimination of upper level setbacks and coverage limits are noted. Please see Chapter 1 of this Final EIS for discussion of the Preferred Alternative.
 5. Thank you for your comments on the prospective benefits of your proposals.

Letter 28
Roger Wagoner

1. Thank you for your comments. They touch on some of the important matters to be considered by decisionmakers.
2. Please see Chapter 1 of this Final EIS for additional information on the Preferred Alternative.

Letter 29
Irene Wall

1. Chapter 2 of the Draft EIS described overall objectives of the studied alternatives, and documented the background of how the proposal came about, as an outgrowth of neighborhood planning in

Downtown. Please see Chapters 1, 2 and 3 of this Final EIS for additional discussion of alternatives, objectives and the public interest.

2. The cited Comprehensive Plan amendment concepts were tabled in 2004. The South Lake Union item cited would not have incorporated that neighborhood into the *Downtown* Urban Center. Projections of employment and/or residential growth for neighborhoods and sites outside Downtown will remain relevant to those particular areas. Downtown is subject to its own residential and employment growth trends and projections, which contribute to the need for planning and zoning analysis. Please refer to Chapters 1 and 3 of this Final EIS for further discussion of the Preferred Alternative and growth issues.
3. The topic of cumulative impacts on energy systems was discussed on page 3-208 of the Draft EIS. Recent updated information from City Light indicates that a new substation is projected to be needed to serve the study area after 2020, several years later than indicated in the Draft EIS. City Light is addressing and monitoring the Downtown and South Lake Union system relationships and necessary improvements.
4. According to the parking analysis for the Draft EIS (see Table 61 on DEIS page 3-199), there would not be a net loss of off-street parking. Rather, off-street parking would increase considerably under any of the alternatives. While approximately 7,000 to 7,500 existing parking spaces would be eliminated by future development, that development would provide an estimated 17,000 spaces to serve new commercial and residential uses. Depending upon how successful efforts are to encourage transit use, the projected demand for parking could exceed the supply by approximately 2,500 to 6,750 spaces in the year 2020. However, this exceedance does not account for potential choices by parking providers to build more parking to satisfy demand. Transit capacity will depend upon the funding choices made over the next 16 years, but several modes of transit are expected to be available.

Regarding the location of parking in a structure, the Draft EIS did identify a potential impact on streetscape and residential character due to parking on floors above street level. This is particularly an issue with residential development, because above-grade parking accessory to residential use does not count as chargeable FAR, so there is no incentive to provide it below grade, as there would be for commercial development. Parking above grade must be screened, and there are special screening standards, including screening by another use (such as retail) along the street front, that apply to parking located at street level. These standards vary according to the pedestrian designation of a street (see the response to comment 29 in Letter 5 above).

5. Thank you for your comments that suggest linking Downtown height and density increases to additional private investment in urban villages outside Downtown.
6. Thank you for your comments that suggest linking height and density increases to provision of needed amenities. This already occurs under the existing bonus system. Additional floor area for commercial uses above a "base limit" is gained by obtaining bonuses through which developers provide or contribute to the production and preservation of affordable housing, public open space, landmark preservation, human services, childcare and other public benefits. The TDC program also involves providing or contributing to a fund for public amenities in the Denny Triangle. The Preferred Alternative includes additional provisions that will aid in funding affordable housing and other needs, including provisions allowing residential development to build to proposed height limits only if projects contribute to affordable housing mitigation.

7. Thank you for your comments suggesting contract rezones as a mechanism for securing public benefits. A contract rezone typically occurs for one site at a time, with a contractual aspect that specifies the responsibilities of the applicant and the city. It allows customized conditioning that would apply to each site depending upon its unique characteristics and impacts. Conceptually, supposing an alternative comprised of site-by-site contract rezones was possible, it would be likely to considerably slow down the development review process and project decisionmaking for Downtown building proposals. Each proposal would be subject to individualized review and negotiation of zone characteristics and conditioning, and each would require Council decision processes. Such a system would not likely be feasible or advisable. It would contradict the concept of having systematic zone categories and regulations applicable within defined areas.
8. Thank you for your comments on zoning concepts and zoning as an incentive. Please see Chapters 1, 3 and 4 of this Final EIS for additional discussion of the Preferred Alternative. The Draft EIS did consider other approaches to promoting residential development, including the rezoning of some areas in Belltown and the Denny Triangle to less intensive residential designations in Alternative 3. Existing incentive programs have been successful in generating resources for a variety of public benefits that have contributed to the livability and vitality of Downtown, including landmark preservation and the production and preservation of low-income housing. Incentives developed to capture benefits during periods of strong economic activity cannot be adequately evaluated during economic lulls in the real estate market.
9. The suggested type of cost/benefit analysis is not required by the City's SEPA Rules and is beyond the scope of this EIS.
10. Thank you for your comments on view protection and alley vacations.
11. Based on the conclusions in the Draft EIS, creating building forms similar to those described as "Vancouver style" would require additional regulatory strategies. Please see Chapters 1 and 4 of this Final EIS for discussion of the Preferred Alternative, which would be comparatively better than current regulations in encouraging slimmer building profiles. Choices made following this EIS process will determine what specific packages of zoning changes are considered by decisionmakers, perhaps directed at bulk controls that will influence the shape of Downtown buildings. This will influence the net result, in terms of building bulk and open space character of future development.
12. Thank you for your comments on protecting low-income and subsidized housing.

Letter 30
David Williams

1. Thank you for your comments.



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JAN 12 2004

STATE OF WASHINGTON
DEPARTMENT OF COMMUNITY,
TRADE AND ECONOMIC DEVELOPMENT
128 - 10th Avenue SE • PO Box 42525 • Olympia, Washington 98504 • (360) 725-4000
Dept. of Design
Construction & Land Use

January 8, 2004

Ms. Diane Sugimura, Director
Department of Planning and Development
City of Seattle
700 Fifth Avenue, Suite 2000
Seattle, Washington 98104-5070

RE: Proposed downtown height and density changes.

Dear Ms. Sugimura:

Thank you for sending the Washington State Department of Community, Trade and Economic Development (CTED) the draft environmental impact statement (DEIS) for proposed amendments to Seattle's development regulations that we received on November 19, 2003. We recognize the substantial investment of time, energy, and resources that these documents represent.

We especially like the following:

- We applaud the initiative to allow more density, activity, and investment in downtown Seattle. The Growth Management Act (GMA) calls for urban growth served by efficient multimodal transportation, economic development that is consistent with planning, and affordable housing for all segments of the population. By encouraging infill development and allowing additional investment in the core of the city, these proposed changes to Seattle's development regulations are likely to support achievement of these GMA goals.

Seattle has already done a great deal to prepare downtown for an increase in development potential. Downtown is the most prominent urban center in the state, benefiting from vibrant economic and social activity and diverse land uses. It is served by major public infrastructure, and additional investments continue to be made to ensure that people are able to live, work, and access downtown. Development regulations allow a mixture of uses and a pedestrian-oriented environment. Given that this groundwork is in place, an increase in density could be very positive for the community.

- We commend the City of Seattle for the thoroughness of its draft environmental impact statement (DEIS). The document takes an in-depth look at the impacts and trade-offs of the

four alternatives (including no action) considered. Of particular use to decision-makers is the consideration the document gives to mitigating measures for the undesired impacts of each alternative. These and other measures will be essential in the effort to balance the many aims of community and economic development.

We have the following comments and suggestions you may wish to consider as you evaluate these and future proposed amendments. Intensification of downtown development could accomplish a number of GMA goals. However, good community planning calls for striking a balance among the full spectrum of community goals. We strongly support examining the mitigating measures identified by the DEIS, and others, that address impacts of increased height and bulk, in the spirit of balancing the desire to accommodate density with the need to maintain a quality environment.

In addition, several potential impacts strike us as particularly important to mitigate:

- The DEIS is clear that intensification of development could endanger downtown's supply of affordable housing and housing resources. We urge Seattle to provide and leverage the funding, and to take other steps, as necessary to preserve existing affordable and market rate housing and housing resources downtown, and to create additional units in all price ranges.
- The DEIS points out that under any of the scenarios (including the no action alternative) downtown is not meeting the comprehensive plan goals for open space. We acknowledge that, in general, intensive development is likely to represent the highest and best use of land in this area. Nonetheless, in order to foster livability downtown we advise the city to plan for public open space in the area and carefully weigh the impacts of additional development on its availability. Also, given that public open space within downtowns consists largely of the sidewalks and streets, we strongly recommend the continuation and expansion of efforts to improve the interface between pedestrians and vehicles such as road crossings, the addition of pedestrian amenities including street trees and furniture, and strengthening policies requiring development to be pedestrian and transit oriented.

In addition to the mitigation measures proposed in the DEIS the city could consider meeting the intent of the comprehensive plan by facilitating creation of areas that serve as open spaces within and on top of buildings. In a highly urban environment, structured public, semi-public, and private spaces such as lobby atriums and rooftop gardens could help to meet the intent of the open space goal, bring trees and plants into the city, and even help to reduce the stormwater impacts of additional development. We suggest that methods to foster such practices be considered, including review of development regulations to identify and consider removing regulatory barriers to such practices, and working with developers through regulatory, voluntary, and/or incentive-based approaches. For more information, the City of Seattle's own Office of Sustainability & Environment is an excellent resource (and may already have provided input on this DEIS). In addition, a number of organizations, including Green Roofs for Healthy Cities (<http://www.greenroofs.ca/grhcc/index.html>) and Project for Public Spaces (<http://www.pps.org/>), provide information and resources related to urban open spaces and rooftop gardens.

Ms. Diane Sugimura
January 8, 2004
Page 3

- As proposed in the DEIS, the transportation impacts of additional development should be mitigated through fostering transit and alternative travel modes. We are particularly impressed with the Transportation Demand Strategies proposed for transportation and parking impacts, and support the creation of a Transportation Management Association of downtown stakeholders (DEIS, page 1-29). Among many excellent sources for information regarding tools for transportation-efficient development, *Strategies and Tools to Implement Transportation*, prepared for the Washington State Transportation Commission, September 2003, is a current and exhaustive resource.
- We support the suggestions made in a letter to Seattle dated December 2, 2003, from Gregory Griffith of the Department of Archaeology and Historic Preservation regarding preserving historic assets in the area.

In summary, we encourage the city to continue to move forward in selecting a preferred alternative, and strongly advise that an appropriate package of mitigation strategies be adopted simultaneously. Throughout this and other planning processes, we advise you to consider downtown Seattle both as the heart of the state's largest urban center, and as a cluster of neighborhoods in their own right (as acknowledged through the neighborhood planning process). Due consideration should be paid to ensuring that the area will function well both as a regional center and at the neighborhood level. While continuing to foster development in the area, we suggest that to the extent possible GMA and community goals be implemented at a fine-grained level within neighborhoods. This approach may call for additional mitigation measures, or possibly some reduction of development intensity. We argue that regulations that foster both development as well as key elements of neighborhood livability, cultural heritage, housing affordability, and social diversity can and should be a part of the continuing development of downtown.

Congratulations to you and your staff for the good work these proposals embody. If you have any questions or concerns about our comments or any other growth management issues, please call me at (360) 725-3048, or Ike Nwankwo at (360) 725-3056. We extend our continued support to the City of Seattle in achieving the goals of growth management.

Sincerely,



Elliott Barnett
Assistant Planner
Growth Management Services

EB:lw

cc: Gordon Clowers, Planner, City of Seattle
Ike Nwankwo, Technical & Financial Assistance Manager, CTED



STATE OF WASHINGTON
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December 2, 2003

Ms. Diane Sugimura
City of Seattle Dept. of Planning and Development
700 Fifth Avenue, Suite 2000
Seattle, Washington 98104-5070

In future correspondence please refer to:

Log: 120203-07-KI

Re: Downtown Height and Density Changes DEIS

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DEC 04 2003
LOCAL GOVERNMENT

Dear Ms. Sugimura:

The Washington State Office of Archaeology and Historic Preservation (OAHP) is in receipt of the Draft Environmental Impact Statement (DEIS) regarding the above referenced proposal. From the document, I understand that the Seattle City Council is considering adopting three alternatives that will increase allowable maximum heights and densities of buildings in several downtown zones including the Denny Triangle, Commercial Core, and Belltown.

In response, review of the DEIS by OAHP staff leads to our support of the height and density changes in concept. This support is derived from our understanding that the proposed changes are intended to foster expanded activity and uses (including residential) in the target neighborhoods. However, we strongly maintain that implementation of increased heights and densities should not come at the expense of historic properties in these neighborhoods. Historic properties (buildings, structures, districts, sites, and objects that are 50 years of age and older) are increasingly rare in these areas and already under intense development pressures. Therefore, I recommend that adoption of increased downtown height and density changes also be accompanied by commensurate protective mechanisms for historic properties. We recognize that the DEIS identifies several mitigation strategies. We also support these strategies but reiterate that mitigation measures should be implemented in tandem with proposed height and density changes. In addition, it should be noted that protective measures be considered for more than already designated City Landmarks and National Register of Historic Places properties. Properties potentially eligible for designation (for City and/or National Register designation) should be identified (inventoried) upon program implementation and receive protection from any proposed application of increased heights and densities. It is also recommended that local historic preservation entities and preservation professionals be invited to participate in the increased height and density program design and implementation. Such participation in the program implementation by the preservation community should help to avoid conflicts in the long-term and streamline the development process.

Thank you for the opportunity to review and comment on this proposal. Should you have any questions, please feel free to contact me at 360-586-3073 or gregg@cted.wa.gov.

Sincerely,


Gregory Griffith
Deputy State Historic Preservation Officer

Cc: Karen Gordon
Ike Nwankwo, Growth Management





King County

Water and Land Resources Division

Department of Natural Resources and Parks

King Street Center

201 South Jackson Street, Suite 600

Seattle, WA 98104-3855

206-296-6519 206-296-0192 Fax

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FEB 04 2004

Dept. of Design
Construction & Land Use

January 28, 2004

Diane Sugimura, Director
Department of Planning and Development
700 Fifth Avenue, Suite 2000
Seattle, WA 98104-5070

Dear Director Sugimura:

I am writing to record the King County Department of Natural Resources and Parks comments on the Draft Environmental Impact Statement (DEIS) for Downtown Height and Density Changes dated November 2003. The city's efforts to increase housing opportunities in the downtown area are to be commended. These efforts will help the region achieve our growth management goals and create vibrant urban centers. However, we are concerned that the alternatives considered in the DEIS will have potential negative impacts on the King County Transfer of Development Rights (TDR) Program.

In April 2000, the City of Seattle and King County forged a regional partnership to transfer rural residential density into the Denny Triangle pursuant to an interlocal agreement unanimously adopted via King County Ordinance No. 13794. This partnership achieves a number of mutually beneficial policy goals, including focusing growth in urban areas and limiting growth in rural areas, as well as protection of drinking water quality in the Cedar and Tolt River Basins, and protecting salmon habitat. The Washington State Growth Management Act (GMA) directs development to urban areas discouraging inappropriate conversion of undeveloped rural land into sprawling, low-density development, and encourages the conservation of productive forest lands and productive agricultural lands.

Adopted Countywide Planning Policies direct jurisdictions in King County to implement programs and regulations to protect and maintain the rural character of rural, farm, and forest lands, and to direct growth to cities and urban centers. Rural and agricultural production district areas in the County are recognized as containing important Countywide public benefits such as forestry, agricultural resources and salmon habitat. Finally, under provisions of the Endangered Species Act (ESA) the County and the City share a strong interest in the preservation of salmon habitat.

1

Diane Sugimura
January 28, 2004
Page 2

In our current partnership, lands near Seattle's two protected watersheds, the Cedar and Tolt, will be protected; ensuring continued high-quality drinking water for the region. Priority rural sending sites include areas with endangered species habitat, open space/regional trail access, and wildlife corridors. Finally, housing supply and choices in downtown Seattle will grow, directly supporting Seattle's Comprehensive Plan and the Denny Triangle's neighborhood plan.

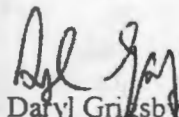
Alternatives in the DEIS propose to increase residential and employment opportunities to meet growth targets. While we applaud these proposals, they also eliminate or severely reduce the receiving capacity of the Denny Triangle neighborhood to accept density from the rural area. Alternative One eliminates the King County TDR Program, and Alternatives Two and Three shrink the potential receiving area within the Denny Triangle.

As a commitment to improve the livability of the Denny Triangle neighborhood, King County has earmarked \$500,000 in local funds for public amenities. Under the terms of the Denny Triangle Interlocal Agreement, King County has already transferred \$100,000 to the City of Seattle Design of Greenstreets. The remaining \$400,000 in local funds plus a \$432,000 Federal Transit Administration grant will be transferred to the City when development rights are transferred into the Denny Triangle.

As cited in the DEIS, there are at least six Denny Triangle projects considering accepting development rights. Two transfers, using a combined total of 51 rural development rights, are scheduled for completion in the next few months. Unfortunately, these projects will evaporate if density and height limits are increased without maintaining the current requirement to acquire rural development rights.

Thank you for your consideration of our comments. Please let me know if you have any questions or would like to discuss our comments.

Sincerely,


Daryl Grigsby
Division Director

cc: Pam Bissonnette, Director, Department of Natural Resources and Parks (DNRP)
Bob Burns, Deputy Director, Department of Natural Resources and Parks (DNRP)
Mark Sollitto, Manager, Transfer of Development Rights Program, Water and Land
Resources Division, DNRP



King County Department of Transportation
 Metro Transit Division
 201 South Jackson Street
 Seattle, WA 98104-3856

February 27, 2004

Dennis Meier
 City of Seattle
 Department of Planning and Development
 700 Fifth Avenue, Suite 1900
 Seattle, WA 98104-5070

RE: City of Seattle Downtown Height and Density Changes DEIS

Dear Mr. Meier:

This letter provides comments from the King County Metro Transit Division on the Department of Planning and Development's (DPD) Height and Density Limit DEIS. We generally support increases to height limits and density, but all alternatives generate significant impacts on the ability of transit to serve the community. We recommend that the City develop a plan to mitigate the transportation impacts of population growth and develop transit-friendly infrastructure in order to ensure transit continues to be a viable form of transportation.

Heights of buildings are only one component of smart growth, which can be defined as a type of development with the goals of minimizing dependence on auto transportation, reducing air pollution, and preserving open space by channeling dense, pedestrian friendly, mixed-use growth into existing communities. A comprehensive program is needed that does not simply increase heights, but also makes public transportation a feasible alternative to the car, develops mixed-use communities (especially emphasizing housing), and encourages development in urban areas. These comments specifically address how the City can make public transportation more viable in the future, as a healthy public transportation system is vital to dense urban-core communities.

The role of the developer has often been overlooked in discussions about smart growth, but the high rise building and high rise developers do more for transportation demand management than many other available mechanisms by significantly increasing density. Developers have been calling for increased density through fewer restrictions on height limits and are calling for increases above those in Alternative 1. This creates an excellent opportunity to link public interest in reduced traffic congestion with the interests of developers to increase building heights. This link can be created by forming incentives to encourage property owners to invest more fully in the transportation system and their tenants, and by creating an environment in which transit can flourish.

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Because the DEIS holds population and employment constant across alternatives, it does not identify the actual impacts of adding additional height and density. The analysis addresses only redistribution of density within the downtown area, holding totals constant. And by excluding evolving nearby activity centers from the analysis, the DEIS does not discuss the cumulative impacts of adding density to the Denny Triangle and South Lake Union. For these reasons we are focusing our comments on the general conditions that need to be met for transit to succeed with meeting increased transportation demands under any of the proposed land use changes.

Our suggestions for a successful transit system are organized into two categories related to creating the link between public and developer interests: transit impacts and market-based incentives. Primary concerns include the following: level of transit service and layover space required to serve increased numbers of riders; increased transit delay; reductions in available layover spaces; the importance of incorporating market-based incentives, parking policy changes and transportation bonuses to support increases in heights and housing; and mitigation of the impacts of increased density and congestion.

Transit Impacts

The transportation study only addresses two corridors in relation to transit impacts: Stewart Street and Olive Way. Much of the regional transit service uses these corridors, but local Seattle neighborhood services use other corridors. The selected screenlines (Denny Way and north of Seneca) begin to address the local service, but may not give a comprehensive picture of the level of service and consequent impacts on congestion.

Existing and Planned Transit Service Issues

Given the projected amount of growth, servicing the Denny Triangle area will be difficult under all scenarios with current levels of transit service. The amount of transit service needed to serve Downtown Seattle's projected demand in the future is greater than can be provided under current Metro revenue projections. Planned and current transit infrastructure in downtown is not currently focused on the Denny Triangle portion of the study, where much of the population and employment growth is projected to occur. Current light rail and monorail plans bypass the Denny Triangle area. Future light rail expansion will supplant bus service in the downtown transit tunnel eventually resulting in elimination of tunnel service to Convention Place Station. Planning needs to begin now for serving the new populations and funding the new service given tight budgetary constraints.

Serving an expanded high-density office core in the Denny Triangle would be extremely difficult with existing transit service. Currently, express buses from the I-5 express lanes, I-90 and I-5 south corridors enter the CBD at the south and work their way north. Except for the bus tunnel, transit operation through the CBD is slow and unreliable, decreasing the attractiveness of transit to points north of the commercial core. Seattle's Center City Circulation Study would put buses serving Seattle neighborhoods north and south of the CBD on Third Avenue, requiring passengers to transfer or walk a significant distance to reach the Denny Triangle area. When South Lake Union development is added to the equation, these challenges are magnified.

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To provide similarly attractive services to the Denny Triangle from these corridors, either (1) the travel delay and variability need to be reduced through priority or separation from traffic to allow existing routes to serve both north and south downtown areas, (2) separate routes need to be provided entering the CBD at the north, or (3) a high capacity transit connection is needed that places a station in the area where density will increase. Any of these options would require significant resources.

Transit Delay

The three change alternatives cause more delay due to congestion at the transit screenlines identified in the DEIS than the baseline, and rising congestion increases transit operating costs. Given the projected increase in congestion across all alternatives, the City must make it a priority to reduce the impacts of increased congestion on transit by investing in additional transit only lanes or corridors, transit priority at additional stop lights, queue jumps, increased parking restrictions near bus stops, etc. There is some mention of possible mitigation measures for transit, but the chosen mitigation measures should aggressively address the delay issues and be co-developed and coordinated with Metro.

Reductions in Available Layover Space

A large number of regional and local bus routes begin and end service in the north Downtown Seattle area. It is critical for efficient transit system operation (e.g., reliable schedules and maintenance of cost-effective operating costs) that layover space is provided as close as possible to the beginning and end of the service portion of a route. As noted in the DEIS, increased density and development in the Denny Triangle and/or Denny Regrade areas will make it increasingly difficult for Metro to maintain existing and/or accommodate new, on-street layover space, on an interim and/or long-term basis, due to competing curbspace uses and Green Streets objectives. At the same time, additional service provided to the area will result in increased layover needs.

There are a number of side streets in the Study Area that have been designated as Green Streets and that are currently utilized for on-street layover. The City needs to decide whether layover spaces are incompatible with a Green Street designation. If layover is determined to be incompatible with Green Streets, then we (the City and KCM) need to develop a plan and a written agreement to address this issue prior to the City adopting standards to redevelop these streets. If some streets morph into Green Streets and transit layover is incompatible, then other streets must morph into other uses compatible with transit layover. If transit layover is compatible with Green Streets, then we need to develop an agreement stating this and acknowledging that transit is part of the Green Street concept.

All the alternatives result in reductions to both current and potential layover sites with the no-change alternative causing the most significant decrease in current and potential layover sites. On-street layover information found in Figure 34, "Potential Future Layover On-Street Layovers," is outdated and should be updated in the FEIS to reflect current and potential layover spaces (see Attachment 1). In consideration of the updated layover and Green Streets information, the FEIS should include recalculations of layover impact data for all alternatives including no-change.

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Lastly, the FEIS needs to address how existing layover spaces will be protected and new spaces provided that would preserve cost effective transit service for the CBD. The City must be willing to demonstrate a commitment to KCM to maintain and/or replace on-street layover spaces until additional interim and/or long-term layover facilities are available to replace those spaces lost through anticipated development and transit service growth in the north Downtown Seattle area.

Other Issues

- Improve pedestrian amenity requirements in the Denny Triangle by making them comparable to downtown Seattle.
- Develop incentives for narrower buildings to increase opportunities for pedestrian walkways, thoroughfares and open space.

Market-Based Incentives

The proposed alternatives do not address parking issues and do not incorporate transportation-specific height bonuses. The DEIS outlines many traffic and congestion impacts resulting from future employment and residential growth; the transportation height bonuses and parking policy changes recommended below can be used to mitigate these impacts. In addition to the parking and height bonus suggestions, we follow with a preferred approach.

Parking Issues

The current parking minimum reflects an inflated supply of parking, especially for future years. We recommend allowing the market to determine the number of parking spaces below the maximum through the following measures:

- Remove or substantially decrease the parking minimum [Spillover parking problems could be problematic, but given the high proportion of metered parking and the availability of almost no free parking, spillover effects would not likely be significant in the downtown. More people may choose to park in outer communities, but this would simply put upward pressure on parking prices in those areas, thus discouraging more people from driving.]
- Simplify the process used to take advantage of reductions below the parking minimum
- Include a reduction in parking requirements in exchange for contributions to a transportation mitigation fund (additional if some contribution is already required), pedestrian/bike improvement fund, transportation program fund, or other purpose
- Increase the percentage reduction (greater than the current 15 percent) in parking construction if residents in addition to employees are given free bus passes for at least five (5) years.

Incorporating Transportation in Height Bonuses

The transportation bonuses outlined below expand available bonuses, mitigate the impacts of increased development on transit, and further transportation concurrency (tying development and transportation together). Expanding the types of bonuses available would increase the likelihood of a developer taking advantage of a bonus, would better incorporate market incentives in the

development code, and would encourage positive amenities through market forces rather than prescriptive standards.

Suggestions to incorporate transportation include:

- *The Zero Traffic Building* – If a building incorporates all of the items below, or a combination sufficient to significantly reduce trips generated to and from the building then the developer has the ability to build up to the maximum FAR. Contributions to the Area-Wide Transit Service Fund and the Mitigation Fund would be weighted more heavily than other bonuses due to the higher impact on improving the transit operating environment.
- *Transportation Incentive FAR Bonus* – Height bonuses in exchange for offering transportation incentives to employees and/or residents beyond what is normally required in a Transportation Management Programs (TMP).
- *Transportation Infrastructure* – Bonus FAR for building transportation infrastructure focused on alternative modes like showers, lockers, permanent bicycle storage, contributions to a Bikestation, Flexcar parking spaces or incentives, and/or pedestrian amenities. The City of Portland has incorporated this incentive structure in its code.
- *Commercial Bonus* – Developers get more commercial space for including residents in their transportation program and get increasing amounts for increased commitment (at least a five-year commitment).
- *Area-Wide Transit Service Fund* – Height bonuses for contributing to area-wide transit service fund, pedestrian/bike improvement fund, or transportation program fund. This could pay for some of the needed transit service in the Denny Triangle.
- *Mitigation Fund* – We support development of a Transportation Mitigation Program as described in the DEIS and as currently exists with the Bank of America Tower.
- *Improving Density* – The City currently incorporates height bonuses for creating a public open space, constructing a hillclimb assist, shopping corridor, or transit tunnel station access. It would be beneficial to expand this definition to include provision of transit layover space, sidewalk improvements, striping a bike lane, surface bus stop improvements, or others at a specific level of monetary commitment.
- *Incentives to Unbundle Residential Parking* – Encourage building owners and managers to charge for leases and parking separately. This idea would especially work in mixed-use developments.

Preferred Approach

The preferred approach would see the developer as a constructive partner with mutually compatible objectives. Specific components of the approach would include:

- No parking required for commercial, retail, or other non-residential. The developer would decide the amount of parking below the maximum required for each development.
- Offer increased heights in exchange for investments in transportation because developers have an economic motivation for increasing heights and encourage the Zero Traffic Building.

- Place significant energy on creating an Area-Wide Transit Service Fund, funded by developer contributions, to help fund service in areas with less extensive service (e.g. Denny Triangle).
- The City's Circulation report anticipates transit will carry almost all growth in future trips to the Seattle CBD. Given the limited availability of additional transit funds and the significant growth in transit trips, encourage housing within or proximate to high rise development as a strong form of traffic mitigation.

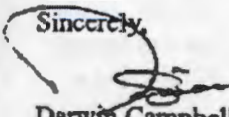
Recommendations

The preferred alternative would increase maximum height limits above the current guidelines (similar to Alternative 1 or higher) and would be part of a program aimed at improving the operating environment for transit and incorporating housing by creating residential friendly zoning (as in Alternative 3). The preferred alternative would allow more height above the base through bonuses to increase density and would expand allowable bonuses to incorporate more extensive transportation bonuses so developers commit to the community by providing housing, transportation benefits, or public amenities in exchange for increased height.

Metro hopes to actively participate in a broader process to ensure we can both maximize transit use to the downtown, and effectively deliver the transit services that new development will require. A healthy public transportation system is essential to creating a thriving urban community. The chosen alternative needs to be part of a comprehensive program that not only increases heights, but also increases the viability of public transportation.

To discuss further, please contact Sharon Slebodnick, Senior Transit Planner, Transit Route Facilities, at 206-684-1321; Rob Fellows, Senior Transit Planner, Service Planning, at 206-684-1449; or Sunny Knott, Transit Planner, Market Development, at 206-263-6397. Thank you for the opportunity to comment.

Sincerely,


Darwin Campbell
Acting General Manager
King County Metro Transit

Attachment

cc: Jim Jacobson, Deputy General Manager, KC Metro Transit
Eric Gleason, Manager, Service Development, KC Metro Transit
Sharon Slebodnick, Senior Transit Planner, Transit Route Facilities, KC Metro Transit
Rob Fellows, Senior Transit Planner, Service Planning, KC Metro Transit
Sunny Knott, Transit Planner, Market Development, KC Metro Transit

ATTACHMENT 1
PAGE 1

Current On-Street Transit Layover

Count:	Direction of Travel:	On Street:	Side of On Street:	Side of Intersection:	Cross Street:	Transit Agency:
1	Southbound	2nd Ave	West	Nearside	Lenora St.	METRO
2	Northbound	8th Ave	East	Farside	Blanchard St.	METRO
3	Northbound	8th Ave	East	Farside	Westlake Ave.	METRO
4	Southbound	9th Ave	East	Nearside	Pine St.	METRO
5	Southbound	9th Ave	West	Nearside	Stewart St.	METRO
6	Eastbound	Battery St.	South	Nearside	4th Ave.	METRO
7	Westbound	Bell St.	North	Farside	7th Ave.	METRO
8	Westbound	Bell St.	North	Farside	6th Ave.	METRO
9	Westbound	Bell St.	North	Farside	8th Ave.	METRO
10	Westbound	Bell St.	South	Farside	7th Ave.	METRO
11	Westbound	Bell St.	South	Nearside	6th Ave.	METRO
12	Westbound	Bell St.	North	Nearside	6th Ave.	METRO
13	Westbound	Bell St.	North	Nearside	5th Ave.	METRO
14	Westbound	Bell St.	South	Farside	6th Ave.	METRO
15	Westbound	Bell St.	North	Nearside	7th Ave.	METRO
16	Eastbound	Blanchard St.	South	Nearside	2nd Ave.	METRO
17	Eastbound	Blanchard St.	South	Farside	5th Ave.	METRO
18	Eastbound	Blanchard St.	South	Farside	6th Ave.	METRO
19	Eastbound	Blanchard St.	South	Nearside	7th Ave.	METRO
20	Eastbound	Blanchard St.	North	Farside	7th Ave.	METRO
21	Eastbound	Blanchard St.	North	Nearside	8th Ave.	METRO
22	Eastbound	Blanchard St.	South	Farside	1st Ave.	METRO
23	Westbound	Lenora St.	North	Farside	7th Ave.	METRO
24	Westbound	Lenora St.	North	Farside	6th Ave.	METRO
25	Westbound	Lenora St.	North	Nearside	5th Ave.	METRO
26	Westbound	Lenora St.	North	Farside	5th Ave.	METRO
27	Westbound	Lenora St.	North	Farside	3rd Ave.	METRO
28	Westbound	Lenora St.	North	Farside	4th Ave.	METRO
29	Westbound	Lenora St.	South	Farside	5th Ave.	METRO
30	Westbound	Lenora St.	North	Nearside	6th Ave.	METRO
31	Westbound	Lenora St.	North	Nearside	2nd Ave.	METRO
32	Westbound	Lenora St.	North	Nearside	7th Ave.	METRO
33	Westbound	Lenora St.	North	Nearside	4th Ave.	METRO
34	Southbound	Minor Ave	West	Nearside	Stewart St.	METRO
35	Eastbound	Olive Way	West	Nearside	9th Ave.	METRO
36	Eastbound	Olive Way	South	Nearside	Terry Ave.	METRO
37	Westbound	Stewart St.	North	Nearside	Boren Ave.	CT
38	Westbound	Stewart St.	North	Nearside	Yale Ave N.	CT
39	Westbound	Stewart St.	North	Nearside	Minor Ave.	CT
40	Eastbound	Virginia St.	South	Farside	2nd Ave.	METRO
41	Eastbound	Virginia St.	South	Nearside	3rd Ave.	METRO
42	Eastbound	Virginia St.	South	Farside	4th Ave.	METRO
43	Eastbound	Virginia St.	South	Nearside	4th Ave.	METRO
44	Northbound	Warren Pl.	East	Farside	1st Ave.	METRO

N:\Zones\Layover\Tabular List of NCBD Terminals

Prepared By: Daniel Well, Metro, 3/1/2004

ATTACHMENT 1
PAGE 2

Potential On-Street Transit Layover

Count:	Direction of Travel:	On Street:	Side of On Street:	Side of Intersection:	Cross Street:
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1	Eastbound	Virginia St.	North	Nearside	2nd Ave.
2	Eastbound	Virginia St.	South	Farside	3rd Ave.
3	Eastbound	Virginia St.	North	Farside	3rd Ave.
4	Eastbound	Virginia St.	North	Farside	5th Ave.
5	Eastbound	Virginia St.	North	Nearside	6th Ave.
6	Eastbound	Virginia St.	South	Nearside	Westlake Ave.
7	Westbound	Lenora St.	South	Farside	7th Ave.
8	Westbound	Lenora St.	South	Farside	6th Ave.
9	Westbound	Lenora St.	South	Farside	4th Ave.
10	Eastbound	Blanchard St.	South	Nearside	4th Ave.
11	Eastbound	Blanchard St.	South	Farside	7th Ave.
12	Eastbound	Blanchard St.	South	Farside	8th Ave.
13	Westbound	Bell St.	South	Farside	8th Ave.
14	Westbound	Bell St.	South	Farside	4th Ave.
15	Westbound	Bell St.	South	Farside	3rd Ave.
16	Eastbound	Battery St.	South	Farside	2nd Ave.
17	Eastbound	Battery St.	North	Farside	3rd Ave.
18	Eastbound	Battery St.	South	Farside	5th Ave.
19	Westbound	Wall St.	South	Nearside	5th Ave.
20	Westbound	Wall St.	South	Farside	3rd Ave.
21	Westbound	Wall St.	South	Nearside	2nd Ave.
22	Southbound	5th Ave.	East	Farside	Wall St.
23	Southbound	5th Ave.	East	Farside	Battery St.
24	Northbound	Westlake Ave.	West	Farside	Denny Way
25	Westbound	John St.	South	Farside	Westlake Ave.
26	Westbound	John St.	South	Nearside	9th Ave.
27	Southbound	9th Ave.	East	Nearside	Denny Way
28	Southbound	9th Ave.	West	Nearside	Denny Way

N:\Zones\Layover\Tabular List of NCBD Terminals

Prepared By: Daniel Wells, Metro, 3/1/2004



City of Seattle
Seattle Planning Commission

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Barbara E. Wilson,
Analyst

February 27, 2004

Dennis Meier
Department of Planning and Development
City of Seattle
700 Fifth Avenue
Seattle, WA 98104

Seattle Planning Commission Comments on the Downtown Height and Density Changes DEIS

Dear Mr. Meier:

The Planning Commission appreciates the opportunity to contribute its comments on the Downtown Height and Density Changes DEIS. This is a complicated set of issues, and we applaud the work of DPD staff in developing and analyzing the alternatives and in assessing potential impacts. We also appreciate the extension of the comment period and additional opportunity through the February 24 public forum to hear from the public.

It appears that the alternatives are designed to present different configurations for increased height and density and their impacts, without necessarily representing four distinct fully developed packages. Hence, the Planning Commission has not taken a position on the alternatives at this point, and is looking to the Final EIS to provide a thorough description and rationale for more refined alternatives with detailed analysis of impacts and mitigation measures

Overall Comments

In general the DEIS document is clear, straightforward and well written. It provides a very good summary with tables that present a comparison of the four alternatives that is easy to understand. The report also makes good use of graphics except for the initial massing map showing all four alternatives – this shows barely any perceptible differences among the alternatives. Maps in the document leave some confusion about the actual boundaries between study area and Belltown and where the transition is between them. **The Final EIS should provide a clear map that shows the boundaries of the study area as well as boundaries of the adjacent neighborhoods.**

Given the Mayor's recent call for more density (doubling the downtown population targets) in the Center City and taller slimmer buildings, it is not clear whether the range of alternatives presented in this document is expected to achieve that goal. The Final EIS should more explicitly describe the Mayor's proposal and address the extent to which these ideas can be incorporated into the existing four alternatives. **The Final EIS should also reference how well these alternatives achieve the Comp Plan goals of concentrating growth in the center city.**

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The range of alternatives does a fairly reasonable job of bracketing the possible scenarios and in identifying possible impacts. However, Commissioners note that it would be helpful to have an alternative that encourages housing and job creation while providing more open space and a livable environment. **The preferred alternative that we assume will be presented in the Final EIS should strive to draw the best features from several alternatives and pay close attention to the livability of the areas where residential development is encouraged.**

Overall the mitigation section is not very strong or detailed. This may reflect the nature of the proposals, but **the Final EIS should be expanded to provide more detailed analysis of the potential methods for mitigating identified impacts. It should also discuss more explicitly the public benefit that is achieved with each of the alternatives.**

Finally the Transfer of Development Credits (TDC) program discussion is somewhat confusing. **The Final EIS should provide a more thorough assessment of the experience of the TDC program and discuss its future potential based on the actual experience the City has had with it and how it would work in the proposed alternatives.**

Underlying Assumptions; Overall Approach

The City's Comprehensive Plan, King County and the region goals share a growth management strategy based on the premise that more density of jobs and housing in the core cities is critical to preserving open space, limiting additional sprawl and reducing the growth of traffic congestion. As the region's primary urban center, downtown Seattle plays an important role in accommodating future growth and density. An additional assumption of the City's Comprehensive Plan is that urban centers will be safe, attractive pedestrian oriented environments with housing that serves a broad range of incomes and a wide variety of services within walking distance of residences.

The Final EIS should provide a clearer description of the overall approach represented by each of the alternatives – e.g. residential enclaves versus more mixing of commercial and residential uses, including an analysis of the pros and cons of each of them in reaching Comp Plan and neighborhood plan goals. This should include a clear indication of the City's approach and commitment to providing the services and amenities that are essential to dense in-city residential living. It should also discuss how the alternatives contribute to the overall balance among housing, jobs and amenities within the City's densest urban center.

The Final EIS also should provide a more detailed discussion of the implications of these various alternatives on the other urban centers and villages in Seattle and in the region. For example, if this additional commercial and residential development does not occur in downtown Seattle, what is the impact regarding the demand for density and growth in other urban centers, in lower density neighborhoods in Seattle, and in other areas in the region? What is the impact of significantly increasing housing supply downtown on housing prices and affordability? Are the projected housing and commercial development targets realistic in terms of projected demand for commercial/office space and housing? The Final EIS should address these issues, with more analysis of the market for housing, including the market for families with children and related services such as schools.

Specific Comments

Population and Employment

This section provides a thorough background in population and employment trends as well as projections for future growth. **The Final EIS should acknowledge the uncertainties of projections for both population and employment growth in the downtown core, noting the variety of factors that influence actual growth over time.**

8

Final EIS should also address the implications of increased capacity for both employment and residential population in the downtown core. What impact does this have on other urban centers within the Center City or nodes in other urban centers? What is the projected impact of increasing employment and housing in South Lake Union (and potentially in Interbay) on the potential for concentrating development in downtown, or current efforts to promote more housing and commercial development in Northgate? Also, does the elimination of the Transfer of Development Credits (TDC) program have an appreciable impact on regional goals to preserve open space outside the urban centers?

9

Housing

The background data is well presented and provides a clear understanding of the current housing situation. While the Commission basically agrees with the notion of concentrating housing and jobs in the downtown area, **the Final EIS should provide a thorough assessment of the implications of various alternatives for neighborhoods such as Pioneer Square, the International District and Belltown, some of which are below their housing targets. This should include meeting overall housing targets and for meeting housing affordability goals.**

10

The Final EIS should also assess the likelihood that housing will be built in the DOC 1 and 2 areas, versus all commercial development – and the implications of these various scenarios. The point here is to go beyond what the zoning might be to assess the likelihood of achieving the intended goals of getting both residential and commercial development in the DOC 1 and 2 areas.

11

The Final EIS should also carefully assess the alternatives' impact on existing subsidized housing and on the future ability to maintain a balance of housing types (i.e. serving different income levels; attracting different types of households) as is sought in downtown neighborhood plans as well as the Comprehensive Plan. In particular, the resources leveraged through the Downtown Bonus program should show a range, rather than what will be available if all sites are fully developed (Table 19).

12

Finally the Final EIS should provide a more specific analysis of how smaller scale housing in Belltown is affected (or not) by larger scale residential and commercial development, particularly along the boundaries between these areas.

13

Land Use

Overall the section is thorough in its description of existing conditions and of the various alternatives. As noted in the overview statements, these alternatives do not seem to reflect the Mayor's recently stated goal of taller, thinner buildings that would provide visual open space in this very dense part of the city.

14

The DEIS does not do an adequate job of identifying and considering the impacts of the alternatives on historic buildings. It also understates the number of buildings that are eligible for City landmark designation. **The Final EIS should provide a amore detailed analysis, drawing on previous studies such as the Metro Tunnel EIS for buildings on Third Avenue, Allied Arts' Terra Cotta Building inventory, Historic Seattle's inventory of historically significant buildings, and the recent Monorail DEIS. It should also document which of these buildings provide affordable housing, a fact which is not reflected in the DEIS.**

15

The Final EIS should more thoroughly address potential effects of high density development (with higher heights, and more bulky structures) directly adjacent to lower scale mixed-use areas such as the Pike Market and Belltown. This section should also include an analysis of the impact on land costs and parking created by these alternatives. Finally, maps of the alternatives should show mixed use/residential development in adjacent areas to provide a more accurate context (e.g. development along Western Avenue in Belltown).

16

In general the Commission supports the use of transition zones and urges that these be provided between intensive commercial/retail uses and residential and related uses in the preferred alternative(s). **The Final EIS should examine the alternatives regarding how these transitions are handled.**

17

Height, Bulk and Scale

Greater height and density can be a good thing, since it helps the City achieve its urban village strategy as well as City Comprehensive Plan and regional growth management goals to concentrate housing and employment in key urban centers. However, it needs to be done in a way that produces the intended results of livable communities.

The Final EIS should describe how the various alternatives would achieve residential areas that create a desirable street environment, which is influenced by street width and block lengths as well as height, bulk and scale of the buildings. This issue merits particular scrutiny in the Denny Triangle area where key streets are fairly narrow and blocks are longer than in other areas of downtown. The impacts on light and shadow and the sense of enclosure and how they affect a potential residential environment should be considered. As noted elsewhere, alley vacations should also be considered for their impact on the scale of development and the resulting street environment.

18

Design flexibility is critical to successfully creating an overall street environment that is attractive and accommodates residential as well as office/commercial uses. For example, changes in the land use code need to be intentional in the relationship between height, bulk, and scale to preclude unintended negative impacts on existing uses or creating an uninviting environment, particularly in areas where a residential environment is intended. Design guidelines, particularly for the Denny Triangle neighborhood, could be helpful in dealing with these issues.

As noted in the general comments, the graphics do not show clearly the differences among the alternatives regarding height, bulk and scale. **The Final EIS should include illustrations showing different perspectives including street level views, views along major corridors, and perspectives from nearby view points.**

19

Pedestrian Amenities and Streetscape

Particularly in dense urban settings, the streetscape is often the primary pedestrian amenity and has a significant influence in creating a "pedestrian friendly" environment. Alley vacations are an issue and have an impact, particularly in residential areas and for pedestrian environment. **The Final EIS should include a more detailed discussion of the impact of alley vacations in these areas.**

20

In calling for more housing and employment density, the proposed changes in the Land Use Policies the DEIS should address the public benefit that should be derived from increasing the allowable height and density. This should include, at a minimum, creating a healthy and attractive pedestrian streetscape environment, providing community centers, schools, and other public and private services that are typical of urban centers. The Commission notes that the Denny Triangle is an area where the pedestrian environment will be shaped significantly by future development. This calls for clear guidance for development and how it can help create this pedestrian environment. **The Final EIS should contain a discussion of tools that might be explored to leverage resources to provide these services and amenities with the development as it is occurring.**

21

Parks and Open Space

The Planning Commission has long held the position that the City needs to commit to providing more parks and open space in the downtown area as the residential population increases. If the City really wants livable residential communities, open space must be treated as more than making the streets attractive. Particularly if the City does decide to double the target for the downtown residential population, it must make a serious commitment to adding open space for what would become the region's densest urban center. This should be considered as part of the public benefits that must be achieved with increased density and development.

The DEIS alternatives do not adequately address open space demands and needs of the projected residential population that would be permitted under these scenarios. While it does acknowledge that current and project open space will not meet the projected needs, it fails to identify in detail reasonable open space needs. If families are encouraged to live downtown, then recreational facilities and active open spaces will be needed to serve children.

22

In the Final EIS this section should be expanded to identify and assess more innovative and creative ways of providing open space and of mitigating open space impacts that would (or might) result from the various alternatives. This should include a more detailed analysis of the types of open space, parks and recreational facilities that are needed if more families live downtown and how these needs could be met through existing and new resources.

Finally, the DEIS does not analyze the effect of eliminating or reducing use of the TDC in providing resources for open space in the region as well as part of TDC developments. **The Final EIS should address this more explicitly.**

23

Views and Aesthetics

Views and visual aesthetics are important issues in downtown Seattle, with designated view corridors as well as many opportunities for glimpses of both near and distant vistas. **The Final EIS should include a**

24

more detailed analysis of the notion of visual open space (e.g. through taller, slimmer buildings) and ways to get more effective use of both public and private open space associated with developments. This will be critical to successfully achieving a livable residential environment in the downtown area.

24

Energy

The DEIS states that a new substation serving downtown needs to be energized by 2012, in order to provide for a service need date of 2015. The realistic likelihood of that happening in anticipation of future growth needs to be assessed (versus being built in response to actual development demand). The DEIS also references a new capacity plan to be prepared by the end of 2004 – how this will be incorporated into the Final EIS should be addressed.

25

The Final EIS needs to provide a more detailed assessment of infrastructure issues that result from these changes to more development capacity. What additional upgrades would be necessary or likely? This should include impacts on water and sewer system, both of which are aging systems in much of downtown and adjacent old neighborhoods. This assessment also needs to address funding to meet these needs.

26

Transportation

The Final EIS needs to address the implications of adding significant residential population to the downtown core, with a specific focus on assumptions about auto ownership and travel behavior of both future residents and workers (including the rationale for such assumptions.

27

The Final EIS should also address the potential impacts on local transportation of alley vacations in the Denny Triangle area and other areas where significant development is anticipated, within the context of projected traffic increases due to the increased residential and employment populations.

28

Parking

The DEIS does a good job of describing current conditions, projected changes in supply and demand. The underlying assumption is that given this is the downtown core, the goal is to reduce demand for commuter parking, rather than trying to meet potential demand. Impact mitigation is described in less detail, but does seem to cover the range of strategies for reducing demand and allowing the market to address adding to the supply of parking.

29

What is not addressed is the physical design and street environment impacts of structured parking, particularly if it is not screened at street level. The Final EIS should address the impacts of above grade parking, particularly at the ground-floor level. Consideration should be given to requiring all such structures to have street-front retail/commercial uses.

Concluding Comments

We urge you to address these issues and concerns in the Final EIS, and to expand it as necessary to more clearly articulate and address the implications of the Mayor's proposal for even more density. We also

30

Seattle Planning Commission
03/01/04
Page 7

encourage you to more explicitly address in the Final EIS how this more limited focus on height and density fits into the larger Center City focus as it takes shape.

The Planning Commission looks forward to continuing to work with DPD and the community in moving forward with alternatives that find the appropriate balance between the important goals of concentrating density in our center city and ensuring that this area is a safe, attractive and exciting place to live and work. Please don't hesitate to contact us if you have questions or wish to further discuss our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "John Owen".

John Owen
Chair

CC:
Diane Sugimura, DPD
John Rahaim, DPD

30

Belltown Housing and Land Use Subcommittee

January 13, 2004

Gordon Clowers
Department of Planning and Development
City of Seattle
700 5th Avenue, Suite 2000
Seattle, WA 98104

Subject: Downtown Height and Density Study

Dear Mr. Clowers:

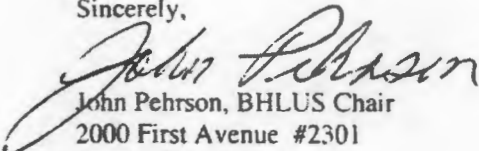
I am writing on behalf of the Belltown Housing and Land Use Subcommittee (BHLUS) of the Belltown Community Council on the Draft Environmental Impact Statement for the subject study. We took a position on this study in our letter dated 2/11/02 to Mary Jean Ryan (which is attached) and want to reiterate that position now.

The bulk and scale allowable for residential use by the DMC-240 zoning in south Belltown is a great concern to us. Changing that to DMR/C-240 as proposed in Alternative #3 is consistent with the rest of Belltown and is recommended. Further, we believe that the zoning restrictions of DMR/C-240 that result in a "wedding cake" design are overly constraining. We would welcome more latitude for the building architects and the design review board, while maintaining limits on upper level bulk and scale, and would be pleased to work with you on these matters.

As outlined in the reference letter, we would oppose vigorously the application of the Alternative #1 to south Belltown. This alternative increases the allowable bulk and scale of residential developments that is totally out of keeping with our neighborhood. The changes for south Belltown in Alternative #1 were not requested by our Belltown Neighborhood Plan or the plan of the Downtown Urban Center Planning Group.

We have appreciated the opportunity to work with you and Dennis Meier on these issues over the past 2 years. You have been very helpful and responsive to our questions.

Sincerely,


John Pehrson, BHLUS Chair
2000 First Avenue #2301
Seattle, WA 98121
206-441-9913
pehrsonj@halcyon.com

cc: Honorable Greg Nickels, Mayor, City of Seattle
Honorable Jan Drago, President, Seattle City Council
Honorable Peter Steinbrueck, Chair of Land Use and Planning Committee
Diane Sugimura, Director, Department of Planning and Development
John Rahaim, Director of Planning
Dennis Meier, Department of Planning and Development

Jhp 1/10/04

Belldtown Housing and Land Use Subcommittee

c/o John Lombard, Chair
2415 Second Avenue, #733
Seattle, WA 98121

February 11, 2002

Ms. Mary Jean Ryan
Director, Strategic Planning Office
City of Seattle
600 Fourth Avenue, Room 300
Seattle, WA 98104

RE: Phase II Amendments to Downtown Development Regulations

Dear Ms. Ryan:

On behalf of the Belldtown Community Council and its Housing and Land Use Subcommittee, I am writing to communicate our unanimous recommendations on the second phase of amendments to development regulations for downtown.

We support changing the Downtown Mixed Commercial (DMC) zone in the southeast portion of Belldtown To Downtown Mixed Residential/Commercial (DMR/C), as proposed in Alternative 3 ("Residential Emphasis") in the Draft Environmental Impact Statement (DEIS) for the proposed amendments. We would like the city to explore extending this proposed change to all of the DMC zone in this part of Belldtown. (Alternative 3 would apply it from Virginia to Lenora from 1st to 3rd Avenues, and between Virginia and Blanchard on 4th and 5th Avenues. The extension we propose would also include 2nd Avenue and the east side of 1st Avenue from Virginia to Stewart.)

This action would decrease the maximum floor-to-area ratio (FAR) for commercial development from seven to five in this part of the DMC zone. Even more important, it would reduce the physical bulk of residential developments there--lot coverage would be restricted by progressively greater amounts at heights of 65, 85, 125 and 240 feet. Successful high-density residential neighborhoods need access to light and space, which are lost when high-rise buildings are allowed to cover entire lots with no setbacks or variation, as can be seen in recent developments along Western Avenue. Without the DMR/C zoning, new residential developments could build to the maximum allowable height in southeastern Belldtown with only limited restrictions on bulk, since residential use is not subject to the FAR limit. In addition to restricting lot coverage, we believe the city should explore creating incentives for more slender residential high-rises downtown, perhaps similar to those it recently established for commercial buildings.

We strongly oppose the change that is proposed in Alternative 1 in the DEIS ("High End Height and Density Increases") for this same part of the DMC zone in southeastern Belldtown. This alternative would increase the maximum floor-to-area ratio for commercial development from seven to ten and the maximum height of developments

from 240 to 312 feet in this zone. This proposal is contrary to the goal of the city, the Belltown Community Council and the Belltown Neighborhood Plan to make Belltown an attractive location for the greatest concentration of residents in Seattle. It would exaggerate the problems with the existing DMC zone described above. It was not proposed by the Downtown Urban Center Planning Group or any other citizen body. It was included by city staff in Alternative 1 in the DEIS to test the impacts of maximum increases in height and density across all of the zones that might have changes proposed in the second phase of amendments to the downtown development regulations. We would fight any such proposed change for Belltown.

2

We recognize that there are potential advantages to increasing the allowable height and density of developments in the downtown core and parts of the Denny Triangle, particularly as a means of increasing incentives to support affordable housing, open space and landmark preservation in the downtown area. We support that goal. Our comments are targeted only to the part of the proposed amendments that would apply within the boundaries of Belltown, as defined in our neighborhood plan.

3

Thank you for the opportunity to comment on the DEIS. We would especially like to thank Dennis Meier of your office for attending two meetings of the Belltown Housing and Land Use Subcommittee (BHLUS) to discuss the alternatives in the DEIS and how they might affect Belltown. Dennis was consistently helpful, fair and professional in all of his interactions with us. If you have any questions about this letter, please contact John Lombard, at (206) 256-1508 or jlombard2415@earthlink.net, through February, or John Pehrson, at (206) 441-9913 or pehrsonj@halcyon.com, after February.

Sincerely,

Original signed by

John Lombard
Chair, BHLUS

Members:

Joan Algarin
Karen Anderson-Bittenbender
Mark Baerwaldt
Zander Batchelder
Dick Cleveland
Julia Decruz
Sylvia Fisher
Carolyn Geise

Valerie Heide Mudra
Sarah Lewontin
Jerry Jordheim
John Pehrson
Barbara Sheldon
Blaine Weber
Hal Weeks

cc: Honorable Greg Nickels, Mayor, City of Seattle
Honorable Peter Steinbruck, Chair, Seattle City Council
Honorable Judy Nicastro, Chair, Land Use Committee
Honorable Nick Licata, Chair, Neighborhoods, Arts and Civil Rights Committee
Honorable Richard McIver, Chair, Housing, Human Services and Community Development Committee

DENNY TRIANGLE NEIGHBORHOOD ASSOCIATION

February 27, 2004

Ms. Diane Sugimura, Director
Department of Planning & Development
City of Seattle
700 Fifth Avenue, Suite 2000
Seattle, Washington 98104-5070

DEPARTMENT OF DESIGN
CONSTRUCTION AND LAND USE

FEB 27 2004

RECEIVED

Re: Downtown Height and Density Draft EIS

Dear Ms. Sugimura:

We are writing to provide general comments on the Downtown Height and Density Draft Environmental Impact Statement ("DEIS").

As you are probably aware, the Denny Triangle Plan was completed in 1998 and approved by City Council in 1999. The Denny Triangle Neighborhood will help the City of Seattle achieve its growth targets, set at the time of planning, of 23,000 new jobs and 3,778 new housing units by 2014.

The Denny Triangle Plan's top priority is to change the zoning and bonus system to allow for significant increases of height and density. The Denny Triangle represents the largest developable area for office expansion in downtown Seattle and as such, the Denny Triangle DOC 2 zone is intended to take the higher, taller office buildings and DMC zones are for commercial mixed-use buildings. Our goal is clearly stated. We seek to increase the commercial development capacity and attract commercial development to the Denny Triangle and leverage it to create moderate and low-moderate income level housing and open space.

The Denny Triangle Plan also calls for reducing or relaxing upper level setback requirements in order to avoid the proliferation of bulky "wedding cake" shaped buildings. The plan was carefully crafted and balanced so that employment expansion will be achieved while also creating the resources for affordable housing and open space. The increased height and density allows for better utilization of land so that City is assured of achieving all of its goals for jobs, housing and open space without risk of realizing just one of those goals at the expense of another.

1

The Denny Triangle has worked with the City in good faith and waited a long time for its plan to be implemented. In 2001, the downtown TDR and Bonus program was amended as "Phase One" of a 2-phased plan. Phase One included changing previously bonusable items to requirements and it was agreed that the cost of housing bonus and TDR would be raised from approximately \$13 to \$22 per buildable square foot. In exchange for these changes (increased costs to development), the City promised that the Downtown Urban Center Planning Group's (DUCPG's) Plan and Denny Triangle Plan to increase the height and density would be implemented as Phase 2. Unfortunately, in these interim couple of years, we not only missed the opportunities that come with a good, strong economic cycle but by having only the Phase One amendments to the Bonus & TDR provisions implemented, this has actually served as a material disincentive to development. **The Denny Triangle Plan needs to be implemented this year!**

2

The Final EIS should consider greater height and density. We recognize that the DEIS Alternative #1 was drafted as a composite plan. It doesn't clearly represent the Denny Triangle Plan and the DUCPG or downtown plan. Given that fact, and given the changes that have occurred in our City with the passage of time, the EIS should consider greater height and density. Current height and density restrictions unwisely restrict opportunities to guide the development where it is desired and restricts opportunities for additional housing and open space. The increased height limits will allow for office uses contemplated by the Comp Plan and bring about taller, thinner buildings. The Denny Triangle has always been intended to accommodate future employment growth and is envisioned to be a commercial district that includes residential. Increasing height and density promotes more efficient office buildings as well as mixed-use projects that could include combinations of uses such as office, residential, retail and open space. Additionally, the EIS needs to investigate greater height and density in order to make the best use of the investments in mass transit. None of the alternatives offer adequate density to support the new public transportation projects and this just doesn't make sense given the enormous investment being made on transportation.

3

The EIS should address changes to the current setback requirements. The Denny Triangle seeks changes that will allow for greater design flexibility as it relates to upper level setbacks. Current requirements add costs and result in bulky, "look-alike" buildings that aren't pedestrian friendly or in keeping with an exciting urban environment.

4

The Denny Triangle opposes Alternative #2 as this alternative runs counter to the Neighborhood's Plan and risks squandering the City's and Denny Triangle's ability to realize its potential to achieve future employment and housing goals.

5

The Denny Triangle strongly opposes Alternative #3. This alternative constitutes a downzone. This is diametrically opposed to The Denny Triangle Plan and the DUCPG Plan. The City cannot afford to lose the employment that comes with the commercial development potential in our neighborhood and the significant housing resources that are generated from the commercial development.

6

In summary, the Final EIS should honor the neighborhood plans and planning process. There has been and remains unprecedented consensus for implementing the increased height and density and other components as set forth in the Denny Triangle and DUCPG Plans. The height and density increases need to happen now so we are prepared for the next economic cycle. It is important to note that the Denny Triangle Neighborhood is on record as having stated its support of the TDC program as being conditional to implementing the Triangle's Plan. The TDC program has not been used and may never be used. The Denny Triangle Neighborhood's support was strictly subject to that program not preventing, interfering or delaying, in any way, with the implementation of the Denny Triangle's plan for increasing height and density. We want the existing TDC Plan eliminated and the Denny Triangle Plan implemented.

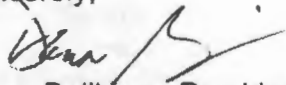
7

The Denny Triangle embraces density and wants new jobs and affordable housing for downtown. Years of thoughtful, deliberate effort went into drafting the Plan and into making recommendations for bonuses and TDR's to ensure consistency with the Comp Plan and Growth Management Act. We actively participated in the collaborative planning efforts between the City, the Downtown Urban Center Planning Group, and the Advisory Committee and have remained faithful stewards of the Triangle and DUCPG Plans. We ask the City keep faith with the Neighborhood Plans and to be bold and innovative in considering how best to increase the height and density in Downtown without being limited to what has been identified in Alternative #1 in the DEIS.

8

Thank you for your consideration.

Sincerely,



Dana Bollinger, President
Denny Triangle Neighborhood Association

Cc: Denny Triangle Neighborhood Association Board of Directors



*Mission Statement:
To champion a healthy, vibrant urban core.*

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Downtown Seattle Association

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January 29, 2004

Diane Sugimura, Director
City of Seattle Department of Planning and Development
700 Fifth Avenue, Suite 2000
Seattle, 98104

RECEIVED
FEB 02 2004

Dept. of Design
Construction & Land Use

Dear Ms. Sugimura,

Thank you for the opportunity to respond to the Downtown Height and Density Study, Draft Environmental Impact Statement.

In general, we do not feel that the DEIS options went far enough to meet the neighborhoods' vision for high quality, dense, urban Downtown neighborhoods. In particular, since completing the Downtown Urban Center Plan in 1998, there have been significant changes in Downtown and the economy. The neighborhoods and community have been discussing new ideas and goals, with a bigger vision for the Center City. This vision was expressed at the "Thinking Boldly About the Future" Forum sponsored by the Mayor in November. We are concerned that because this DEIS is responding to 1998 conditions, it will become an obstacle to achieving our goals for our neighborhoods.

One of the most interesting changes since 1998 is the growing emergence of the concept of the "urban center", a collection of unique urban neighborhoods that stretches from South Lake Union to South Downtown. Recently we have seen projects in South Lake Union start construction, and the development of innovative new ideas for South Downtown. In addition, many developers and policy makers are examining Vancouver B.C.'s development policies to see what we might apply here in Seattle.

Probably the biggest change is the billions of dollars in new transportation investments for Downtown, including light rail, heavy rail, streetcar, monorail and the Viaduct. To take full advantage of these investments, we need to develop a new and bigger vision for the growth of Downtown.

When the five Downtown neighborhoods collaborated in 1998 on the Downtown Urban Center Plan, we structured our plan to accommodate the estimated growth allocation numbers we received from the City. The growth allocations that were the basis for our plan were just that—allocations. They were based on regional growth we thought we might get, not on the growth we wanted to attract in order to keep Downtown a vibrant, urban place. At the time, we all discussed that we would like to see greater density than we

were required to accommodate by the City in some neighborhoods, particularly Denny Triangle.

Our vision for Downtown was to be more like Vancouver, which is now home to 100,000 residents, compared to our current 20,000. We also viewed Downtown as a growing center for employment, which supports growth management goals and protects Seattle neighborhoods from unwanted and inappropriate commercial development.

2

The neighborhoods and DSA still strongly support the original Downtown Urban Center Plan priorities for housing (particularly affordable housing) and job growth. We still strongly believe that regional job growth should be focused in Downtown to reduce sprawl. The reality is that Downtown will always be more expensive to develop than a green field, so if we want the development, we will have to be proactive and offer incentives, as envisioned in the plan.

Finally, given all the recent positive community discussion about density, it is very concerning to see high-density development in the DEIS equated to a poor quality pedestrian environment. Some of the best pedestrian environments in the world are in dense urban areas, and this is the vision the DUCPG group had when making its plan. In addition, the so-called "maximum growth" option is labeled as the worst-case scenario—yes, this is the technical term, but used in this context implies that growth is bad.

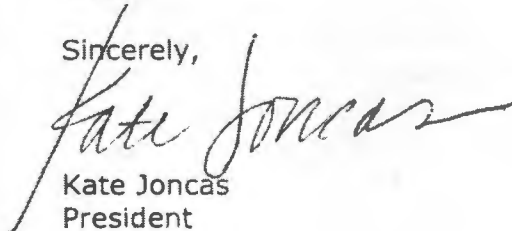
3

We propose that the City consider a two-pronged approach to moving forward. It is clear that new options to encourage appropriate growth are needed, and that development of some of these options is beyond the scope of this DEIS. DSA would like to partner with the City to explore some new ideas.

4

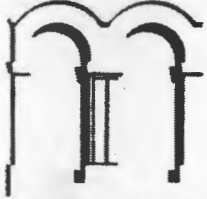
Second, we encourage City staff to be creative; to see what we can do within the framework of the options identified in this DEIS to increase height and density in Downtown beyond what is currently identified. The neighborhoods are anxious to develop new tools to help us move into the future.

Sincerely,



Kate Joncas
President

HISTORIC SEATTLE



DEDICATED TO
ARCHITECTURAL
PRESERVATION

PRESERVATION DEVELOPMENT
AUTHORITY

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JOHN CHANEY, EXECUTIVE
DIRECTOR

HISTORIC SEATTLE FOUNDATION

MICHAEL HERSCHENSOHN
CHAIR

STEVE ARAI

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JAMES FEARN

GARY GAFFNER

MARIE STRONG

PAMELA ZYTNIICKI

February 26, 2004

Gordon Clowers
Department of Planning and Development
700 5th Avenue, Suite 2000
Seattle, WA 98104-5070

RE: DEIS on Height and Density Changes in Downtown Seattle

by facsimile and mail

Dear Mr. Clowers,

Historic Seattle, chartered by the City of Seattle in 1974 to preserve our city's built heritage, wishes to provide comments on the draft environmental impact statement addressing potential height and density changes downtown generated by your office.

While Historic Seattle, and the preservation community nationwide, have embraced increased urban density as an antidote to sprawl and a number of other highly significant issues, we are concerned that this investigation of impacts be as thorough as possible. We ask that the historic resources potentially impacted by alterations in current zoning are properly recognized within your investigation.

The current list of potential landmarks should be expanded to include information gathered through the environmental impact study process generated by a number of projects downtown. Historic Seattle volunteers and staff have assembled the attached list of potentially eligible landmark buildings and districts mentioned in EIS documents. Please add these to the list of potentially eligible properties within the commercial core, Belltown, and the Denny Triangle area already mentioned in your document.

Also, raising height and density limits downtown will, of course, place even more pressure on owners of landmark and potential landmark buildings to maximize the economic opportunities of the site through demolition and new construction. While this is already a threat in most any part of Seattle where the zoning envelop exceeds the height and density of existing older structures, the economic benefits of teardowns are highest within your study area.

1

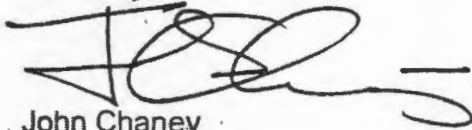
2

Incentives to offset the gap between rehabilitation projects and new construction need to work especially well within this zone. As a part of the mitigation for changes in zoning downtown that intensify existing pressure to demolish, the Transfer of Development Rights program, which was altered in 2001, should better provide funding for rehabilitation projects. The current percentage of TDR funds (no more than 25% of credits generated through this program) may be inadequate to offset impacts.

2

We thank you for the opportunity to comment on this study, and as always, are open and willing to contribute to any discussion related to our historic built environment.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Chaney', written over a horizontal line.

John Chaney
Executive Director

**Additional downtown area buildings that are potentially significant and are not
City of Seattle Landmarks**

Baillaergeon	1200 Second Avenue	
Catholic Seamen's Club	2330 First Avenue	
Centennial Building	1900 Fourth Avenue	
Central Building	810 Third Avenue	
Chamber of Commerce	215 Columbia Street	
Compton Lumber	2315 Western Avenue	
Davenport Apartments	420 Vine Street	
Devonshire Apartments	420 Wall Street	
Diller Hotel/Porter-Davis	1220 First Avenue	
Fifth Avenue Court	2132 Fifth Avenue	
Foster and Marshall	720 Second Avenue	
IBM Building	1200 Fifth Avenue	
Labor Temple	2800 First Avenue	
Lexington-concord Apts.	2402 Second Avenue	
Lewiston Hotel	2205 First Avenue	
Lyon Building	607 Third Avenue	(NRHP listed)
Maritime Building	911 Western Avenue	
Mayflower Park	405 Olive Way	
Medical Dental Building	509 Olive Way	
MGM/Blu Canary	2331 Second Avenue	
Norton Building	801 Second Avenue	
Old Spaghetti Factory	2800 Elliott Avenue	
Pacific Lincoln-Mercury	601 Westlake Avenue North	
Pacific Telephone & Telegraph		

Pathe	2325 3rd Avenue
Rainier Tower	1301 Fifth Avenue
Rivoli Apts.	2127 Second Avenue
Roq la Rue Gallery	2312 Second Avenue
Scargo	2205 First Avenue
Seattle Trust	804 Second Avenue
Second & Pike Building	
Securities Building	1904 Third Avenue
Skyway Luggage	2501 Elliott Avenue
Terminal Sales Annex	1931 Second Ave
Two Bells Tavern	2315 Fourth Avenue
Union Livery Stable	2200 Western Avenue
University Women's Club	1105 Sixth Avenue
Vance Building	1402 Third Avenue
William Tell Hotel	2327 Second Avenue
Woolworth's	1418 Third Avenue
YWCA	1201 Third Avenue

Numerous hotels and apartment buildings, especially in Belltown.



THE LEAGUE OF WOMEN VOTERS OF SEATTLE

Statement for the Public Hearing February 24, 2004, on the Draft Environmental Impact Statement on Downtown Height and Density Changes published by the City of Seattle Department of Planning and Development November 2003

The League of Women Voters of Seattle has studied and acted on downtown land use issues for over 20 years. We were actively involved in the development of the Downtown Plan adopted in 1985 and in the City's 1994 Comprehensive Plan. We continue to follow the City's land use plans and regulations with an eye to preserving and enhancing our vision of a most livable city. We offer the following comments on the Downtown Height and Density Changes Draft EIS prepared by the Department of Planning and Development:

Relationship of Proposed Changes to the Growth Management Act and City of Seattle Comprehensive Plan

The League of Women Voters of Seattle acknowledges and endorses the state and city goals of directing growth to urban areas, reducing sprawl, and accommodating increased density of commercial and residential buildings in the study area of downtown Seattle. We learn from the DEIS that current zoning—Alternative 4—is adequate to accommodate the employment and residential growth projected through the year 2014 under the Comprehensive Plan adopted in 1994. We question whether substantial changes in zoning, such as those proposed in Alternatives 1, 2, and 3, should be undertaken before the Comprehensive Plan is thoroughly reviewed and updated to address the following 20 years from 2014 through 2034.

Major changes are underway in areas close to the study area such as the waterfront, port properties in North Bay, the SODO area, South Lake Union and the East Pine/Pike and Madison areas. A broader look at the entire downtown and the nearby areas cited above should be undertaken as part of the required, once-a-decade review of the City Comprehensive Plan. These other areas could provide opportunities for residential growth, including affordable housing. Their residents could work downtown, provided that good public transportation is available.

Major transportation projects like the Viaduct/Waterfront plan, the monorail, and the bus tunnel closure for light rail should be reviewed for their impacts on the study area, and all of downtown, before substantial changes are made in downtown zoning.

Changes Recommended by Downtown Neighborhood Plans

Many of the changes in zoning, height limits and bonuses recommended by downtown neighborhood plans have already been addressed by the City and were adopted in 1999 and in 2001. It may be premature to change the rules substantially again before we know how the recent changes are working. We question the elimination of the Transfer of Development Credits program under Alternative 1. This program has the potential to

encourage residential development and provide funds for amenities in the Denny Triangle.

2

Areas Needing More Thorough Analysis of Impacts and Possible Mitigation Strategies in the Final EIS:

Housing

The League supports the goal of increasing the amount of housing in the study area. Table 25, "Downtown Development Scenario 2000-2020," projects the number of potential residential units under each alternative. We see that the totals for all four alternatives are quite similar, ranging from 7,315 under Alternative 4 (no action) to 7,640 under Alternative 2. We question the tradeoff of a few more residential units for the substantial increases in height and density proposed in Alternatives 1, 2, and 3.

3

We urge that the Final EIS include a more thorough review of the possible mitigation strategies listed on page 3-28, because we recognize that the challenge of finding funding for low-income and affordable housing in the study area will be great under all four of the alternatives. Current incentives fall short of meeting the real financial costs of creating low-income and affordable housing downtown. More attention should be given to meeting the housing and service needs of families with children who do or might live downtown.

4

The rezone proposed in Alternative 3 to DMR/C for a Residential Mixed Use Area with reductions in FAR looks promising and should be reviewed more intensively in the Final EIS. We support some clustering of residential uses in order to provide more of a feeling of living in a neighborhood. In addition, we propose that the Final EIS include a review of a new provision for limiting the density of residential buildings in the study area

5

Height, Bulk and Scale

The Comprehensive Plan's goals and policies for the Downtown place a special emphasis on the quality of the pedestrian environment. The increases in height and bulk proposed in Alternatives 1 and 2 (and in Alternative 3 for the Commercial Core) would negatively affect the pedestrian experience with taller, bulkier buildings towering over the narrow streets and sidewalks in the study area. The Final EIS should more thoroughly review these negative impacts. Do the tradeoffs of increased space for jobs and housing outweigh the negative impacts on the pedestrian experience, on aesthetics and ultimately on the livability of the city?

6

The League supports zoning and policies included in the 1985 Downtown plan that require a smooth transition in scale and density of development from areas of greatest height and density to areas of lower height and density. Alternative 1 includes unacceptably abrupt increases in height, bulk and scale along the edges of sensitive transition areas.

7

Open Space and Parks

This Draft EIS exposes the current and future inadequacies in the amount of open space and parks available to residents and employees in the study area under all of the

8

alternatives. The Final EIS should explore the "other possible mitigation strategies" outlined on page 3-125. Since the likelihood of adding major open space in the study area in the foreseeable future seems remote, attention should be given to improving the pedestrian connections between downtown and nearby major open spaces, such as the waterfront, the Seattle Center and South Lake Union. Increasing height and density without significantly addressing the already inadequate amount of open space in the study area is not acceptable.

8

Thank you for this opportunity to present the comments of the League of Women Voters of Seattle.

Presented by Nancy Bagley
Past President



February 26, 2004

Dennis Meier
Seattle Department of Planning and Development
City of Seattle
700 Fifth Avenue, Suite 2000
Seattle, WA 98104-5070

RE: Downtown Height and Density Changes DEIS

To Dennis Meier:

Thank you for the opportunity to comment on the Downtown Height and Density Changes Draft Environmental Impact Statement, dated November 2003. Following are our specific comments:

1. While we support the idea of concentrating growth in the core of the city to reduce sprawl, traffic congestion and other negative environmental impacts, we strongly feel that new development in downtown must result in an increase rather than a reduction of open space, especially green space. We applaud the city's effort to follow the Vancouver, B.C. model of creating a livable, walkable and dense downtown but note that only half of the equation is implemented by the DEIS alternatives. Open space for public enjoyment and livability is integral to the success of Vancouver and will be equally important for Seattle. Even more crucial is green space. Green space will improve the downtown habitat base (terrestrial insects, birds, etc.), cleanse and reduce stormwater flows to the existing Combine Sewer System, as well as provide clean flows to Elliott Bay from surface water runoff and reduce the heat island effect in the concrete built environment. The city should include incentives or requirements for green roofs, green infiltration strips around buildings, as well as porous pavement, and "leaky stormdrains." Instead of reducing open space as a result of zoning changes, the City must ensure a significant increase in open and green space.

2. Open space calculations for residents in downtown, in the DEIS, are based on "thousands of households." We feel that the calculation should instead be based on "thousands of residents," which would put the standard inline with open space and parkland targets for other cities. If the downtown open spaces are calculated on a "per 1000 residents" basis, the City is seriously lacking in public open space under current conditions. Further, if the population of downtown doubles in the next 20 years from 33,000 to 66,000, then open space, and especially green space must also double, at a minimum.

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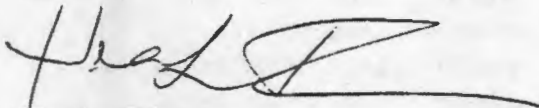
3. The DEIS does not adequately address stormwater treatment as part of the rezoning strategy. Existing stormwater regulations encourage reduction of flows to the stormdrain system in order to prevent combined sewer overflows into Elliott Bay. We encourage much more emphasis on on-site retention and treatment of stormwater, through the use of green roofs, infiltration strips, porous pavement, reuse and other methods. If buildings are allowed to become even bulkier and larger in scale, and local populations are increased, then provision needs to be made (as part of this EIS process) to reduce the environmental impacts of contaminated stormwater from these densely populated urban areas. West Point and other treatment facilities do not adequately treat toxins in stormwater – infiltration and other engineered solutions on-site will.

3

We need more open space and green space for our residents and for the health of Elliott Bay and Lake Union.

If you have any questions, please contact me at (206) 382-7007 X215. Thank you for your consideration of our comments in the EIS process.

Sincerely,



Heather Trim
Elliott Bay Project Coordinator

January 30, 2004

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Ms. Diane Sugimura, Director
Department of Planning and Development
City of Seattle
700 Fifth Avenue, Suite 2000
Seattle, WA 98104

Dear Ms Sugimura:

Thank you for the opportunity to comment on the City of Seattle's Downtown Height and Density Changes Draft Environmental Impact Statement (DEIS). We applaud the city for the time and energy that have gone into development of this analysis. The Growth Management Act (GMA) encourages residential and employment growth in urban areas, and we feel that increasing heights and densities in downtown Seattle could assist that goal. We especially support:

- The level of detailed analysis that went into this DEIS. We applaud you for the thoroughness of this work, identifying potential impacts as well as mitigation strategies. The development of four alternatives and the detailed comparison between them is very useful in understanding the complexity of the issues involved.
- The development of mitigation strategies in this DEIS provides a range of ways to decrease potential impacts of this proposed increase in development. These strategies are well thought out and will be essential to maintaining the existing character of downtown Seattle in spite of increased development.
- The forward thinking of this development proposal to allow increased development in downtown Seattle. The GMA encourages development in urban areas that provides a mix of housing for all income levels, adequate transportation and economic development consistent with planning. This DEIS has done an exemplary job of examining the potential benefits and impacts of each alternative on housing, transportation and land use.

As you move forward with this process and select a preferred alternative, we have a few concerns that we encourage you to consider. Our concerns are as follows.

- The DEIS is fairly clear about the potential loss of affordable housing stock and potential loss of opportunity to build additional affordable housing. We urge you to ensure the preservation of existing affordable housing and implement zoning, financing tools and other incentives to provide additional affordable housing for all income levels in downtown Seattle.
- We encourage you to select an alternative that provides for a substantial residential element in the downtown area. A mix of housing and employment is important to provide for a vibrant and mixed-use center that will continue to make Seattle a wonderful city. Maintaining existing residential character is

essential, and the use of rezones to promote residential uses in some locations could be beneficial as mitigation to the proposed increases in commercial bulk.

- We encourage the implementation of design standards that will ensure pedestrian amenities and pedestrian-scale design to help mitigate the increase in bulk and scale of development in downtown Seattle. As an example of this issue, the DEIS identifies minimal development standards for the enhancement of pedestrian amenities in the Denny area as a potential problem that could lead to the development of a primarily commercial district.
- The DEIS identifies traffic as a problem in the study area that will increase with more intense development. We encourage the implementation of transportation mitigation strategies in conjunction with new development to reduce the impacts. We applaud the development of detailed transportation demand management strategies as part of the DEIS and encourage their implementation. Providing for more housing downtown will help mitigate the additional traffic.
- The potential loss of some parking has been identified as an impact of all of the alternatives. We support the mitigation strategy to reduce the minimum and maximum parking requirement in the study area. This tactic would allow demand to create the necessary amount of parking rather than providing unnecessary supply and would encourage the use of transit and carpooling.
- All of the alternatives, including the do nothing alternative, identify the amount of open space as inadequate with the goals of the GMA. We encourage the implementation of a requirement that developers provide public open space, which could be in the form of a pocket park, atrium or rooftop garden, among other alternatives. Intense development is most likely the best use of land in the study area, but open space can exist in unusual forms and even within buildings.

Thanks to the city staff for all of your hard work on this proposal. We support moving forward with the process of identifying a preferred alternative for the proposed change in height and density limits for downtown Seattle. We encourage the balancing of residential and employment growth in the city, as it currently is the largest employment center but also consists of many important residential centers as well. We believe that adoption of the increased height and density limits, with the right mitigation strategies, will provide for positive, well-planned growth in Seattle and the region.

If you have any questions, please feel free to contact Sydney McComas or Tim Trohimovich both at (206)343-0681 or e-mail: sydney@1000friends.org or tim@1000friends.org.

Sincerely,

Sydney McComas
Urban Policy Advocate

Gordon Clowers - Downtown EIS

From: "Michael Baker" <michael@bobcanhelp.com>
 To: <gordon.clowers@seattle.gov>
 Date: 2/25/2004 4:31 PM
 Subject: Downtown EIS

Hello Gordon,

I was at the public review meeting last night, Feb. 24, and after reflecting on the process, I wanted to pass along a few observations.

I occasionally attend these kinds of meetings because of a professional interest in business and sustainability, though I do live in Seattle, also, and am invested in its growth as a resident.

My experience with the city meetings I've been to, as meetings, has been mixed. I'm glad to see that the city is reaching out to involve citizens in its process, but in general the presentations suffer from a lack of clarity, in scope and in goals. Generally, the public is promised that their "input" will be weighed, but the weighing mechanism is rarely in view. Further work on defining the scope of a meeting, and the specific goals of the meeting itself (rather than that of the whole process), would be helpful.

To take last night as an example: I arrived about 15 minutes late, and apparently I missed the primer presentation on the jargon that would be used throughout by various speakers. I know many of the people there were, of course, familiar with FAR ratios and their relationship to building height, but I was not. I had to go back and study up, which I'm happy to do. It's just a point of courtesy, generally, not to speak publicly in acronyms.

To begin from the beginning, there was a booster intro from a real estate professional, and then Diane quoted the Mayor at some length, and then the discussion began in earnest. The speaker largely referred, in illustrating the difference between alternatives, to maps on foam core that were useless to anyone more than 10 ft. away. I gathered that our discussion was going to revolve around two factors: FAR numbers and height increases. At no point were these numbers placed in context, so that the listener could visualize the relative baselines of density/height (though Portland and Vancouver were frequently cited as examples, numbers weren't connected to either). Further, increases in height were not linked, for clarity, to mention of the existing height limits.

Context is terribly important in communicating meaningfully. As we were being asked for input on these two factors, specifically, I was wondering what the baselines are. I mean, apparently these are the primary drivers in managing growth. What are the extremes, for example, of height/density? What is clearly an option to shy away from: You don't want to look like Hong Kong, do you? What height/density ratios have come to signify a city of a certain size? What are the ratios for cities known for vibrant downtowns?

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Also, some forms of communication just communicate better. A discussion of percentage-height-increase needs a visual model to illustrate the change in the skyline from a few viewpoints.

At the point that I left, the speaker had just asked us whether we preferred mixed office/residential development or residential enclaves. Again, this seemed to lack context. I mean, I "prefer" to be wealthy and drive an electric Maserati. I'm no engineer, but it seemed to me that development of specific areas for specific purposes would require different support infrastructure that would weigh for or against the feasibility of a project. Building residential enclaves, for instance, would seem to offer economies of scale, and opportunities for clustering infrastructural support. However, I imagine that's open to debate, which I didn't hear any of.

It struck me as really very peculiar that the cost/benefit ratios to these decisions were not being overtly discussed, and from the relevant viewpoints. I welcome hearing what developers' think is feasible, in conjunction with the opinions of advocates for low income housing.

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All I really heard were the usual representatives saying the usual things, based upon their interests, and not interacting meaningfully. The presenters, meanwhile, had little data, or meaningfully presented data, to offer us in distinguishing between Alternatives #1 - #4. After all, why stop at an extra 100' in height? Why not give Mr. Selig

credit for foresightedness and establish a 950' ceiling? Clearly there are parameters being set, but I was not informed of the reasons for these parameters. Do metropolitan residents demand more height? Do developers make that much more money? Is it simply a question of meeting limited geographic area?

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In sustainability, we're asked to consider what we want, what the specific desired outcome is, and backcast from there. I don't get the sense that this EIS draft is about that. I certainly can't tell what the proposed changes are "for" in terms of a real, future downtown. It seems to want to be congruent with a notion of growth, but it doesn't seem to offer real opportunity to direct that growth. Some of my concerns are outside the scope (I think) of the draft, such as the ramifications of this kind of growth for the surrounding communities, or the question of why simply building tall residential towers is enough to convince people to live in them. Nothing I heard last night made me think anyone would move off the Issaquah plateau to live downtown.

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Still, for an EIS, there seemed precious little said about the impact of growth in general on the environment, adjusted or otherwise. Again, I think a base rate should be established. It's not clear to me that Seattle can sustain the population it has, long-term, without environmental degradation in key areas.

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I am for a vibrant downtown that doesn't close up at 5:30pm. I just arrived back in town after three years in San Francisco, which has that kind of density-driven lifestyle in spades. Of course, I can't help but note that San Francisco isn't over-fond of tall towers, bulky or slender, and certainly not for residential use. That's not why people move to San Francisco (and I'd think you could ask the same thing of why people move to Seattle).

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Secondly, a good portion of the vibrancy has to do with a thriving network of support-service small businesses, such as restaurants, bars, and corner stores, which don't tend to "live" in towers' shiny first-floor retail spaces. The Palomino might; a local bistro doesn't.

Thirdly, I note that San Francisco's population density isn't a function of height increases. Obviously that results in the real estate costs we're all aware of. But again, what precisely is the cost/benefit ratio? What's optimal? People have not stopped moving to the Bay Area, after all. And we have yet to test our current tall buildings in our anticipated large earthquake.

To come back to the beginning, the key points here are scope and clarity. And context. For future meetings, I'd like to leave knowing succinct answers to these questions:

1) Why are we here today? What do we hope to accomplish by having this meeting? What are the means by which these goals will be accomplished?

2) What is the context of the process we're involved in? What is the stage of the process we're treating? What is our next step?

Thanks very much for this opportunity to respond.

MICHAEL BAKER

Gordon Clowers - City Height Limits

From: marshall_n_brown@hotmail.com
To: <gordon.clowers@seattle.gov>
Date: 11/12/2003 10:15 PM
Subject: City Height Limits

Please consider this a very firm opposition to any change to the greater Seattle downtown height limits, especially the Regrade, lower Q.A. and South Lake Union which would impugn or diminish the view of or from The Space Needle. The Needle IS Seattle in the World's eye, worth more in commerce than 100 skinny skyscrapers or condos, low income or not, or 100 city council members or mayors. Any who would change the Needle's "presence" should be tarred and feathered and ridden out of town!

1

Marshall N Brown
2961 36th Ave S
Seattle WA 98144

Gordon Clowers - Public Comment on Draft EIS for Downtown Height and Density Changes

From: "Jonathan Dubman" <jon@dubman.com>
To: <gordon.clowers@seattle.gov>
Date: 1/29/2004 1:50 AM
Subject: Public Comment on Draft EIS for Downtown Height and Density Changes

This Draft EIS is an thorough study of an important issue for the future of our city. I do not take issue with the analysis, but would like to make some general comments. Overall, I am encouraged by the discussion of easing the limits on building heights downtown and in other areas where appropriate. There are many lessons to be learned from the fantastic success of downtown Vancouver in the same 14 years since Seattle passed the outdated and counterproductive CAP Initiative.

While it is certainly possible to build a wonderfully livable city with buildings no more than six stories (witness Paris), I favor moving in the direction of letting the market determine building heights, while retaining city oversight of architectural design, street frontage, etc. Alternative 1 is most appealing to me on this basis.

Raising height limits now will help preserve the opportunity for residential infill later if and when the market demands it. More housing downtown and in areas where the infrastructure can support it takes the long-term pressure off future upzoning in single-family neighborhoods such as my own (Montlake). It's not clear to me that upzoning would have a negative effect on the affordable housing problem; to the extent that we help foster a pedestrian-friendly, livable city where more people can live and work in close proximity, fewer people will need to own a car, and less structured parking will ultimately be necessary, thus contributing to lowering the cost of living in Seattle or at least helping to counter an upward trend.

Having grown up in a wonderful part of Chicago where 50 story skyscrapers were built among 3-story historic townhouses, I believe that Seattle's zoning overemphasizes the benefits of gradual transitions of development height and density. The Chicago neighborhoods (Near North / Streeterville / Gold Coast) are dense, dynamic, and full of character, with interesting views of and from the structures and streets.

I favor zoning changes that would encourage narrower building footprints, perhaps with a taller structure, to preserve views, provide better views from within the structure, provide a more interesting streetscape and skyline. My main concern in this process, aside from the obvious (providing adequate transportation infrastructure), is the preservation of the most historic structures, some of which are protected by existing historic designations, but many of which are not. A young city like Seattle ought to hold on to the best examples of what little history it has.

Jonathan Dubman
2014 E Calhoun St.
Seattle, WA 98112

1

Gordon Clowers - 24 Feb Meeting on Code Changes for The "New Downtown Area".

From: Bob Hintz <rfhintz@att.net>
To: <gordon.clowers@seattle.gov>
Date: 2/20/2004 9:47 PM
Subject: 24 Feb Meeting on Code Changes for The "New Downtown Area".

Why isn't this matter being considered based upon and following appropriate modifications to Seattle's Comprehensive Plan?

R. F. Hintz

1



TOUCHSTONE CORPORATION

January 30, 2004

Dennis Meier
City of Seattle Dept. of Planning and Development
700 Fifth Avenue, Suite 2000
Seattle, WA 98104-5070

Re: Downtown Height and Density Changes DEIS

Dear Mr. Meier:

Thank you for the opportunity to comment on the Downtown Height and Density Changes DEIS ("DEIS"). I am President of Touchstone and a downtown resident.

Touchstone is the developer of a number of projects in the downtown neighborhood, including 9th and Stewart Life Sciences, Fifth and Bell, Stewart Place, and Westlake Plaza. We are also active participants in the Denny Triangle Neighborhood Association and helped to prepare the Denny Triangle Neighborhood Plan.

Our interests as downtown residents, neighbors and property owners are to ensure that the Denny Triangle Neighborhood Plan is implemented, and that downtown height and density changes are approved to fulfill downtown's critically important role as the region's employment center.

Our comments on the DEIS follow:

Alternative 1. Touchstone generally supports Alternative 1. Its height and density increases are consistent with the Denny Triangle Neighborhood Plan, and will contribute to the area's attractiveness for office, biotech, and residential development. We note one significant omission, however. The Denny Triangle Neighborhood Plan (see Figure 6) recommended increasing base FAR from 5 to 7 in the DMC zone, and from 5 to 6 in the DOC2-300 zone. The description of Alternative 1 (see Table 2) does not reference this base FAR increase. We request that the Final EIS incorporate that base FAR increase, as proposed by the Denny Triangle Neighborhood Plan, into the Alternative 1 proposal.

If the failure to include the base FAR increase was intended, then the Final EIS should disclose that the proposed Alternative 1 would result in a drastic increase in the cost of development. At p. 2-13 of the DEIS, it is stated that "the provision that now allows a wider range of bonus choices to be used to gain the first FAR above the base FAR in the DOC1 and DOC2 zones would be eliminated." Currently, that first FAR can be gained through the provision of on-site amenities and other project-enhancing public benefit features. As proposed, Alternative 1 eliminates that option and requires the first FAR above the base to be purchased outright, at \$22 per foot! Unless Alternative 1 includes the base FAR increase

envisioned in the Denny Triangle Neighborhood Plan, we would strongly oppose this proposed change. At the least, it should be fully discussed and its impacts disclosed in the Final EIS.

Alternative 2. Touchstone strongly opposes Alternative 2. Alternative 2, in essence, proposes to ignore all of the major recommendations of the Denny Triangle Neighborhood Plan. The Final EIS should acknowledge that if Alternative 2 is adopted, the Denny Triangle Neighborhood Plan would be eviscerated. Touchstone urges the City Council to support the neighborhood planning process, and to repudiate Alternative 2. At page 2-15, the author of the DEIS suggests that Alternative 2 proposes no changes to the DMC zone in the Denny Triangle because it is "desirable" to discourage commercial development in favor of residential, and to maintain a gradual transition to the surrounding residential neighborhoods. The author neither identifies the source of this value judgment, nor does the author acknowledge that this value judgment is inconsistent with the neighborhood consensus that supports Alternative 1.

Alternative 3. Touchstone even more strongly opposes Alternative 3, which amounts to a downzone of much of the Denny Triangle. Not only is this inconsistent with the Denny Triangle Neighborhood Plan, it is also inconsistent with long established City policy to encourage downtown as the employment center of the region. It is difficult to understand why vast public resources would be expended to develop mass transit facilities to bring employees downtown, if the City were then to proceed to discourage employment growth downtown. The Final EIS should acknowledge this inconsistency and analyze its impacts.

TDC Program. The Draft EIS identifies the termination of the TDC program as an adverse impact of Alternative 1. The Final EIS should revise this evaluation. The TDC program, while fine in theory, is of virtually no value in the real world. It has never been used, and is never likely to be used. It is too costly and cumbersome. Thus, its loss is not an adverse impact.

Height, Bulk and Scale. The Draft EIS at numerous locations suggests that implementation of Alternative 1 will result in larger and more bulky buildings, and at least implies that this is an adverse impact to residential character and the downtown aesthetic environment. This evaluation is superficial, and should be refined in the Final EIS. While allowing greater height and density will surely result in larger buildings, it does not follow that these larger buildings will adversely affect the residential character or downtown aesthetic environment. Cities like New York and Chicago have succeeded in creating dynamic downtowns that include large buildings. The answer is not to crimp on size, as the author of the DEIS suggests. Rather, the answer is to utilize the design review process and to amend the land use code to allow greater design flexibility so that buildings can energize the street and the cityscape, rather than become a blot upon them. This is fully possible with good design.

Thank you for considering these comments.

Sincerely,

Touchstone Corporation



Douglas Howe, President

SAMIS LAND CO.

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E-MAIL: samis@samis.com

February 27, 2004

Mr. Dennis Meier
City of Seattle
Department of Planning and Development
700 5th Ave., Suite 2000
Seattle, Washington 98104-5070

Re: Comments to the Draft Environmental Impact Statement dated November 2003,
2003 Downtown Height and Density Changes

Dear Mr. Meier:

Our company owns 22 properties in the downtown core area of Seattle. Some of these properties we have owned for more than 60 years. A healthy and vital downtown core is extremely important to the success of our properties and our tenants. Job growth and a significant increase in residential development in the downtown core are essential to a healthy and vital downtown neighborhood. We wholeheartedly support increases in height and density but do not believe that Alternative 1 in the DEIS goes far enough to allow for the appropriate density in the downtown core. Of course we need to have height and density that is appropriate for our downtown core but Alternative 1 will not allow projects with similar height and density as many of our existing buildings.

1

Increased density in our downtown core is not just a local issue. With increased density downtown we reduce the pressure for growth in our suburban and open-space areas of the region. Encouraging growth in our downtown is the best way to utilize our investments in public transportation. In November of 2003, just three months ago, the Puget Sound Regional Council directed a survey of citizens across the central Puget Sound region to gauge attitudes and opinions about quality-of-life, and an indication of the region's priorities. Nearly 1000 citizens in our four county area were surveyed and the results show some well-informed opinions; 79% favor encouraging growth over limiting growth, and 67% favor focusing growth within already developed areas.

Specific comments to the DEIS:

The document does not recognize, as it should, that downtown residential growth is actually a form of traffic mitigation and reduced parking demand. Page 3-191 in the paragraph titled "Reduce Trip Generation Through Area-Specific Rezones", it states "For example, future development of residential uses might generate fewer overall vehicle

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trips than office development on the same properties.” The statement that residential development “might” generate fewer overall trips than office development certainly shows a lack of understanding of the downtown resident. A significant attraction to living downtown is to be close to one’s job. A great proportion of the downtown residents commute by walking or taking a bus to their place of employment. Therefore placing residents near their location of employment is traffic mitigation. On page 3-198, the discussion of Off-Street Parking exaggerates the parking demand because those downtown residents working downtown that do own cars either park their car at their work location or their home location not both. We believe a survey of parking and commuting patterns of downtown residents would show a trend of declining automobile ownership and a corresponding decline in the number of resident commuters using automobiles and parking. This does not only apply to low income or affordable housing but, as an example, a redevelopment project on Fourth and Pike successfully sold 24 residential condominium units without any parking with some of the units costing over \$2 million each. Just in the last few years we have observed a major shift in automobile dependence of the downtown resident.

We believe the growth in jobs downtown estimated in the DEIS from the year 2000 to the year 2020 is too high and that the development capacity in the downtown core is greater than described in the DEIS. This also means that the impacts from the projected job growth will be less than described in the document over this period of time. Our rationale for this conclusion is as follows: We are already four years into that 20 year period and the current inventory of vacant office space is 5.6 million square feet. This equates to the 15.8% vacancy in the total downtown office inventory of 35.6 million square feet. Assuming 250 square feet per occupant yields a job capacity of 22,500 jobs, we expect it could take eight years to absorb this capacity and office space. In addition, the planned construction of the new Washington Mutual Tower and King County office building could add another 1 million square feet of vacant office space in the core and add another year or two to absorb all of the vacant office space. This does not mean we do not need increases in height and density in the core. We need to utilize the precious little land we have in the downtown core to the greatest extent possible and by increasing the height and density we have a great opportunity when development does occur to create funds through the FAR bonus system for affordable housing. With government funds becoming so precious, this may be the best opportunity over the long-term to fund this much needed housing.

While this inventory of office space is being absorbed over the next eight to ten years, one of the best ways is to stimulate growth and develop an attractive, safe, and vital downtown core is to encourage housing in high-rise high density structures. In fact, if a significant amount of this housing is developed it could attract job growth from outside of the region and absorb the office inventory more quickly.

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Recommendations:

1) Increase the maximum FAR in DOC-1 to 20, in DOC-2 to 16 and in DMC to 13. The DMC zoned properties actually offer more opportunities for development than the DOC zones and are extremely important to the long-term growth of the downtown core. As proposed in the DEIS, make available 75% of the FAR bonuses only by affordable housing TDR, payment to an affordable housing fund, or the development of affordable housing. This is the best opportunity to develop a true housing mix downtown. The remaining 25% should be gained only through landmark TDR or a contribution to fund offsite development of public open-space in the downtown core or to fund the maintenance and enhancements of existing public open-space downtown. We believe on-site amenities will be market driven and do not provide the broader community benefit of the bonus opportunities described above.

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2) To encourage more attractive and slender buildings with better proportions we recommend height increases of 50% over the existing height limitations in the code rather than 30% proposed height increases of Alternative 1.

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3) We believe the PCD (planned community development) process could provide some excellent design opportunities but has been underutilized because of the minimum land area requirement. We recommend that requirement be reduced to 25,000 sq. ft.

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4) Try not to regulate the balance between employment and residential growth in the core but let the market determine what happens in the future. Right now high-rise residential development is needed for many reasons to make this a thriving downtown core, and then commercial development will follow. We also expect more development projects with mixed-uses of office and residential.

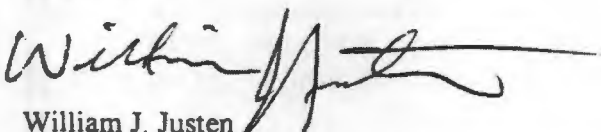
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5) Act quickly! The increases in height and density should be adopted before the end of this year so that development that is being planned over the next several years can be better than it would be with the current land-use regulations.

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This is a great opportunity to adopt the downtown core land-use regulations that will shape growth well beyond 2020. We look forward to being an active participant in making our downtown a greater place.

Sincerely,



William J. Justen
Managing Director, Real Estate

WJJ/

February 28, 2004



Corporate Administration
4601 Sixth Avenue South
Seattle, Washington 98108
Tel (206) 624-3215 Fax (206) 624-0377

Diane Sugimura, Director
Seattle Department of Planning & Development
700 5th Avenue, Suite 200
Seattle, WA 98104

RECEIVED
MAR 02 2004
Dept. of Design
Construction & Land Use

Re: DEIS on Downtown Height & Density Changes

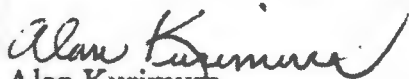
Dear Director Sugimura:

Uwajimaya strongly supports the Downtown Urban Center Plan priorities for housing and employment in downtown and its adjacent neighborhoods. Increased height and density are needed to encourage more housing and job creating uses. The City can and should do more than is presented in the four alternatives covered by the DEIS.

Tax payers are investing hundreds of millions of dollars in several transportation alternatives (to the single occupant vehicle) which will link downtown with other parts of the region. The City should encourage and support development which will create the housing and employment opportunities for users of these transportation investments.

Uwajimaya encourages the City to consider the Downtown Seattle Association's two-pronged approach.

Sincerely,


Alan Kurimura
Vice President

Cc: Greg Nickels, Mayor
Members, City Council

1

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DEPARTMENT OF DESIGN
CONSTRUCTION AND LAND USE

JAN 30 2004

RECEIVED

January 30, 2004

Dennis Meier
Department of Planning & Development
City of Seattle
700 Fifth Avenue, Suite 2000
Seattle, Washington 98104-5070

Re: Downtown Height and Density Changes EIS

Dear Mr. Meier:

We are writing to provide comments on the Downtown Height and Density Changes Draft Environmental Impact Statement (the "EIS"). We address both general policy issues relating to the proposal and specific comments on the EIS below.

Policy Issues

Several policy issues were identified at the public hearing on the EIS in December 2003. These include the following:

1. **None of the alternatives goes far enough in providing additional density, height and design flexibility in the downtown core.** Even EIS Alternative 1 fails to establish downtown densities consistent with applicable Neighborhood Plan goals and appropriate in light of infrastructure investment in the area. Without additional height and density, higher building costs downtown will increase sprawl by making it cheaper to build in outlying neighborhoods when land and other costs are less. 1
2. **The EIS should address the need for greater design flexibility.** Design requirements such as upper level setbacks have added unnecessary building costs and tend to create buildings with similar massing. Design review has made many existing development standards unnecessary. 2
3. **The EIS should investigate the benefits of greater height and density in making best use of investments in mass transit.** None of the alternatives offers adequate density or height commensurate with the regional investment in transportation infrastructure. Light rail, the monorail and buses are most effective in areas with dense urban cores. The billions invested in the monorail, light rail and the bus tunnel will be ill-spent without greater downtown density. 3

4. The EIS should honor the neighborhood planning process. The Denny Triangle Neighborhood Plan – which was adopted in the previous decade – should be implemented as quickly as possible. The constituent groups in the Triangle unanimously support the Plan.

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5. Downzoning the Denny Triangle means fewer jobs and less affordable housing: Alternative 3 proposes to downzone large areas of the Denny Triangle to create more of a “residential” emphasis and to provide “buffers” for Belltown. Alternative 3 would sacrifice 30,000 jobs downtown over the next 20 years and create less housing. “Buffers” inside the Downtown core would prove counterproductive and harm the most important job production location in the entire Northwest.

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6. Mandatory mixed-use is unnecessary and will not work: Alternative 3 proposes to require some sites in the Denny Triangle to provide mixed office/housing development on the same lot. High-density downtown mixed-use projects are too difficult to finance and develop.

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7. Slender residential buildings can be attractive, but the Code should not penalize property owners to promote them: Slender residential buildings cost much more to build per-square-foot, which translates to higher rents and increases sprawl by making such buildings uncompetitive in the greater Seattle marketplace. The EIS is wrong to suggest that building bulk adversely affects the pedestrian environment – New York and Chicago are proof this is not true.

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Specific Comments

We also offer the following specific comments on the EIS:

Overview

The EIS approaches the prospect of Downtown development over the next 20 years with a clear sense of inevitability. It does not question whether or to what extent development – both residential and commercial – will occur Downtown, but assumes the demand is there to be molded and regulated. In this, the EIS suffers from the lack of a regional, even City-wide, perspective. In the last development cycle, for example, the increased cost of and restrictions on Downtown property resulted in over 50% of new commercial development occurring *outside* the Downtown. Increased restrictions will only exacerbate this trend. But the EIS does not consider the entirely predictable – and documented – market reactions to increasing regulation in the Downtown area. As a result, the real impacts of Alternative 3 (which actually downzones areas of the Downtown) and of many “mitigating” measures discussed in

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the EIS are not evaluated. These impacts will be reflected in the inevitable work of market forces to redirect new development to areas in Seattle and the region where it is less expensive and easier to achieve. Dispersal of development to areas where it cannot readily be served by transit and rail and where it will tend to impact neighborhoods will lead to a host of additional impacts. None of these impacts is addressed in the EIS.

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It is also a limitation of the EIS that its inventory of mitigating measures focuses predominantly on new *restrictions*, rather than new *incentives*. Incentives, which will attract new and different kinds of development to areas, should play a larger role in the City's review of alternatives. New restrictions will only discourage development, and tend to divert it – as noted above – to the many areas in the region where it is easier and less expensive to accomplish.

Employment

- The EIS assumes (e.g., at 3-9) that the zoning changes proposed in each alternative are "not likely to change the amount or type of Downtown employment over twenty years." This assumption ignores the potentially significant impacts that zoning regulations have on the comparative cost of development in different sub-markets in the region. Increasing height and density will often have the effect of decreasing per-square-foot costs of development; likewise, increasing FAR bonus values will increase such costs. Development restrictions, like floorplate limits, parking ceilings and other bulk restrictions, will alter the relative attractiveness of Downtown locations in comparison to sites in other Seattle neighborhoods or suburban cities. By assuming away this relationship between zoning regulations and market decisions regarding development location, the EIS ignores a whole host of impacts. In particular, the EIS ignores the significant likelihood that the lower densities, increased costs and unviable development restrictions of Alternative 3 will make other regional sites more attractive in comparison to Downtown, and therefore result in increased sprawl.
- Another consequence of this improper assumption is that it allows the EIS to conclude, in effect, that the four alternatives are essentially neutral as to job production over the next 20 years. For the reasons noted above, this is unlikely to be the case.

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Housing

- **TDC Program.** The EIS implies that the loss of the TDC program in Alternative 1 would be an adverse "impact." It is improper to suggest that the loss of a program that have never been used (nor may never be used), is

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"adverse." The EIS acknowledges that the TDC program has never been used, but suggests that this owes to "lack of understanding or interest" on the part of developers, or the intervention of an adverse economic cycle. The EIS concludes that it is "too early to tell" if the TDC program will ever bear fruit. It is therefore speculative to suggest that the loss of the program is an "adverse" impact.¹

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- **"Jobs/Housing Balance":** The EIS assumes that a principal goal of Downtown planning under the Comprehensive Plan is to achieve a "jobs/housing balance" within the Downtown urban center. See, e.g., EIS 1-7, 1-18. The Comprehensive Plan does not support this assumption, and in fact this assumption is inconsistent with the Plan and the applicable Neighborhood Plans, which assume that Downtown will be the principal employment center for the region. It is inappropriate for the EIS to base its assessment of housing impacts on this premise.

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- **Low-income Housing.** From the erroneous premise that Downtown workers should live Downtown (noted above), the EIS concludes (for example) that Alternative 2 results in superior housing impacts, as compared to Alternative 1. EIS 3-23 (Alternative 2 results in a 13% increase over Alternative 1 in the proportion of low-income households that could supposedly find housing Downtown.). The EIS should note that this is the case because Alternative 2 produces fewer jobs Downtown, not because Alternative 2 creates a significantly larger inventory of affordable housing.

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- **Housing Demand.** The EIS appears to treat Downtown housing demand as a function of household desire, suggesting that in each alternative there is likely to be a certain percentage of households that desire to live Downtown and are unable to. EIS 3-18, 3-20. There is no legitimate research to support this conclusion. Furthermore, it reflects an erroneous policy assumption that employees in an urban center should live in that urban center (see above: Jobs/Housing Balance). While this case might be argued for some urban centers, Downtown is specifically intended under the Comprehensive Plan to be an employment center that provides jobs for residents throughout the region. The City and the region are investing billions of dollars in transportation infrastructure to ensure that Downtown jobs are accessible to residents throughout the region

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¹ In truth, the TDC program has not been used because it does not offer benefits to offset its substantial costs. This equation is unlikely to change, so it is equally unlikely that a project will ever be developed under the TDC program.

- **Mixed-use Projects.** The EIS assumes that the regulatory requirements of Alternative 3 – which mandate some mixed-use buildings in certain DMC zones – will produce more housing than other alternatives in the same zone. This assumption ignores the other factual observation made in the EIS – that such mixed-use buildings have not been successful Downtown. The market will not respond to such regulatory mandates, if they are not viable. As a result, the EIS overstates the amount of housing that would likely be produced in such DMC zones under Alternative 3.
- **Affordable Units.** It is initially unclear how Alternative 3, which would result in 8 million fewer square feet of office space Downtown, could result in the production of 325 more low-income housing units than Alternative 1. EIS 3-25. Upon closer inspection, it appears that the EIS achieves this result by adopting different baseline assumptions for the two alternatives. These assumptions – which are not mandated by the policy underpinning for either alternative – have the effect of understating low-income housing production in Alternative 1 and overstating its production in Alternative 3. For example:
 - The EIS assumes that DOC-1 base FAR will not increase in Alternative 3, an assumption which automatically increases the funds available for low-income housing by 10%.
 - The EIS assumes that Alternative 3 – in which development is more expensive, owing to the 10% increase in bonus costs – will nevertheless produce 715,000 s.f. more floor area in DOC-1 than will Alternative 1 over the next 20 years.

For purposes of advising the ultimate policy decisions the City needs to make, the EIS should be updated to include comparisons between alternatives based on a consistent set of assumptions.

- **Mitigation Strategies.** The discussion of housing mitigation strategies in the EIS focuses on measures that would either increase the cost of development, reduce development densities, or both. EIS 3-28. These strategies have not been evaluated in a market context, to determine whether such increased regulatory restrictions would actually produce more affordable housing – or as is more likely the case, reduce the economic feasibility of projects altogether.
- **Residential Amenities.** The role of residential amenities (e.g., schools, play areas) in attracting families and larger households Downtown (EIS 3-29) is an important incentive that should be further explored.

Land Use

- **20-year Development Model.** The long-term development model discussed in the EIS assumes that each alternative will result in the development of the same amount of total office space Downtown over 20 years. This assumes that the alternatives are neutral in their potential effects on how the market allocated commercial development between Downtown and other areas in Seattle and the region. This assumption is not supported in the EIS. In fact, it is more likely that alternatives that accommodate higher-density development opportunities at lower cost will tend to attract more commercial development to the Downtown in the long-term, as compared to alternatives that focus on lower-density, higher-cost development.

In other words, the EIS leaves one with the conclusion that zoning is irrelevant over a 20-year cycle – that production of new office and residential space is purely dictated by demand. EIS 3-9. This fails to account for the regional nature of demand. The EIS does not look at this issue (i.e., capture rates for new development within the Downtown, as compared to other areas in the region); the EIS analysis is only a capacity analysis.

- **Maximization of Density.** It should not be assumed that developers will maximize office floor area allowed under the Code. EIS 3-48. While this has been the case in past years, the 80% increase in per-square-foot costs for floor area bonus (from \$13 to \$22 per s.f.) in 2001, together with the significant increase in vacant space and tightening of underwriting standards, indicates that developers may avoid full-FAR development to avoid the cost of bonus square footage or to bring projects to market more rapidly. Most other office markets in the region do not impose such fees on additional square footage, and Downtown developers must compete against these markets.
- **Regional Impacts.** The EIS limits its review of land use impacts to a small fraction of the developable area of the City. It tends to focus on the perceived "adverse" impacts of density, without considering the inevitable impacts associated with the dislocation of Downtown development to areas elsewhere in the City and the region. If commercial office demand is not satisfied in Downtown, where it can best be served by regional rail and transit, it will occur in Seattle neighborhoods and suburban communities, which lack similar transportation infrastructure. Alternative 1 minimizes these impacts to other neighborhoods and communities, but this fact is not addressed in the EIS.

Height, Bulk & Scale

- The EIS asserts that the DMC zone was created to promote a "desired transition area." EIS 3-83. From this, the EIS develops a new concept of "sensitive transition areas" in order to justify certain conclusions relating to the potential "impacts" on these "sensitive" areas under Alternative 1. This assessment has no basis in the Comprehensive Plan or in the Denny Triangle Neighborhood Plan. If the EIS is attempting to draw conclusions from assumptions about legislative intent in the City Council's adoption of the LUTP in 1985, those conclusions have been superseded by multiple Plan and Code changes in the intervening years. 21
- The EIS makes much of alleged "bulk" impacts in certain areas of Downtown, but offers no foundation for such "impacts" in the City's SEPA Ordinance. In fact, the SEPA Ordinance presumes that the use of the City's design review process will mitigate such "impacts." 22
- It is inappropriate for the EIS to suggest that alley vacation approvals may lead to adverse bulk and scale impacts Downtown. Relatively few alley vacations have been concluded in the Downtown in the last decade, and in cases where approvals have been granted, they are inevitably site- and project-specific approvals, subject to additional layers of design review and conditioning. It is not legitimate to draw broad-based conclusions from such few examples.² Further, where such alley vacations have been approved, they have also been used to accommodate unique site conditions (e.g., landmark buildings) or to mitigate building massing issues through increased site utilization. None of these considerations is discussed in the EIS. 23
- "Slender" residential buildings cannot merely be mandated by Code, and the EIS is correct to focus on incentives to promote the development of such buildings (such as height bonuses). EIS 3-102. Slender residential buildings will be substantially more expensive to construct, and therefore less able to compete in the market against residential product developed in other Seattle neighborhoods and nearby suburbs. As a result, it is less likely that the market will produce such buildings Downtown, unless compensating benefits (such as additional height) are provided. 24

² Nor is it clear that the concept of "prohibiting" alley vacations in certain areas (EIS 3-104), which would require one City Council to limit the legislative discretion of a future City Council, is even legally possible.

- "Slender" office buildings pose a more critical problem. Market demand for office space typically dictates a minimum floorplate size of 20,000 square feet or more. Such floorplates are readily provided in office developments in other Seattle and regional locations; and if Downtown buildings cannot meet this threshold, they will not be able to compete in the regional market. As such, new buildings – if subject to floorplate limits – are unlikely to be built Downtown. The same problems inhere in the EIS's suggested "mitigation" for height and bulk: creating obstacles to "large-floor-plate structures extending to the prescribed height limit." EIS 3-103. This "mitigation" is a formula for diverting Downtown development to outlying areas. 25
- We strongly discourage the propagation of DMR development standards in other areas Downtown as a mitigation measure. EIS 3-102. 26
- The concept of converting residential floor area to "chargeable FAR" space would be a major step backward in Downtown planning. EIS 3-103. Such a step would run counter to the strong policies of the Downtown Plan and its Neighborhood Plans, and would significantly undermine the prospect of increased residential development in the long-term. The EIS offers this "mitigation" measure without any consideration of its impacts on housing creation Downtown or its relationship to plans and policies. 27
- Development "overlays" for newly-minted "sensitive transition areas" will only reduce the likelihood of development in these areas. For this reason, it would be a mistake to assume that such overlays would produce superior development. 28

Urban Design

- The EIS should acknowledge the important role played by the retail bonus in the development of active pedestrian environments. Changes to the retail bonus scheme in 2001 were not based on an evaluation of its usefulness in this regard. Ultimate proposals in 2004 should consider restoring this bonus more broadly throughout the Downtown. 29
- The EIS (at B-3) assumes that 5% of necessary bonuses must be obtained from Landmarks TDR, if available. It is not clear that this is the manner in which the Code is presently being applied. 30

Transportation & Parking

- For Alternatives 2 and 3, the EIS should acknowledge the City-wide and regional effects of dispersing development that would otherwise occur 31

Downtown under Alternative 1. This amounts to more than 30,000 jobs, which means that some 8 million square feet of office space would need to be accommodated in Seattle neighborhoods and suburban cities – where transit ridership levels are only a fraction of that Downtown.

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- The EIS should consider eliminating the minimum parking requirements for commercial uses Downtown. Parking ceilings, however, should not be lowered, since to do so would make Downtown projects significantly less competitive with other regional markets (where such parking ceilings do not exist).

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- The anticipated loss of parking lots and structures near the retail core underscores the need to promote the development of new short-term parking supplies accessible to this critical shopping area. Ultimate proposals should examine both the permitted uses and bonus structure of the Code to ensure this will occur.

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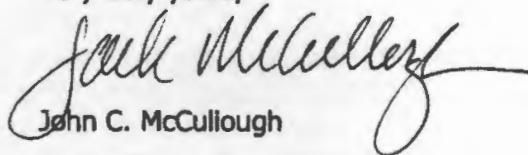
Energy

- The EIS should evaluate the new project costs imposed by requiring LEED improvements or certification for Downtown buildings, and the effect of such increased costs on the ability of Downtown to attract new development (in comparison to other regional markets, in which such additional costs are not imposed).

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We appreciate the opportunity to provide these comments on the EIS.

Very truly yours,


John C. McCullough

JCM:amc

McCULLOUGH•HILL•FIKSO•KRETSCHMER•SMITH

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MEMORANDUM

February 27, 2004

TO: Diane Sugimura
John Rahaim

FROM: Jack McCullough

RE: Further Comments on Downtown EIS

Working with a group of Downtown owners, developers, residents and architects, we have prepared a list of more specific suggestions for the preparation of a package of Code amendments to modify and implement EIS Alternative 1. They are attached.

The current Downtown EIS examines four broad alternatives to future development in the Downtown core. Many commenters have suggested that Alternative 1 – which most closely reflects the approved Neighborhood Plans – still does not go far enough to ensure that the next cycle of development Downtown will embody the goals and objectives of these Plans.

Of course, the Draft EIS alternatives are necessarily stated at a level of some generality, and cannot at this early stage incorporate every possible Code change that may be reflected in a final, adopted ordinance. It is appropriate now, however, to begin to identify those additional improvements and modifications to specific Code language that will help to ensure that the final package of amendments best implements the Neighborhood Plans.

What follows is a list of such possible Code changes. It is intended as a menu of options and designed to help inform the preparation of an ultimate package of proposals for consideration by the City Council. This list reflects many of the comments made during the two Draft EIS hearings held in December 2003 and February 2004, and is based on the following goals and assumptions:

- This current Code revision exercise is directed by, and intended to implement, the City's adopted GMA Comprehensive Plan and the Neighborhood Plans for the Downtown.
- The Downtown will soon be the hub of billions of dollars of new high-capacity regional transit systems. Thus, attraction of regional jobs is a key goal of these Plans; but so should be a significant increase – even a doubling, as suggested by the Mayor – in the Downtown residential population.
- Bringing more residents of all income levels Downtown will depend upon offering a broader and more complete palette of services and amenities to serve them, including usable open space, neighborhood-level shopping opportunities, and even schools.
- The low-income housing bonus provisions adopted in 2001 should be preserved, but also strengthened in key ways, by broadening the geographic scope of the program, making the payment program more flexible, and ensuring an adequate supply of amenities to serve all residential populations.
- The City this year should complete the work begun in 1999, to properly rezone key sites in the Pike/Pine corridor so as to help assure their redevelopment in the next cycle.
- Regulatory prohibitions may help prevent certain kinds of development, but ultimately cannot *attract* the positive development projects the Downtown needs. Instead, incentives should be the key elements in this package of Code amendments, and those incentives should be *market-based*.

Improve Urban Design

Enhance the Design Review Process • Broaden the range of design departures to include new elements, such as height. • Clarify the Downtown design guidelines to ensure that departures are granted for good design, not in exchange for other "benefits"	<i>The Downtown DRB has had a commendable record in the last decade, and has earned the opportunity to address a broader range of departures.</i>	2
Eliminate Needless Upper-Level Standards • Eliminate or simplify the following bulk and dimensional standards of the Code: ◦ Upper-level "setbacks" and coverage limitations ◦ General setback formulas	<i>These standards tend to promote a uniformity of design and penalize development on smaller sites.</i>	3
Modify the Access-to-Parking Standards • Revise the hierarchy of locations to access for parking, emphasizing curbcuts on streets of least pedestrian importance, but preserving alleys for service and loading functions.	<i>Principal building entrances and loading areas don't mix well. Driveway entrances at the street make projects more attractive for residents and employees.</i>	4
Provide for a Transition in Scale • Create an optional "transition overlay" on sites located between zones (DOC-1, DOC-2, DMC) in Downtown, to reduce bulk impacts: ◦ <u>Split-zoned Sites</u>: Allow height and density to be moved around freely on large (e.g., full block) split-zoned sites. Height and density could be increased on	<i>Split-zoned sites can pose a particular challenge for addressing changes in scale. Providing additional flexibility for these and other transition sites would be a useful design tool.</i>	5

the less-intense side of the block (above nominal zoning limits on that portion of the site), as long as overall development intensity and height does not exceed that permitted on the site as a whole. o <u>Single-zoned Sites:</u> On uniformly-zoned sites located on a boundary with another zone, allow height and density increases equal to half the difference between the two adjoining zones.	
Create a More Interesting Skyline • To create a more interesting skyline, allow floor area to be transferred from sites within three blocks and "stacked" on top of existing height limits, up to 750' in DOC-1, 600' in DOC-2 and 400' in DMC-240, subject to a dispersal criterion (e.g., "stacking" could not occur within three blocks of another "stacked" site in the same zone).	<i>Uniform height limits create a "ceiling" on the skyline. Allowing height to be "stacked" in a limited way within a small area will tend to create skyline diversity without increasing underlying density.</i>
Promote Slender Residential Towers • Provide height bonus for slender residential towers (see below)	<i>The importance of this goal is discussed below.</i>

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Promote Residential Development

Allow TDR from Residential Sites • Allow transfer of unused development rights from residential project sites to other sites within Downtown.	<i>Even limited to the 25% bonus tier, this measure would help jump-start future Downtown housing.</i>
Promote Slender Residential Towers • Promote the development of slender residential towers by eliminating height limits for "slender" residential buildings in DOC-1, DOC-2 and DMC zones. "Slender" residential towers will have different meanings in different contexts, depending upon lot size, block size, and adjoining development.	<i>Because "slender" residential buildings are more expensive per-square-foot to build, they will not be able to compete in the greater Seattle market – and therefore will not be built – without significant incentives. In all cases, slender should focus on the area above 85', allowing the potential for base-level office.</i>
Provide Energy Code Relief • Relieve Downtown residential buildings from the obligation to comply fully with the new Energy Code.	<i>Downtown housing reduces regional energy costs in many ways. Recognizing these regional savings, energy code relief will make Downtown housing more affordable and more attractive.</i>
Provide Residential Amenity Bonuses • Provide new bonuses for critical residential amenities, like supermarkets and schools. (See the discussion below.)	<i>Since such bonuses benefit housing at all income levels and since few of these opportunities will arise, this bonus could be offered in all bonus tiers.</i>
Provide "Kid-Friendly" Amenity Bonuses • Use the bonus program to create incentives for kid-friendly housing projects, such as those with play areas or a family-oriented unit mix.	<i>Modifications to the open space bonus program could help to achieve this goal.</i>

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Restore the Childcare Production Bonus • Restore childcare production as an independent bonus item in all bonus tiers.	<i>Lack of a childcare production option will preclude new private-sector childcare operations Downtown. Since this bonus benefits housing at all income levels, this bonus could be offered in all bonus tiers.</i>
Provide Other Code Relief • Relieve Downtown residential buildings, particularly "slender" ones, from the obligation to comply fully with certain provisions of other construction Codes.	<i>"Slender" residential buildings are more expensive per-square-foot to build, and will not compete in the greater Seattle market without Code flexibility, such as on certain exiting requirements.</i>

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Make Downtown More Attractive for Residents and Families

Create More Usable Downtown Open Space • Use the open space bonus to provide for a major neighborhood open space bonus category, to be generated by contribution to a minimum 20,000 s.f. public open space within three blocks of a project site. • Allow office and residential buildings to provide required open space off-site, within three blocks of the site, as part of a major neighborhood open space.	<i>Focusing open space contributions on neighborhood-wide opportunities will provide benefits throughout the area.</i>
Provide a Bonus for Open Space Capital Projects • Establish an open space bonus for capital improvements to existing Downtown parks and open spaces within three blocks of the project site.	<i>In some areas, improvements to existing open spaces will be more critical and feasible than the creation of new ones.</i>
Provide a Bonus for Open Space O & M • Provide a new bonus for costs of operation and maintenance of a publicly-accessible open space.	<i>Improving operation and maintenance of an open space, whether existing or new, can immediately make it more usable to local residents and employees.</i>
Restore and Enhance the Retail Bonus • Restore bonus for retail, restaurant and entertainment uses at street level; increase geographic scope of bonus; restore bonus for upper floor retail space. • Create new bonus category for supermarket use (minimum 20,000 s.f. store); allow supermarket to be	<i>The loss of this bonus, which was eliminated in passing in 2001, will be a major detriment to Downtown and its residential and pedestrian environment. It <u>must</u> be restored and its scope expanded to include new areas in the Denny Triangle. As noted above, the supermarket bonus</i>

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developed off-site and up to two blocks outside of Downtown boundary, but not within five blocks of the Pike Place Market.	<i>will benefit all housing Downtown.</i>
<i>Redevelopment of Existing Sites</i> Some Downtown sites (e.g., Bank of Cal) have potential redevelopment areas, but little available or affordable FAR. Provide "free"2 FAR (in addition to existing development) to spur redevelopment, if improvements are made to street-level uses.	<i>This measure could help to re-energize pedestrian streets in the DOC-1 area south of the retail core, by triggering pedestrian-friendly development that would not otherwise occur.</i>

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Make Efficient Use of High-Capacity Transit to Attract Regional Employment

<i>Eliminate Unnecessary Mitigation Authority</i> • Amend the Seattle SEPA policies to eliminate further mitigation authority for transportation impacts Downtown for all uses.	<i>Several billion dollars will be spent in the next decade on new transportation infrastructure Downtown. Physical "mitigation" by individual projects continues to be impractical and unnecessary. In addition to public transit infrastructure, transportation management plans (TMPs) and parking limitations provide the most significant traffic-related mitigation, and both are already required by Code.</i>
<i>Increase Densities Consistent with the Neighborhood Plan</i> • Increase maximum density to 20 in DOC-1, 16 in DOC-2 and 13 in DMC. Increase base FAR levels accordingly.	<i>These densities are consistent with the Neighborhood Plan and are necessary to support Downtown's new mass-transit and transportation infrastructure.</i>

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Link Density to Infrastructure Corridors • Allow density increases within four blocks of high-capacity rail transit (light rail, monorail, streetcar).	<i>This new infrastructure will provide the spines along which new development can grow.</i>	16
Eliminate Minimum Parking Requirements • Eliminate minimum parking requirements.	<i>Minimum parking requirements have already been eliminated for residential uses, and are unnecessary for office uses in some cases.</i>	17
Restore the Short-term Parking Bonus • Restore the bonus for short-term parking in areas near retail shopping.	<i>Like the retail bonus, this bonus was lost in 2001. Yet with the likely loss of many surface parking lots near the retail core in the future, there is more need than ever to preserve parking opportunities for Downtown shoppers.</i>	18
Promote New Parking Garages • Increase maximum distance for off-site parking from 800' to 1600' Downtown.	<i>This may help promote the construction of a limited number of new garages for Downtown parking.</i>	19

Promote Low-Income Housing

<i>Expand the Scope of Low-Income Housing Production</i> • Allow housing TDRs to be generated from sites outside Downtown but within the Center City.	<i>Downtown land is too expensive to be the sole opportunity for low-income housing production. Nearby sites in the Center City will provide more low-income housing in locations still accessible to all critical services.</i>
<i>Allow the Housing Bonus Value to Reflect Market Conditions</i> • Allow the housing bonus value – which was set at the height of the boom market – to float to reflect market conditions.	<i>This measure would not reduce the level of resources available to low-income housing, but help to ensure a steadier and more predictable flow of financial support.</i>

20

21

Make the Land Use Code More Understandable and Flexible

<i>Make the PCD (Planned Community Development) Tool More Flexible and Streamlined</i> • Allow PCDs in all Downtown zones. • Reduce minimum PCD area to 40,000 s.f. • Increase regulatory flexibility with PCDs beyond existing list of departures (to include height) and to provide flexibility under other codes (e.g., building, energy, etc.). • Allow administrative approval of PCDs.	<i>Broadening the availability of this tool and streamlining its process will make it an attractive option for new and creative Downtown projects.</i>
<i>Make the Use of TDRs More Flexible</i> • Eliminate limits on TDRs within-block and between zones (in DOC-1, DOC-2 and DMC). • Allow transfers from low-income housing, landmark and open space sites of both base FAR and the opportunity to provide bonuses to the base FAR. • Allow transfer of unused base FAR from residential sites throughout downtown	<i>Making the more flexible use of such TDRs available within limited portions of the bonus tiers will spur the production of low-income housing and other development. Providing the opportunity to build bonuses on low-income housing TDR will strongly promote the use of this important bonus.</i>

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Complete the Pike/Pine Corridor

Adopt Zoning to Promote the Redevelopment of the "Missing Link" in the Pike/Pine Corridor.

- Complete the originally-intended rezone of the two half-blocks between Pine and Union (east of 2d Avenue) to DMC, in order to promote redevelopment of key sites in this critical corridor between the Market and the retail core.

The two half-blocks between Pine and Union (east of 2d Avenue) were originally planned and reviewed for DMC zoning in 1999 under the current Downtown Plan, but were not rezoned. Some zoning changes were made in 2001, but not enough to ensure redevelopment. Now is the time to complete the rezoning of these sites, since redevelopment is unlikely occur without such strong policy and Code support.

24

Gordon Clowers - Downtown height/density proposals

From: "Steve Mooney" <smooney27@hotmail.com>
To: <gordon.clowers@seattle.gov>
Date: 2/5/2004 5:44 PM
Subject: Downtown height/density proposals

I'm not sure if you're the right person to send written comments to regarding the downtown density proposal, but your name was on the website, so I figure you'd at least know whom to forward it to.

I write to comment in favor of increased residential density downtown. A denser downtown means a more lively downtown, less regional traffic, and a more sustainable region. I believe the market can best choose the ratio of offices to residential units and therefore support Alternative 1 most, followed by Alternative 3.

Thanks.

Steve Mooney
1800 Boylston Ave #204
Seattle, WA 98122

1

Downtown DEIS / Height and Density Changes

WE WANT TO HEAR FROM YOU!

If you have comments about the Downtown Draft Environmental Impact Statement, please let us know:

I WOULD LIKE TO SUPPORT ALTERNATIVE #1,
WITH THE PROVISION THAT THE ADDITIONAL HEIGHT
BE USED ONLY FOR HOUSING & NOT ADDITIONAL
OFFICE DEVELOPMENT. MY INTEREST IS SPECIFICALLY
WITHIN THE DMC ZONE WHICH IS A TRANSITION
ZONE.

ALSO, WORK AT BULK FORMULAS THAT REWARD
SLIMMY TOWERS & ROOF TOP OPEN SPACE, EVEN IF
PRIVATE.

(Optional)

Name TONY PUMA

Affiliation _____

Address 94 PIKE ST. #39 Zip 98101

E-mail _____ Day phone 617.7862

Return this form to:

Gordon Clowers • Department of Planning and Development • 700 5th Avenue, Suite 2000
PO Box 34019 • Seattle, WA 98124-4019
Fax (206) 233-7883 • E-mail gordon.clowers@seattle.gov

GREGORY BRODERICK SMITH
REAL ESTATE

January 30, 2004

Dennis Meier
Department of Planning & Development
City of Seattle
700 Fifth Avenue, Suite 2000
Seattle, Washington 98104-5070

Re: Downtown Height and Density Changes EIS

Dear Mr. Meier:

We are writing to provide comments on the Downtown Height and Density Changes Draft Environmental Impact Statement (the "EIS").

1. We endorse the suggestion in the EIS that new incentives, like height bonuses, be used to promote the development of slender residential buildings Downtown (page 3-102). We suggest that the Final EIS consider specific incentives for slender residential buildings, such as:

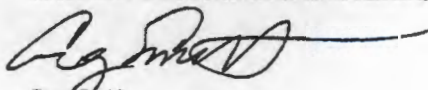
- A 40% height bonus for buildings with residential floors not greater than 10,000 square feet.
- The ability to transfer unused commercial FAR from residential sites that use small floorplates.
- Elimination of upper-level setbacks and coverage limitations for slender residential buildings.
- These incentives should be applied in all zones throughout the Downtown.

2. The Final EIS should review alternatives for transitional height increases for the perimeter of the DRC zone, where it borders zones of greater height and density.

3. We encourage the City to take a broader look at the overall Center City, and examine new development alternatives for areas, like the South Downtown, that are likely to attract much new development in the next decade.

We appreciate the opportunity to provide these comments.

Sincerely,
GREGORY BRODERICK SMITH REAL ESTATE


Greg Smith
Chief Executive Officer

810 THIRD AVENUE
SEATTLE, WA 98104-1620
MAIN 206.262.2880
FAX 206.262.2889

Gordon Clowers - My Comments about Building Great Downtown Neighborhoods Public Forum

From: "John Smith" <johnsmith1022@hotmail.com>
To: <gordon.clowers@seattle.gov>
Date: 2/26/2004 2:21 PM
Subject: My Comments about Building Great Downtown Neighborhoods Public Forum

Dear Mr Clowers

I work in the S Lake Union area and go through the Belltown area N of Pike Place market daily.

DCLU or whatever their new name is should be ashamed of itself for permitting the developers to rape and ravage the land so badly. The supermassive, tall buildings near Western, south of Mercer and the abomination coming up on Thomas and Minor should never be approved. Over development is not a good thing except for the developer and DCLU.

Overcourse developers have to develop and DCLU has to "support" it's customers so there's a lot of justifying each others' existence and conflict of interest there.

A developer puts up an abomination then moves on. He does not have to stand in it's shadows everyday (because the dang thing blocks out all the sun/daylight. He just rapes the land then moves on to the next victim (opps. I meant "project.")

JS

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Gordon Clowers

Land Use Planner

Dept. Planning & Development

City of Seattle

Feb. 27 2004

Atten. Downtown Seattle Draft EIS

There doesn't appear to be any Cumulative Effects analysis. It might analyze say, travel times at key intersections during peak hours at levels of predicted service when one or more lanes are closed for months at a time when a new development has its construction equipment on-site and construction is in progress. A concern under this scenario might be violations of the Clean Air Act. Which reminds me -- -- why wasn't there a Air analysis included in the Draft EIS ? City air isn't exactly the cleanest air and I'd appreciate to know just how bad the air's going to be getting in yearly increments as well as under worst case day scenarios. I walk everyday.

I want to express my disappointment at not finding any analysis for environmental health issues ... NOISE, TOXIC/HAZARDOUS MATERIALS, and RISK EXPOSURE.. I'd be grateful if I could be given that data. This is another area where a Cumulative Effects Analysis could provide useful information for a "livability index

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I would like to request an analysis of the current City-owned street - lighting system under a light & glare study. I hear the poles we use today are a glare and shadow hazard for both pedestrians and motor vehicle operators and that there are better street light systems than ours.

4

I'm not too happy about seeing the dire forecast for any public open space. Isn't there a requirement from the City's Comp Plan for Public Open Space? I hope the Open Space TDR idea gets put in the winning alternative. I understand trees, shrubs, grasses can actually help clean the air. If we're adding thousands of new jobs and thousands of residents, I'd like to think that the city can do better than 1.8 -2.2 acres for new designated park open space.!

5

Could you include a section for how deferred issues that were raised by the public and/or regulatory agencies will be addressed and describe the proposed temporal and spatial scales that will be used analyzing these issues. I think the traditional EIS process and expected results of any mitigation is a "one-time event " (i.e., results from intensive research, modeling, and other computations or expert opinions are analyzed, the analysis of potential environmental impacts is prepared, mitigation measures are identified, and a document is released for public review). Unfortunately, this process does not account for unanticipated changes in environmental conditions, inaccurate predictions, or subsequent information that might affect the original environmental protections. Is this how the City see s it's itself moving "Toward a Sustainable Seattle" Will there be performance measures to monitor the predicted success expected and to validate this success of the winning alternative that gets put into Code language ?

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I favor a necessary review for the Bonus Credit \$ value that developers have to pay to buy extra square footage. This review should be codified and done every 3-5 years or else tie it to a growth yearly index .

I'm more than a little worried about the transitional boundary and the bulk and mass differential between two vastly differently scaled neighborhoods. This pertains especially to the Denny Triangle and the Cascade neighborhoods. How will the City be dealing with this dilemma? Re-reading some of the mitigation strategies of Height/Bulk/Scale in section C, page 102, leads me to believe, some of these will be necessary to accomplish a compatible relationship to the natural environment , existing buildings, and proposed buildings and the streetscape. I'd be appreciative if the City could control bulk to a reasonable extent. I 'd like to see taller, more slender buildings.

Thanks

Scott Species
1814 Minor Ave. # 202
Seattle, WA. 98101

3

CLISE PROPERTIES, INC.



PROPERTY MANAGEMENT
REAL ESTATE DEVELOPMENT

Diane Sugimura, Director
Department of Planning & Development
City of Seattle
700 Fifth Avenue, Suite 2000
Seattle, Washington 98104-5070

DEPARTMENT OF DESIGN
CONSTRUCTION AND LAND USE

FEB 27 2004

RECEIVED

Re: Downtown Height and Density Changes EIS

Dear Ms. Sugimura:

We are writing to provide comments on the Downtown Height and Density Changes Draft Environmental Impact Statement (the "EIS").

It is critical that the commercial nature of the Downtown Office Core 2 ("DOC-2") and Downtown Mixed Commercial ("DMC") zones be preserved for the expansion of Downtown's commercial core. The DOC-2 zone needs to provide for the future capability of headquarters type users like Nordstrom and Washington Mutual. The DMC zone needs increased height and density as an adjunct to the DOC-2 zones.

Proposal

1. **Height.** Allow for increases in maximum height in DOC-2 zones up to 650 feet, and in DMC-240 zones up to 400 feet. These height increases could be area-wide.
2. **Density.** Provide for increases in allowable density as follows:

<i>Zone</i>	<i>EIS Alternative 1</i>	<i>New Proposal</i>
DOC-2	13-14 FAR maximum	16 FAR maximum
DMC	10 FAR maximum	13 FAR maximum

Again, these proposed density increases could be area-wide or could focus on localized sites within each zoning designation area. Increased densities will help to attract thousands of new jobs to Downtown Seattle.

3. Provide for the ability to transfer commercial development rights within the DMC and DOC-2 zones. This important part of the Denny Triangle Neighborhood Plan will help create open space and housing.

4. **New Bonuses.** By increasing the maximum FAR, new bonus tiers could be created. This additional FAR bonus value could be allocated to a range of important public benefits, including low-income housing, open space and neighborhood amenities.
5. **Building Design.** Eliminate restrictive building regulations, such as upper-level setbacks and coverage limitations. These regulations, which predate the City's Downtown design review process by a decade, promote uniformity in the massing of Downtown buildings. The design review process tends to foster improved and imaginative design, and provides more flexibility than the current Code.

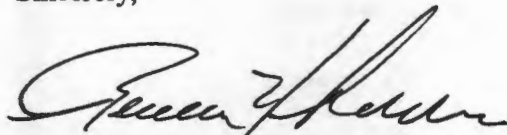
Benefits

The potential benefits of these proposals will be significant for the Downtown, for Seattle as a whole and for the region in general. These benefits include:

- Increased employment production Downtown;
- Promotion of new residential development;
- More efficient use of existing and proposed mass transit options;
- Greater production of low-income housing;
- Provision of more open space Downtown;
- Enhanced building design;
- Increased tax revenue;
- Optimal use of new infrastructure, including several billion dollars in high-capacity transportation improvements Downtown.

In conclusion we ask that the Department of Planning and development take quick action in processing the DEIS and the resulting legislation. We believe it is critical to Seattle's future economic viability as well as the city's livability that these common sense changes be made to reflect our new urban vision of the city

Sincerely,



Richard H. Stevenson
President and COO

**The Power to Change
The Power to Build**

January 20, 2004

City of Seattle
Department of Planning and Development
700 Fifth Avenue, Suite 2000
Seattle, Washington 98104



Attention: Diane Sugimura, Dennis Meier

Subject: Downtown Height and Density Changes DEIS

Dear Diane and Dennis:

During the preparation of the Downtown Urban Center Plan, the urban village neighborhoods and the Downtown Urban Center Planning Group worked diligently with city staff to envision how downtown could continue to sustain its growth as the pre-eminent urban center for the region. At the same time, the citizen and professional planners wanted to ensure that downtown would also become a fabric of communities accommodating diverse interests, values, and needs. The underlying framework of land use policies and regulations controlling private investment throughout Seattle is very complex, and for downtown, this complexity can be burdensome to everyone involved in the design and development of projects, whether commercial or residential. The 2001 amendments to the bonus and TDR code provisions were a welcome start to the daunting task of addressing this complexity.

The current prospect of changing downtown height and density provisions of the code is another building block of what many hope will be a continually evolving process. The DEIS provides a valuable snapshot of conditions ranging through all of the usual environmental "elements", and also the important factors of real estate economics and pedestrian amenities. The market's response to public regulations over a long time period is very difficult to parse. So, the DEIS helps us to understand the relationships between the variables and how they may combine to form the "big picture".

The analysis indicates that there are few major differences between the alternatives. It appears the most significant choice is between in the degree of scale between the office orientation of the "High End" Alternative 1 and the "Residential Emphasis" of Alternative 3. Probably the most alarming of the few "significant unavoidable adverse impacts" revealed is the decline of public open space, per capita, under all alternatives.

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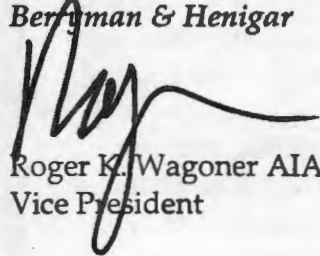
So, while the DEIS provides an excellent source of information regarding current and possible future conditions in the downtown, it leaves the decision-makers with an important question: *No matter which of the alternatives is selected, how will the City proceed with needed changes to land use, transportation, design, public services, and other investment strategies, policies, and regulations in order to foster the quality of community development to which we aspire?*

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I hope that the FEIS will be more assertive in identifying a "preferred alternative" that includes a strategic approach to linking the regulation of private development with public investment and community development funding so that the downtown can grow, but in such a way that the neighborhoods will also continue to be replenished.

2

Sincerely,
Berryman & Henigar



Roger K. Wagoner AIA, FAICP
Vice President

GORDON CLOWERS - IWALL COMMENTS DEIS DOWNTOWN ZONING

From: "irene wall" <iwall@serv.net>
To: <Dennis.Meier@seattle.gov>
Date: 2/29/2004 11:03 PM
Subject: IWall comments DEIS Downtown Zoning
CC: "Tom Rasmussen" <Tom.Rasmussen@seattle.gov>, "David Della" <David.Della@Seattle.gov>, "Jean Godden" <Jean.Godden@seattle.gov>, "Jan Drago" <jan.drago@seattle.gov>, "Jim Compton" <Jim.Compton@seattle.gov>, "Nick Licata" <nick.licata@seattle.gov>, "Peter Steinbrueck" <peter.steinbrueck@seattle.gov>, "Richard Conlin" <richard.conlin@seattle.gov>, "Richard McIver" <richard.mciver@seattle.gov>

I R E N E W A L L

February 29, 2004

Mr. Dennis Meier
 City of Seattle Department of Planning and Development
 700 Fifth Avenue, Suite 2000
 Seattle, WA 98104-5070

Re: Comments on DEIS for Downtown Height and Density Changes

Dear Dennis:

The *bulk and scale* of the DEIS itself portends the "supersizing" of downtown Seattle envisioned under Alternative 1 yet the final EIS should expand to include analysis of other alternatives to achieve the underlying goals leading to these proposals. Additionally the final EIS should clarify what those underlying goals are and what the public interest is in achieving them. Given that the projected employment and housing growth targets can be met under Alternative 4 (existing zoning), what is compelling a reconsideration of downtown zoning at this time? In other words, what is the purpose and need for the proposal and what public benefits will result?

The final EIS should address the overall capacity of development in downtown in light of proposed amendments to Seattle's Comprehensive Plan to incorporate the WOSCA site and South Lake Union (SLU) into the downtown urban center and to change land uses in the Interbay area. According to the December 2003 report by the Seattle Office of Policy and Management, SLU alone is expected to accommodate 23,000 new jobs and 11,000 new housing units. These represent a significant percentage of the total goals for downtown. What need is there for additional height and density incentives in any other areas downtown under these circumstances?

The FEIS should also address how simultaneous growth in SLU and other areas downtown will affect the need for capital investment in electrical substations and transmission/distribution facilities. The DEIS states that a new substation to serve downtown is needed by 2012. Will this be the new SLU substation or will the projected growth require more than one new substation to serve downtown?

Please clarify the net loss of off-street parking spaces under the alternatives and whether or not there is sufficient transit capacity and routes to meet the demand for displaced cars. Are current development regulations sufficient to prevent the first floors of new buildings from becoming garages rather than below grade parking?

The DEIS identifies many important and unresolved issues of public policy for managing growth in Seattle. The relationship between downtown growth and meeting growth (jobs and housing) goals in other areas of the city needs to be considered. There are many under performing areas of Seattle, particularly in the East/Central, Southwest and Southeast sectors. The FEIS should consider an alternative which provides height and density increases for downtown properties in exchange for developer investment in urban villages outside downtown which are not meeting their employment and housing goals under the

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Comprehensive Plan. This way the engine of downtown development is harnessed for citywide benefits.

Similarly, the FEIS should identify an alternative which links the proposed height and FAR increases to the provision of needed amenities such as significant parcels of downtown open space or accommodating monorail stations within the footprint of new developments.

The proposed broad upzones contemplated, particularly Alternative 1, will constitute a major grant of increased value/wealth to owners of downtown parcels. At the same time, the DEIS identifies many issues and goals related to "livability" and "quality of life" impacts which come with increased density. The mechanism of a contract rezone provides for a balancing of benefits between private development interests and the public realm. The FEIS should include an alternative, which evaluates the use of contract rezones as a means of securing public benefits in proportion to the value of the increased development capacity. If the overall goal of these proposals is to jumpstart further economic activity downtown, contract rezones have the additional benefit of providing more certainty that the development activity will occur within a specific timeframe.

The DEIS provides an interesting timeline from 1999 of increasing TDR, TDC and outright zoning changes which were provided as an incentive to housing development downtown, yet the Denny Triangle area has only achieved 8% of its targeted 20 year growth in housing since 1994 despite having huge opportunities for mixed commercial and housing development. That history suggests that zoning incentives are insignificant motivators compared to market forces and calls into question the necessity of any such upzones to achieve housing production goals. It may make more sense to downzone areas in the Regrade to produce "human scale" buildings and brownstone style developments and use deferred property taxes to provide incentives for moderate income housing in that area if necessary. These upzones appear to be too crude an instrument to secure the variety of development desired downtown including housing for families, and the types of institutional and recreation uses which families with children need.

The Final EIS should provide more analysis of the costs/benefit of the proposals, including an estimate of the private economic value of the increased development capacity provided under these rezone scenarios and new revenue to the city resulting from the increased development capacity as well as the cost in public infrastructure for the alternatives. This cost/benefit analysis will inform discussion of implementing development impact fees in Seattle, an item on the work agenda for the Department of Planning and Development.

General Comments:

The view protection chapter suggests that eliminating SEPA view protection entirely from downtown development as a possible mitigation. I entirely disagree with this approach! Instead the long delayed DCLU work program to finish the SEPA view protection study begun in 2001 should be completed and specific protections for views of the skyline and natural features should be instigated for conditioning MUPs and for possible downzones. All of the view impact mitigation identified on page 3-146 and 3-147 should be implemented. Similarly the long delayed review of street and alley vacation policies should be completed before any more alley or street vacations are granted.

Some of the figures in the Appendix K are missing from the PDF files posted on the website. This should be corrected.

The notion that the proposed FAR and height changes will result in "Vancouver style" development has been debunked in the DEIS but need to be made explicit in the Final EIS because public officials are still suggesting in public comments that skinny towers with lots of open space will result from these changes. This appears to be entirely false.

These rezones should be conditioned to protect existing low income housing from being lost to redevelopment, particularly where there is a history of public subsidy of these rental units.

Thank you for the opportunity to comment on this DEIS which is a very informative and provocative document.

Sincerely,

Irene Wall

c: City Council

Gordon Clowers - Feedback on Downtown Development: Studying Possible Changes

From: "David Williams" <dfw23@hotmail.com>
To: <gordon.clowers@seattle.gov>
Date: 1/23/2004 11:33 AM
Subject: Feedback on Downtown Development: Studying Possible Changes

Hi Gordon, the web page at <http://www.seattle.gov/DCLU/Planning/Commdev/Downtown/default.asp> doesn't make it clear who we should contact with our input on the Downtown Development Studying Possible Changes to Height and Density Limits. Please forward my input to the appropriate person.

My Input: I support taller narrower residential towers in some or all of the downtown neighborhoods as a way to prevent the building of more broad and squat buildings and to increase residential density downtown. I support changes that will make the downtown neighborhoods more liveable.

Thanks,
David Williams
316 11th Ave E
Seattle, WA 98102
206-329-2009

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Appendix A

Transcripts of Two Public Meetings and Responses to Comments

APPENDIX A - TRANSCRIPT OF TWO PUBLIC MEETINGS

Downtown Height and Density Draft Environmental Impact Statement Public Hearing Comments - December 15th, 2003

TESTIMONY

Richard Stevenson

I'm Richard Stevenson from Clise Properties, and we've been a part of the Denny Triangle and the Denny Triangle neighborhood for a long time. Specifically, I think Alternative 1 doesn't go far enough. The Downtown Core is the economic engine of Seattle. It's the best thing that we can do for our tax base. It's the best thing we can do for our environment, by creating jobs and housing closer to one area and have people like John who can walk to work, if you so choose. And we're also spending \$7 billion on public transportation which is all aimed at having public transportation move people in and out of the city, create jobs and homes in a dense area. And, you know, that has been sort of the long term goal of the City, to have this growth in the dense area.

But the reality of what's happened is in the last 6-7 years over 50% of the commercial office space has been in the Downtown or near-Downtown area, has been outside of the Downtown area. And the reason it's done that is for economics. You can build less expensive buildings that are smaller, that have as much parking as they want, and that may be fine for some neighborhoods and it may be great for the City. But, by inducing growth and development elsewhere, we aren't creating affordable housing, we aren't capitalizing on the public infrastructure, that we need, and we aren't, in my opinion, taking advantage of the best history of what Seattle and the future has to offer. The intent of the Denny Triangle Neighborhood Plan is to increase heights and densities so that we can have commercial office space moved around within a site, we can have the space that it was moved from, either for housing or for open space. When we created 1707 Seventh, we took commercial office space, moved it across an alley, and created 65 units of affordable housing. While doing that, we also left view corridors.

The other thing that I don't think the EIS addresses is the issue of upper level setbacks and the prescriptive code. Some of our newest and best buildings in Downtown Seattle are going to be the new Federal Courthouse, the public library, the new municipal campus, and none of those are written under the prescriptive code. That code says that when you go up a certain height you have to step the building back in,

and so you end up with all of these wedding cake looking buildings, which won't allow taller, thinner buildings, won't allow great architects to get together with developers and create interesting buildings that would then go before Design Review. And instead of having a specific descriptive code of how these setbacks should be created, we need to have a larger guideline of "what is good design" and "what's good for neighborhoods" so we aren't building these short fat towers that block views and squander land and don't create affordable housing.

So, to my way of thinking, any kind of a downzone is a horrible mistake. We need to have height limits which probably should exceed [Alternative] #1. I think that in order to incentivize commercial development in areas where we want it, you need to have an incentive. Currently, we would pay about \$23 a foot for about 60% of any commercial office building and that would go in the form of housing or TDRs. And that's fine. But if you're building outside of the Downtown core, you aren't paying for any of that. So you have expensive buildings on expensive land, with 60% of it paying about a 10% surcharge to build the space. And I would just suggest that, you know, they don't "pencil" when it comes to designing and building a building, and then having someone pay rent that will support that kind of expense. So we need to incentivize commercial development that--a byproduct of that commercial development is high-rise housing that may be market. It will also most definitely be affordable housing, and I think that middle strata, you know, which is pretty elusive, is workforce housing and that will come along with it. Thank you.

Lyn Krizanich

I am Lyn Krizanich. I'm from the Denny Triangle. I'm here tonight in place of Dana Bollinger, our current president. She couldn't be with us tonight, so I'm speaking on behalf of her, and of course our entire neighborhood association.

The Plan was completed in '98, the City Council approved it in 1999. Our Plan adopted the City of Seattle's targets of accommodating 23,000 new jobs and about 3,800 new residential units by the year 2014. In order to achieve these goals, our plan, our main priority, top priority was then and is now increasing height and density in order to encourage commercial development, leverage that development to create housing, and particularly for all income levels, but most especially for the low moderate and affordable housing where we have a large gap. The Denny Triangle Plan also called for reducing or relaxing upper level setback requirements.

As you know, we've waited a long time for a plan to be implemented. In 2001, the Downtown TDR and Bonus program was amended as Phase One in the step toward implementing the DUCPG or Downtown Plan and the Denny Triangle Plan. We've waited two years for Phase Two, which is increasing the height and density. Unfortunately, in the interim we not only missed the opportunities during a good strong economic cycle, but by having only those amendments to the Bonus and TDR provisions as Phase 1, it actually served as a disincentive to development.

So the Draft EIS Alternative #1 is a composite plan. It doesn't clearly represent the Denny Triangle or the DUCPG Plan. So we suggest that the EIS consider increasing height and density incentives outlined in Alternative #1 to produce significant quantities of new low-income housing Downtown and to accommodate more jobs. Current height and density restrictions restrict opportunities for additional housing and open space opportunities as well. Another reason for the EIS to investigate greater height and density is to make better use of the investments in mass transit, as Richard talked about, that are happening throughout the Downtown. The EIS should address the need for greater design flexibility, and again I'd like to echo on those comments that the current setback requirements have added unnecessary cost and created the blocky, thick look-alike buildings. In summary, the EIS should honor the neighborhood planning process, and we'd like to get prepared for the next economic cycle so the Denny Triangle can help bring new jobs and residents to Downtown.

Catherine Stanford

Hi, I'm Catherine Stanford and I am currently the chair of the Downtown District Council which represents the five neighborhoods that make up Downtown, and am also -- have taken over the stewardship responsibilities of the Downtown Urban Center Plan, which process I also chaired. We really appreciate the opportunity to be able to comment tonight and also appreciate the fact that we are moving forward with this. I won't go into detailed history in the three minutes or so, but I do want to say that it was really in 1997 that we started to identify the issues that led to our land use proposal. And our land use proposal was really the cornerstone of our plan and our planning process. And that's one thing that I would really encourage in looking at the EIS also is, in thinking about these things, that they form a comprehensive whole. We can't talk about downzoning or changing land use in one area without taking a hard look at what impact that might have in another part of the plan. We, as Lyn mentioned, we went to the City Council and the Plan was adopted in 1999. And the Plan was really linked to accepting the Comp Plan

targets, and not only "accepting" but I would say "embracing," because it was a consensus that we built Downtown in looking at the Comp Plan growth targets particularly jobs and housing, and saying the Downtown is the area to accept those kinds of growth targets. And looking at that also, hopefully that would kind of work to support some of the outlying neighborhoods who didn't want that kind of density in their neighborhoods. The vision was again to accept it, it was the cornerstone of our Plan.

And really one of the things that we talked about was "Downtown is for everybody" and that's how we got to the low-moderate housing. There were a number of studies that we did that showed that there was funding for the kind of very low housing that was available, and that the market rate would take care of itself. And the critical piece is really for the "low and moderate" housing or the "working" housing. We do want to make a couple comments in that context, that a number of us were disappointed that the EIS, although it was identified as Alternative 1, was that the DUCPG Plan - that it didn't specifically include all of the elements of the Plan as it was proposed. And it certainly wasn't the intent to have the level of height that is shown along First Avenue in particular. And as Lyn mentioned, at the time the Plan was accepted by the City Council and then in 2001, Phase One was adopted with the understanding that Phase Two would come in a timely manner after that. Also as Lyn and Rich had mentioned, by not implementing Phase Two - that acted as a disincentive to developers. They really needed - again this is a comprehensive whole we were looking at with this, and all the pieces tie together. One of the things we talked about in the planning was that in order to meet these growth targets to fund low-moderate housing, that's 50-80% of median income, and to have quality development, we needed to attract quality developers and developments to the Downtown. And certainly, developers have a lot of other choices of places to go other than the Downtown area. And we wanted to make sure that they came to Downtown, that they were welcomed down here and even talked about "let's market Downtown as a great place to come and make developments." So, certainly with having disincentives of either downzoning or in the disincentive of not passing the Phase Two immediately, I don't think that particularly encourages development in the Downtown core. I encourage you to move forward with this process. I know that there are some other thoughts about some other things that we might do. But I think that let's move forward with this and get some zoning and changes in place so that we can start looking perhaps at other areas or other zoning or land use changes.

And John, I appreciate your comments about looking at the Center City. I think as you know and many of you in the room know, the

Downtown District Council has hosted forums over the last two or three years that brought the Center City neighborhoods together, and we certainly recognize as we did with the five neighborhoods during the Downtown planning process, that we have some real similarities with our needs, and looking at this as more "the urban center as an extended area." So I appreciate that that's part of the next steps to look at that. But I encourage you to move forward with this.

John Rahaim: Could I ask you just one clarification question? You said that you didn't anticipate - the DUCPG plan didn't anticipate - the height along 1st Avenue. Do you mean that the Alternative is showing a height that is too tall or too low on the waterfront?

Catherine Stanford: It was higher than what we had proposed for First Avenue.

Rahaim: You proposed a lower height than what Alternative 1 is showing?

Stanford: Right.

Rahaim: Thank you.

Kate Joncas

I'm Kate Joncas, president of the Downtown Seattle Association. We do not believe that the alternatives in this EIS went far enough to meet what was our neighborhood plan vision for high-quality dense neighborhoods in the future with jobs and housing appropriate to each neighborhood's needs and wants. We just don't think this went far enough to what our vision was when we were doing this. There have been significant changes since we started talking about this in 1997. I just went back to look and it has been since 1997 since we've been talking about this. And it's a completely different Downtown and I think that the community - not only Downtown but the community - has a different vision I think of what Downtown could be. And this reflects what we knew in 1997. You know, we're very supportive of that neighborhood plan, participated in it very strongly, with its priority for housing and jobs growth. We really wanted to have a plan that would help us concentrate regional growth in Downtown to prevent sprawl, to make it more attractive to develop in Downtown than in Bothell. And we don't think this DEIS goes far enough in helping us to do that in this environment that we have right now.

Think of what's happened. We weren't even thinking about biotech in South Lake Union then, we weren't thinking about the visions that we have seen about South Downtown and Pioneer Square and South Pioneer Square. We've had a lot of discussions with the community about learning from Vancouver. We talked about Vancouver a lot in our planning process. That was our model, in terms particularly in housing growth, much more dense than we are. And now the whole community has been talking about that. And the billions of dollars in transit that were beginning to be talked about then. So this is really a different environment. I think we need to think about "are we doing the kind of changes now to maximize all these opportunities that are happening, and into this different kind of environment?"

In reading the DEIS, actually I have to say, from our point of view of doing the neighborhood plan, it was very concerning to see density equated with a poor pedestrian environment. To make conclusions that if you increase density in the Denny Triangle, which was specified as "bulk," that would result in a lower quality pedestrian environment. That's clearly not what we were thinking about in our neighborhood planning process. We had a lot of discussions about "what are the best cities that you go to where you have a great pedestrian environment?" And we would think of London, and we'd think of San Francisco, and we'd think of Paris and we'd think of Vancouver, clearly much more dense cities than we [are]. So from our neighborhood planning view, density is absolutely equated with a much higher quality pedestrian environment. So we want to have that pushed back into the plan.

And Gordon, I know you were talking technically, but I can't tell you how difficult it was to hear you say that the "worst case maximum growth." To us that's the best case, we were absolutely looking - and I know that's a technical term in the plan - but to us that's the best case and not the worst case. So we have to be careful about how we talk about that.

Finally, in moving forward for this, a couple of things that we would like to discuss with you, and work into how we go forward. Let's take another look at the options presented. Do these recommendations really take us where we want to go in terms of the quality Downtown environment that we want for the future? Second, we want to continue to link job growth to affordable housing. We spent a couple of years talking about ways to get more affordable housing in Downtown, and we don't have a lot of incentives, we don't have TIFs, we can't make loans. But one way to do it is to allow developers to buy height, and put all that into a fund for affordable housing. We need thousands of units more affordable housing. So we need to link that to job growth,

and we want to continue that strong link in the plan. That's a really easy way, easier than others, to get that housing and we really need it.

And then last, I'd really like to move from reactive in planning, although I know that is part of the EIS structure, to proactive. Let's not talk about what growth we think is coming or that we expect, let's talk about what growth we want, and where we want to be, and "how do we use this tool that we have to get from here to there?" To have the kind of - not like [the growth] we think we're going to get or have to accept, but where do we want to be, and what we want it to look like. So, thanks for the opportunity to talk.

Jim Ferris

I'm Jim Ferris and I'm the executive director of the Housing Resources Group. We're a non-profit affordable housing organization that has been working in the Downtown neighborhoods since 1980. We have been very fortunate to have been using the TDR and housing bonus program over that time period, to serve the Downtown community with affordable workforce housing. Approximately 75-80% of the residents that live in HRG's buildings work Downtown, so they walk to work or they take the bus and get to their jobs. And we believe that that housing strategy has been really important to not only creating neighborhoods Downtown, but also creating a synergy between commercial development and residential development, and how those two are really inextricably tied.

I was just tallying up - I was trying to determine how many different affordable housing projects that we have been involved with that have used the program. We've actually used the TDR program five times, and probably one of the more notable TDR transactions that occurred is the Eagles Auditorium, where HRG and ACT Theater are actually - would coexist in the same building. And without the TDR program, that would not have been possible. We have recently completed two new-construction affordable housing projects in the Downtown, one in the Denny Triangle, in a neighborhood that was very embracing of affordable housing, as well as in the retail core, at the corner of Third and Pine. The project is known as the Gilmore. And that really talks about having synergy of affordable housing near jobs, and as soon as that project was completed, it only took as many times as we could schedule move-ins and using the elevator to get families and individuals into that apartment building. So, people want to live Downtown and people with lower-income jobs want to live Downtown as well.

So, we really see that the opportunity right now to do more now is evident. I would say that with the Gilmore project, the challenge that we have had, and the city has been very helpful in doing this, is that we have not been able to find a commercial development that is willing to buy our housing bonus that we have generated from that site, because of the lack of moving forward on this plan. We have been looking for a commercial developer for over 3.5 years, but until this program has been defined and implemented, many commercial developers, and especially office buildings in the Downtown neighborhoods, were unwilling to move forward until they saw that there was an incentive for them to actually create the office development and the retail development and the hotel development that would actually have an opportunity to purchase that housing bonus.

So, I would ask you to reconsider the alternatives, and I reiterate really what both Lyn and Kate have said that, Alternative 1 doesn't really get to the original Downtown Plan or the advisory committee's role, in which I participated. And I'd actually ask DPD to consider as we look at whatever alternative will move forward, is that we actually commit to doing that in 2004. That I think time is wasting, and that commercial development is still going to sit on the sidelines until this program has been defined, and I think we're losing the opportunity to create more jobs and more affordable housing Downtown until this program is actually implemented. So, thank you.

Joe Quintana

I'm Joe Quintana. I reside at 2053 41st Avenue East in Seattle. First, I want to thank the Mayor and the Department for actually bringing this up and finally getting underway with this. It's over-needed. And, one suggestion for improvement is that the EIS discuss the need and impacts in a larger context. Right now it's confined to the study area. And yet, it does not recognize under growth management or under just our own common sense, the unique role that Seattle plays under growth management in the entire region in terms of its jobs, housing and other development goals. In that discussion, I think you should consider a number of things. One is that the Growth Management Act and the other policies since then have always reflected the reality that it's either "you grow up or you grow out." And if we do not grow up in Downtown Seattle, given its unique place, we will grow out, increasing sprawl, increasing the environmental degradation, decreasing the effectiveness of mass transit, and lessening of opportunities for affordable housing for those that can't - don't have mass transit capabilities in particular.

On the flip side of that, I think that the EIS should discuss the context for why this is even being proposed. It basically says that it is, but it doesn't say it is being proposed for these reasons. And those would be the benefits, some of which I've outlined and others that exist that you're well aware of. Frankly, I think it should also discuss the various planning processes, rather than just enumerate them, discuss the various planning processes. How they occurred, including the neighborhood planning processes, like the much-referred-to Denny Triangle planning process, and the blood, sweat and tears that went into their development and why they should be honored.

And additionally, I think it should discuss the impacts - I know you can't go and study the whole thing - but just discuss the potential impacts outside the Downtown area, particularly on the neighborhood character of other neighborhoods in Seattle, if in fact height and density were not increased Downtown.

On another point, the density transfer of development credits [TDC], if there was a role of change. Frankly, as I read it, the assumptions in the DEIS are extremely liberal. At a very minimum, the "would" increase capacity by X number of units in Alternatives 2, 3 and 4 should at a minimum be "could" since experience to date suggests that number may well be zero. And, if the developers I know and talk to perhaps are right, it will be zero, that there's just not going to be any takers. And it's assumed that they will in fact be somewhere near that capacity, or it appears to be, as currently written. When in fact they may not realize that, and if not, then Alternative 1 looks less-has less impacts in terms of the affordable housing question, because almost all of the additional housing in [Alternatives] 2, 3 and 4 are a result of the TDC program as I read it, and beyond in some cases. So those are some of the specific comments. Lastly - it's not lastly since I wrote some other things - is the need for greater design flexibility. I don't know if the DEIS can specifically cover it, but it's certainly disgusting, because - ugly and expensive really shouldn't be an option, which is sort of what we are getting right now. And from the work of a number of us, we know that Design Review is a superior regulatory framework for this sort of activity.

And then lastly, I would say the mandatory mixed-use housing really is unnecessary, won't work, really hasn't worked in the areas where it's been tried. You know, we've had all sorts of Murphy's Law of unintended consequences, as I know the Department is well aware of. And so, trying to force it in an area like the Downtown area, with its unique role in job growth, and the ability, the proven ability in some areas already, through TDRs and other things to, you know, have

affordable housing, trying to force it you could very well visit those unintended consequences once again. So, thank you very much.

Adrienne Quinn

Thank you for the opportunity to present testimony tonight. My name is Adrienne Quinn. And I also wanted to thank City staff, in particular Gordon Clowers and Dennis Meier for several years of very hard work on this EIS. I know it was a monumental undertaking and many of us having been waiting for this whole process to conclude as much as seven years. So, we're looking forward to our neighborhood plans being implemented. I want to talk about two things. First, I wanted to put my comments in context and secondly I wanted to make three or four points about the EIS itself. First, I was the chair of the land use committee for the Downtown Urban Center Planning Group and as you probably know the Downtown Urban Center Planning Group was a coalition of all five Downtown neighborhoods. And the purpose of this was to make sure that all the five Downtown plans were coordinated, to make sure that we didn't have conflicts on borders and things like that. And so it was in that context that we developed our plan. That's why it is with some disappointment that I see comments in the EIS about impacts on Belltown from Downtown height and density increases. Because in the DUCPG plan we had a lot of provisions and a lot of thought went into making sure we didn't have those kinds of conflicts.

Secondly, the DUCPG plan was also done in the context of Growth Management Act and all of the Comprehensive Plan for Seattle. And so for that reason, I think it is very important that the EIS be amended for the Final EIS in the following way. I think that one of the primary things that is missing is a discussion about how these changes to the Downtown would affect all of comprehensive planning and all of growth in all of Seattle. Because you can't just look at the Downtown plan in isolation. So, for example, if Downtown is able to take on more development and the incentives are in the right place to take on more development, does that release pressure on other neighborhoods so that we can maintain the character of single-family neighborhoods throughout Seattle? Otherwise what we experience is lots being divided smaller and smaller, pressure to develop critical areas, and if we're able to have that housing and job growth Downtown, then we will fully implement the purposes of the Growth Management Act. Also, with regard to commercial development, if we don't have incentives to have commercial development in Downtown: we see what happened in Fremont for example, where we have several large structures along the -- such as the Adobe buildings there -- where we don't have the infrastructure to take care of commercial uses there, we don't have the

transportation, we don't have the other infrastructure, but we've created incentives to do very large commercial development outside of the Downtown core, and does that fit within the larger Downtown Seattle Comprehensive Plan? Another point that I think that you should consider and should be changed for the Final Environmental Impact Statement is building on some of the comments that John made at the beginning. I recognize this EIS was begun quite awhile ago, but since that time Sound Transit has received its funding, Monorail is moving forward, the Streetcar has gotten partial funding. So I don't think that the statements in the EIS currently that say automatically there is going to be adverse traffic impacts, still hold value. I think there needs to be a supplemental analysis in the Environmental Impact Statement to talk about Sound Transit, Monorail, Streetcar. Because if all of those transportation systems are put in place, then it is far more appropriate to have even a higher level of density Downtown, and we will not have those adverse impacts. And this again goes to my first point, which is it relieves impacts on other neighborhoods.

A third point I'd like to make is, right now, because only half of this plan has gone into effect, we are not seeing much development in terms of the 50-80% for low-income housing. Right now under the housing levy dollars, 50-80% levy dollars can only be used outside of Downtown because it was thought that the bonus and TDR money from Downtown would be able to be used to create those housing units Downtown. However, because we've only implemented half of the proposed neighborhood plan since 1999, we're not seeing that development going forward.

And finally, with regard to the TDC program, I see a lot of discussion with regard to the TDC program, and a couple of points I'd like to make with regard to the TDC program. First, though I believe it was well-intentioned at the time that it was developed, I think it's significant that no one has developed under that program. I also think it is significant that it was not part of the neighborhood plan and that the City has spoken strongly of getting feedback from neighbors and in fact the neighborhood plans have talked about creating low-income housing, and the TDC program doesn't really necessarily have benefits to Denny Triangle - it's for preservation of rural land in King County. So, I think in terms of consistency with neighborhood plans, it's far more important that we focus on: "is the neighborhood plan, and are the development proposals currently being considered?" and "does the EIS adequately consider how these programs will actually create the jobs and housing Downtown that the neighborhood plans have sought?" Thank you.

Jack McCullough

I'm Jack McCullough and I signed up on the sheet. I'll find something new to say here. I kind of feel, looking at this crowd, like I'm teaching at a college class here. Everyone's sitting in the back of the room, and the front seats are empty. I will be supplying some written comments later on, and tonight I just want to talk about three things, which actually all of them touched on already--History, Density and Opportunity.

Let's look back at history for a second. The Downtown Plan under which we're currently operating was initially adopted in 1985 after a three-year effort: it's called the Land Use and Transportation Plan. And in 1985 it represented about a 30% downzone in the major commercial development zones Downtown, over what had been possible pre-1985. Four years later, we saw another downzone, in the form of CAP, which was another approximately 30% downzone. So now we sit here in almost the year 2004 looking at permitted densities Downtown that are frankly less than half of what was possible 20 years ago. And what's happened this 20 years as you've heard and more recently is that we're investing 3-4 billion dollars or more in light rail and commuter rail to serve Downtown from the region, a billion and a half dollars for the Monorail, and all the other transportation infrastructure improvements that you've heard about. The density is something that -- you know, it's trite to say -- that people believe that growth management is a great thing as long as it's not in my neighborhood. But I think most people will agree that if density belongs anywhere in the region, it belongs Downtown. Downtown is just under 2% I think of the land area -- is that right Kate? -- [but] you find 40% of Seattle's jobs and 22% of its tax generation revenue.

You find HOV and transit penetration rates that are probably 7-8 times what you'll find anywhere else in the region. So if we're serious about trying to combat sprawl and create open space and protect our neighborhoods and protect other outlying communities -- then this is the place that density belongs. And we've had a lot of arguments about this infrastructure I mentioned. About light rail, monorail, and there've been pitched battles about whether to build many of these improvements. But those really have been resolved now. And so the big mistake for us would, after having seen those decisions made, be not to build the city that this infrastructure requires. And that is I think really the challenge the city faces today and is represented in this EIS. So from a density point of view, it really would be I think fundamentally wrong to look at downzoning any part of Downtown such as Alternative 3 discusses, and the EIS should really look at the impact that would have on shifting density, housing, jobs,

outside of the Downtown. Because that's what would happen into Seattle's neighborhoods and the suburbs.

And as you've heard tonight, Alternative 1 really doesn't even get us back to 1985, doesn't get us back to where we were 20 years ago, when we didn't have light rail, commuter rail, monorail on the horizon. So, I'd strongly suggest that we look at greater opportunities for height and density in the key Downtown [areas] - the Denny Triangle, the DOC1, and the DMC, the other key areas Downtown.

Finally, the third thing - Opportunity. Development Downtown is all about windows of opportunity. And the real enemies of a successful Downtown I would say are half measures and delay. The buildings that are built Downtown, that have been built, and that will be built in this next cycle will survive well into the 22nd Century. And so the real risk to us as a region is not that we build these buildings too big, or too dense or too tall. The real risk is that we don't build them big enough to serve the region from a long term point of view. And these development cycles that we see really only happen - although it feels like when we're in Downtown there's building going on all the time - these cycles only happen once every ten years. And so you have a limited window of opportunity when the stars between tenant availability and capital availability coincide to actually attract new investment to Downtown. And that is when you forge the changes that can make a new life in Downtown possible. And so you have to be ready to take advantage of those opportunities. My suggestion would be that the FEIS look at, therefore, exploring alternatives for enhanced density and height beyond what is set forth in Alternative 1. And secondly, that we all work with all deliberate speed we can. As we've heard tonight, if this measure is not enacted in 2004, then I'd think you run a serious risk of - the city will again as we did in 2001 - missing the opportunity to influence the next development cycle, which will mean we will be waiting another decade. Thanks.

John Pehrson

My name is John Pehrson. I'm the chair of the Belltown Housing and Land Use Committee. Everybody's broken the rules so far - nobody has been three minutes. But at least I'll use some charts. I want to use them because I made them in my basement and on the dining room table, with the help of Kinko's. And I'm kind of proud of them. I represent not only the Belltown Housing and Land Use Committee, but the Belltown Community Council. We took a position on this study about two years ago in writing and our position hasn't changed. We recently reviewed it this month and we still all felt the same. So I want to advocate that. First I want to say, about the City Center plan, this

is what Belltown is really working toward, what you said. Because we know more people will give us more security, more active streetfronts and more business. A great neighborhood, not one with bulky tenements, but a great neighborhood, and housing. And just to indicate that we walk what we talk, in the last year in Belltown there's only been four buildings of major consequence changed, all of those low-income housing. And we have two more on the burner now. So, you know, that's what we are all about.

Now in contrast to the other people who took a broad position, I'm going to take a narrow position, not because I'm a narrow person, but I'm representing Belltown. I think I talk loud enough that your recorder will hear me. What I'm talking about is a small corner of Belltown in the south part of Belltown that is currently zoned DMC 240'. It is proposed in Alternative 1 that that area be increased to 312 feet and with essentially no constraints on residential development, it would result in buildings that are 312 feet high and built essentially lot line to lot line. That is not the kind of Belltown that we want.

A few charts, and I will give you copies of all these. And you cannot see these, but maybe you can get the trend. That currently what's allowable in the square feet above 125 feet in height, in the DMC office is 8,000 square feet on a 20,000 square foot lot, 41% [coverage]. In DMR residential: 8,000 square feet on a lot that's 20,000 square feet. In DOC 2 Office: 8,000 square feet on a lot that's 20,000. In DMC for residential: 16,000 square feet or 82% is allowed. Interestingly enough, that's 82%. If the lot were just a little smaller like 15,000 [square feet], it could be 100%. The zoning currently allows you to build straight up on [a] 15,000 [square foot lot]. I live in a highrise that's on a 17,000 square foot lot. It happens to cover 41% of it. So this is what we currently allow. Now it's not theory, it not abstract. You can look around in Seattle right now. The Centennial Tower, which all of you know at 7th and Virginia, is built essentially from lot line to lot line with 16 feet space so they could put windows in. Envision, any of you who know Denny Terrace, have you seen Denny Terrace? It's at Melrose and Denny. This is a bad picture of it. Imagine it two or three times that high and that same width. So next time you drive across the freeway on that street look at Denny Terrace and say "wouldn't it be nice if it was two to three times as high?" That's what's being proposed. Again, it isn't abstract.

One more point. We are continually talked [about] here in Seattle and badmouthed in comparison to Portland and Vancouver. I see it about once every three months in the editorial page. In Portland,

residential development is subject to the same FAR as office is. In Seattle, it is essentially unconstrained. I just went up to Vancouver, and I didn't see blocky buildings like this in Bayshore. I saw small thin towers with a hundred feet in between them. So, if we think that's great, we're not heading that way. When I talked to the land use people in those two towns, both of their comments were, Seattle builds very bulky, dense, ugly buildings. Again it's not abstract, on the left is a view of the Cristalla that's being built right now, that's ¼ of a block. Next door the land is owned by one person, it's zoned the same way. You could get a building just like it. So the zoning now would encourage this kind of development in the current way. That's not exactly what we want in Belltown. I rode the ferry one day and with my camera took a picture of my area. I live in One Pacific Tower, there's Market Tower, Marketplace North, the Terminal Building, and I think you can see the Josephinum. If these were built, this is what it will look like in ten years. Now, we can wait that long, and then say, "we shouldn't have done that," or can we look ahead and see in our mind, what do we want to Seattle to be like and then lay out something. I don't necessarily advocate the wedding cake [approach to controlling bulk.] [TAPE ENDS] [Mr. Pehrson's comments concluded shortly thereafter. He supported bulk controls that would achieve view corridors and thinner building forms.]

Bob Klug

Dennis, John, Gordon, thank you. I am from Seattle City Light, and I just want to make a couple of comments. If you look on page 1-7 of the summary you'll see a very strong paragraph for a City document saying we absolutely need a substation in the Downtown area within the next ten years. Actually, it's less than that. And beyond that, we probably need three substations total in the north part of Seattle in that same time period, mindful that we haven't built one in the last twenty years. So this is a big undertaking. And it's a significant undertaking.

So here's the points I want to make tonight. One, we're probably going to see power densities in the Denny Triangle and South Lake Union that are greater than what exists in the CBD right now. The buildings that are being built use 2-3 times the power of a traditional office building and that's going to be a significant new development for Denny Triangle and the South Lake Union.

The other thing I want to point out is that on the substation, we are going to need a new substation location in the Denny Triangle area, and the question is, "how do you go about it?" And I want to throw your eyes north to Vancouver B.C. and have you look at a place

called Cathedral Square in downtown Vancouver where the substation is completely underground. And there is a city park on top of it. Now, City Light can't afford to build underground substations, so we're going to have to get some sort of cooperation from the community as a whole as how to go about funding this. And we can look to Vancouver as an example, and I'm not going to go into tonight how they went about it. But it was a partnership between the utility, the city and the development community. And it also fits the goals of the Downtown Plan as to how do you get more open space into a very compact area. Interestingly enough, they use the heat from the transformers to run the greenhouse on the site. So it is an ecologically sound design.

The other point I want to make here tonight is that we are strongly encouraging sustainable building design in every way possible. And I hope you work with our conservation staff and whomever else is available to see that that happens. And particularly now that we're looking at the possibility of an energy district in the Denny Triangle/South Lake Union area, as a way of reducing the heating and cooling loads on the new buildings that come into the area, as a way of leveling out the power demand. Because it's the peaks that create problems with the electrical system, it's when we have a very cold day or a very warm day that we need excess heating capacity or excess chilling capacity that it puts an exceptional strain on our system. So if we can level out those peaks we get a more reliable system that produces better power quality and helps everyone. So, when you go to design your new building for this area, think of building hydronic buildings that are heated and cooled by water that can be eventually connected to an energy district. Because this is the way of the future. Thank you.

Greg Smith

My name is Greg Smith. I reside at, offices at 810 Third Avenue, Suite 615. I have to say, I echo most of what I've heard before, so I'm not going to regurgitate it all. And I also echo what the gentleman said from Belltown, I think what Vancouver has done, has done taller buildings a little narrower to provide those view corridors that you're seeking in Belltown. I do think the one thing that's kind of an overall that we have to keep in mind, the one thing that Seattle doesn't have is more land and the one thing it is going to have is more people. And so we really need to take into consideration the concept of density in urban centers. This plan I think talks about, it works until 2020 after that it's not sure what's going to happen. That's 17 years from now. That's like the snap of a finger. We should be talking about creating a city that can handle growth for the next 50 years not the next 16 years. Therefore, I

think that all alternatives don't go far enough as far as creating density. So they should encourage higher heights, yet maintaining the view space, which we're seeing in other cities--Vancouver, San Diego. I did develop IDX Tower, I sold, I developed IDX Tower. I developed a permit for the site and sold it to the developer. I developed the Millennium Tower, which is the mixed-use building at Second and Columbia -- it's 20 stories. I do agree with the comments about providing more flexibility in design, because those buildings are dictated, the shapes of them are dictated by current code. And the architects' community, even the Design Review board will acknowledge that there is not enough opportunity to create interesting architecture that is what the public wants. I'd also like to include in this, the DOC 1 even though this deals a lot about DOC 1, DOC 1 as a zone is already developed, it's maxed, there's very few sites left in the DOC 1 core to develop. So though we're talking about an upzone of the Downtown office core, which is a good thing, it's already happened there. It's either going to happen north, or it's going to happen south of the city. I'd like to see this whole plan really look at from the University of Washington south down to South Downtown. I realize it doesn't. I see John smiling. So the one thing I do think it needs to focus on however is the Downtown Retail Core. This talks about zones that circle the Downtown Retail Core, which is also a zone that was created back in the Eighties. Property that we own there, for instance, is a property we'd like to create residential high rise, along the lines that have been discussed--higher, taller. Yet the zoning there is inadequate, it's outdated, it doesn't provide for us to create that residential density in that strategic area of the city. Now looking outside of this plan, this study area, I do think that we shouldn't just leave a donut hole in the middle, we should study the DRC zone as well, and really take under consideration what can happen there. I guess the last thing I think, about affordable housing, it's important to keep in mind that if we want affordable housing in this city, which we have to have, affordable housing is protected by increased density, because the less density you have in a land restricted area, the higher the prices of land are going to be and the less it becomes affordable. So we really need to keep that in mind when we're talking about land use policies. We should try to increase density, on a per-acre or per-square-foot basis as much as possible. That is the best friend to affordable housing. Thanks.

Irene Wall

I hadn't planned on making a comment, but since you've invited me I will. And I will be sending in some written comments as well. I can't help but thank you Kate for making that comment earlier in the

evening about wonderful cities that have great ambience for pedestrians. And you mentioned Paris. One thing about Paris is that there are no very, very tall buildings in the downtown of Paris and that does contribute to its wonderful ambience. I'm not suggesting that all tall buildings are bad things.

But the other kind of comment that I've heard all night is that somehow having very tall buildings in Downtown Seattle is going to save Snohomish County or eastern King County or Skagit. And until we really tighten up the connections between the willingness of the City of Seattle to accept more density, and there being big disincentives in other places to create sprawl, then I'm afraid that's a wonderful theory but we really haven't seen it borne out.

The other comment had to do with the requirement that the City has as a center city place to accept a great deal of density in the regional scheme of things. But we should also remember that we are not the only city center that is designated in the region's comprehensive plan. There are other cities too that are striving to see their sort of economic development agendas met. And we can kind of laugh and say Federal Way is not a real place and Lynnwood is not a real place yet. But, you know, they want to be real places. And as long as the city of Seattle desires to sort of be the "great sucking sound" for growth, they will be kind of shut out. So I think the development community has a bit of an obligation here to say "what is the greater regional requirement?" We do talk about the investments that we're making in transportation and it's true most of them still do lead to Downtown, but where are they coming from? They are coming from other potential regional centers where people already live. So I think we should bear that in mind before we try to accept the burden of all regional growth in Downtown Seattle. Thank you.

Downtown Height and Density
Comments on the Draft EIS at the Downtown Neighborhoods Forum
February 24th, 2004

TESTIMONY

Heather Trim - People for Puget Sound

We very much like the idea of increasing density in Downtown and going to the Vancouver B.C. model. But we'd like to (inaudible) [point out that] the amenities and the open space are reduced with all 3 alternatives. And, we are especially concerned about greenspace. If you're going to double the population of Downtown, then we need to double the amount of greenspace. The modeling, and I guess the previous zoning, are done on "per 1,000 households," where much of the standards used in the country are actually done on "per 1,000 residents." So we actually fall quite short, when using those kinds of standards.

And finally on stormwater, it's inadequate for us that you talk about "better stormwater controls will likely improve stormwater flow into the CSOs." We want to see better treatment and that would include infiltration, greenspace, porous pavement. So we would basically like to see that written into the document at this point, and more of a commitment to that at this point.

Lyn Krizanich - Denny Triangle, Clise Properties

Lyn Krizanich, co-chair of the Denny Triangle Neighborhood Planning process, and I work for Clise Properties. And I wanted to add that, having been engaged in this process for, well since 1996, the Denny Triangle Plan first of all it embraces increased density, and it has from the very beginning and how we did that, we crafted it very carefully. We want to be able to achieve our goals in both commercial, which means jobs, and employment as well as housing. We didn't want to achieve one of those at the expense of the other. So we would like to see the height and the FAR (the density) increased. What that does is that it gives you taller buildings and you use the land differently. It frees up the site so that what's remaining after you've taken your commercial development and put it in a taller building, which again allows for view and better building character and building tops. It leaves the rest of the property available for two things. Open space, which is critically important to livability for these neighborhoods with this density, and housing.

And specifically, the Neighborhood Plan was crafted to be compatible with the Downtown Urban Center Planning Plan of the other neighborhoods, to put the height and density primarily in the Denny Triangle and not in some of the other neighborhoods that didn't want the increased density and height. But specifically to make sure that we would get the affordable housing. And [we] have this gap that exists. There are some mechanisms for both the low-income housing and market rate housing - we welcome it all by the way - but we specifically crafted this so that it could be a win all the way across the board. And at the last hearing, there was an enormous amount of testimony for just that kind of scheme. And, as one of us who has been long at this, Catherine said [for] the stakeholders, "we're still here and we still want a Downtown that meets all of those needs."

John Rahaim: Thanks, Lyn. Yes, a question.

[Crowd member]: So which alternative do you propose?

Lyn: It has to be... None of these represent the DUCPG or the Denny Triangle Plan. The one that comes closest is [Alternative] Number 1, but it has some elements in there that frankly cause a little confusion, in putting some of the height in Belltown where it wasn't desired. But we think that actually we can do better. With the passage of time, I think we need to be bold. We need to look at what more we can do to get the jobs and housing that we want. So I'd say it's Alternative 1 with some changes and some extra height and density.

Pete Mills - Historic Seattle

Hi, my name is Pete Mills and I'm a council member with Historic Seattle. I speak primarily for myself, but Historic Seattle does support the increased density in the area. One thing I'd like [us] to consider in the Draft [EIS] is something that Gordon Price mentioned. I saw on the website that his presentation, it was really eloquent, it really made me very interested in potentially living Downtown. One of the things he mentioned was, as an ingredient to the success of your Downtown, would be diversity...diversity of tenure, diversity of buildings, diversity in use, diversity in several different areas. But diversity in tenure gives you a fabric of a community that is more livable. And that is really what I'd like to see in the Downtown and also included in the EIS. And Historic Seattle is submitting a letter with more specifics in it.

Nancy Bagley - League of Women Voters

Hi, I'm Nancy Bagley, and I'm representing the League of Women Voters of Seattle tonight. The League has studied and acted on Downtown land use issues for over 20 years. We were actively involved in the development of the Downtown Plan in 1985 and the 1994 Comprehensive Plan. We continue to follow the City's land use planning and regulations with an eye toward preserving and enhancing our vision of a most livable city. So, a few comments on the Draft EIS.

First, the proposed changes and their relationship to the Growth Management Act and the City of Seattle's Comprehensive Plan. We acknowledge and endorse the city and state goals of directing growth to urban areas, reducing sprawl and accommodating increased density of commercial and residential buildings in the study area of Downtown Seattle. We learned from the Draft EIS that current zoning, Alternative 4, is adequate to accommodate the employment and residential growth projected through the year 2014 under the Comprehensive Plan adopted in 1994. We question whether substantial changes in zoning, such as the substantial height and density changes proposed in Alternatives 1, 2 and 3, should be undertaken before the Comprehensive Plan is thoroughly reviewed and updated to address the following twenty years, from 2014 through 2034.

Major changes are underway, as we've already heard from Ms. Sugimura, in areas close to the study area, such as the Waterfront, port properties in North Bay, the SODO area, South Lake Union, and the east Pike/Pine and Madison areas. A broader look at the entire Downtown and the nearby areas cited should be undertaken as part of the required once-a-decade review of the city Comprehensive Plan. These other areas could provide opportunities for residential growth, including affordable housing. Their residents could work Downtown, provided public transit is available.

Major transportation projects, such as the Viaduct, the Waterfront plan, the monorail, the bus tunnel closure for light rail should be reviewed for their impacts on the study area, and all of Downtown before substantial changes are made in Downtown zoning.

Many of the changes in zoning height limits and bonuses recommended by the Downtown neighborhood plans have already been addressed by the City Council and were adopted in 1999 and in 2001. It may be premature to change the rules substantially again, before we know how the recent changes are working. We question the elimination of the Transfer of Development Credits program in some of the

Alternatives. This program has the potential to encourage residential development and provide funds for amenities in the Denny Triangle.

The following are areas that we think need more thorough analysis of impacts and possible mitigation strategies in the Final EIS. First, housing. The League supports the goal of increasing the amount of housing in the study area. But we look at Table 25 in the Draft EIS which projects the number of potential residential units under each alternative and we see that the totals for all four alternatives are quite similar, ranging from over 7,300 under Alternative 4 No Action, to over 7,600 units under Alternative 2. We question the tradeoff of a few more residential units for the substantial increases in height and density proposed in Alternatives 1, 2 and 3. We urge that the Final EIS include a more thorough review of the possible mitigation strategies listed in [Draft EIS] Chapter 3, page 3-28. Because we do recognize that the challenge of finding funding for low-income and affordable housing in the study area will be great under all four of the alternatives. Current incentives fall short of meeting the real financial costs of creating low-income and affordable housing in the Downtown. More attention should be given to meeting the housing and service needs of families with children that do or might live in Downtown.

The rezone proposed in Alternative 3 to DMR/C for a residential mixed-use area with reductions in FAR looks promising and should be reviewed more intensively in the Final EIS. We support a clustering of residential uses in order to provide more of a feeling of living in a neighborhood. In addition we propose that the Final EIS include a review of a new provision for limiting the density of residential buildings in the study area.

Under Height, Bulk and Scale, the Comprehensive Plan goals and policies for Downtown place a special emphasis on the quality of the pedestrian environment. The increases in height and bulk proposed in Alternatives 1 and 2, and in Alternative 3 for the commercial core, would negatively affect the pedestrian experience with taller and bulky buildings towering over the narrow streets and sidewalks in the study area. The Final EIS should more thoroughly review these negative impacts.

Do the tradeoffs of increased space for jobs and housing outweigh the negative impacts on the pedestrian experience, on aesthetics and ultimately on the livability of the city? The League supports zoning and policies included in the 1985 Downtown Plan that require a smooth transition in scale and density of development from the areas of greatest height and density to areas of lowest height and density.

Alternative 1 includes unacceptably abrupt increases in height, bulk and scale along the edges of sensitive transition areas.

And finally, open space and parks. This Draft EIS exposes the current and future inadequacies in the amount of open space and parks available to residents and employees in the study area under all four alternatives. The Final EIS should explore the other possible mitigation strategies outlined in [Draft EIS] Chapter 3, page 3-125. Since the likelihood of adding major open space to the study area in the foreseeable future seems remote, attention should be given to improving the pedestrian connections between Downtown and major nearby open spaces, such as the Waterfront, the Seattle Center and South Lake Union. Increasing height and density without significantly addressing the already inadequate amount of open space in the study area is unacceptable. Thank you for this opportunity to present our comments from the League of Women Voters.

William Justen

I'm William Justen, I've worked Downtown for 35 years and lived Downtown for 27 years. I walk to work, don't use a car, and I also represent Samis Land Company, it's a major property owner in Pioneer Square and the Commercial Core. I think Alternative 1 gets close but doesn't get far enough. We really need to take advantage, and contrary to the previous speaker, I don't think we should wait, that we've already lost much opportunity as we've developed or are developing the last parcels of land Downtown, this is the time we ought to take maximum advantage of that, to increase the density to accomplish the goals of a livable Downtown.

I think we need to increase the FAR and height in Alternative 1 with special attention to slender towers getting a bonus, probably 20% additional height for residential buildings over Alternative 1 that can be tall slender structures. So, I think Alternative 1 is close but not far enough.

As far as the Draft EIS goes, the concern I have is that it does not recognize Downtown residential use as a mitigating measure to traffic and parking, and I believe as a resident Downtown, and many of my friends that are, we really do consider living Downtown a form of mitigation. I walk to work, sometimes if I have to go further I'll take the free bus ride Downtown. I don't need two parking places, and the Draft EIS really anticipates a parking place for every new residence and a parking place for every new job. You don't need to double up. About 1/3 of the job growth in the Draft EIS, about 70,000 jobs, about 30% or so of that will really be coming from the new

residential growth Downtown. I don't think that was anticipated. So, the EIS really needs to look at this mitigating aspect on parking and transportation-traffic-for this Downtown population that is also coming as part of the growth. The growth is going to happen, this is where it should happen, and I'm very excited about the opportunity to make this city tall, slender, high-density and livable.

Tony Puma

I'm Tony Puma. I'm just clarifying a thought. The last two speakers talked about open space. There's a presumption that the increased density creates demand by that very density. The roof of this building and the roof of the building across the street are green. And this suggests that if you do have some sort of wedding cake kind of formula [for building setbacks], where there is a certain portion of the site that is horizontal at a higher level, and that that becomes a green space, that you're offsetting some of the demand that would occur at the ground floor, where it is most expensive to do (and in large measure falls to the public [sector] to do, as opposed to the private sector to do). So, in particular you might want to think about some sort of a formula that ties this sort of narrow slender tower that William described, with the provision for development of the other flat portion of the site, at whatever level, in order to capture that opportunity. And particularly when they're planning it. I find it ironic that you can't get on this roof. [applause]

Tory Laughlin Taylor

I'm Tory Laughlin Taylor, affordable housing developer, and also serve on the Seattle Design Commission. I think several of the comments, and a concern of mine in this whole process in reviewing this Draft EIS is, it's really challenging to extricate pieces of (inaudible) [an effective strategy]. The fine tuning you need to get to is, there's an issue of height and bulk - sorry, excuse me, there's a "height versus bulk" issue really. I think there has been a general acknowledgement - and somebody mentioned what Gordon Price talked about - that a mitigating factor is getting taller but skinnier towers.

And I think that however we come out of this EIS process, we need to start getting that layer of detail in there, so that we start talking about the pronouncing of [different options, such as] you can get the additional height, maybe not in combination with additional bulk and width. That dovetails with the question of residential development versus and in combination with commercial development.

Because at least in this market you're really talking about two different footprints. And the commercial is going to tend to be a bulkier footprint in current demands versus residential. So I just look to getting that into our next level of analysis.

And then the other issue which I'll just touch on briefly is the issue of infrastructure needing to be enhanced. And I think there are ways that the city, and if already [doing so], to continue to coordinate the development of infrastructure, so that we're not talking about a development-by-development [approach which results in] the sometimes ludicrously expensive development of infrastructure.

John Pehrson

I'm John Pehrson with the Belltown Housing and Land Use Committee, a part of our community council. And we've taken a position on this relative to south Belltown, which is a part of the area covered. The DMC zone in that area puts essentially no constraints on bulk for residential development. And if you have, say, a 15,000 square foot lot, you have no constraints. You can build it from lot line to lot line up to the max height. This kind of development is visible in our area at 7th and Virginia at the Metropolitan Tower, and they're currently building the unit at 2nd and Lenora. So, we believe strongly that that should be changed. The emphasis on residential has gotten too far.

Other areas - we need some space between those towers, and other cities like Vancouver and Portland have restrictions on the distance between those towers. So, that's why we took a position for a change similar to Alternative 3. We would welcome less prescriptive things than the wedding cake approach now prescribed, but certainly something that limits the bulk in these areas.

John Fox

My name is John Fox. I'm the coordinator of the Seattle Displacement Coalition. We will be providing some written comments in a lot more detail before the 29th. Our organization participated in the process of developing the Downtown Plan twenty years ago. And I can't help but compare the process that we're going through now to the process the City went through twenty years ago.

That process at the time included a limited growth option, not just the status quo and then options that would add either varying amounts of office or residential. And there was a limited growth option which the City ultimately did not implement, which subsequently

led to the CAP Initiative that led to a lot of the limitations or provisions that we have that remain in the Code today. There should be, we believe, a limited growth option that assesses costs and benefits of actually reducing densities in Downtown and particularly the office core densities in the central core.

We're also struck by an absence of an assessment, a thorough assessment outside the core in the neighborhoods that ring the Downtown core, particularly with reference to transportation impacts, but also impacts on affordability. To the extent that the additional densities that are added Downtown (office densities) generate demand. And with only a portion of those folks living Downtown we believe, as was done 20 years ago, there needs to be a more thorough assessment of impacts on all our neighborhoods, both with respect to transportation and affordability, accompanying each of these alternatives.

Also there was in the process 20 years ago, the City hired Gruen and Gruen, to do a thorough cost/benefit analysis of the options, both again from the standpoint of added infrastructure and looking at both tax revenues that were generated for the City and then the budgetary costs that would be accompanying those options. It was a thorough assessment and we'd like to see a similar kind of assessment accompanying these options, to get a clearer understanding of what really the costs are, particularly the fiscal costs for the City of Seattle.

We also want to echo the concerns that the League has articulated. We had the opportunity of working with them on that plan 20 years ago, and some of the concerns about "why now?" when again, there are all these other things going on. We did very recently adjust the programs, the bonus programs, TDR and so on. Again, some concerns we have about acting now rather than sort of letting these other processes play out a bit.

The last issue is housing mitigation, and the document is wholly inadequate right now in terms of - I was pleased to see that the document did, and for the first time, acknowledge that the City has lost a substantial amount of low-income housing in Downtown. Twenty years ago the City as part of the Downtown Plan made a commitment to preserve 7,300 units of low-income housing priced at or below 50% of the median. They at that time also, there was also a multifamily housing task force, or it was a Downtown housing task force, to review the yearly numbers showing loss and increases across the range of housing units and then recommending changes or adjustments in the plan on a yearly basis. There was a demolition control ordinance that was part of that plan, an anti-abandonment law, a range of solutions that

are obviously not within the realm, or are not included here in the Draft. And there is a lot more - at least we have an acknowledgement - I think they identify 5,800 units, so we've fallen some 1,500 units short of the commitment we made 20 years ago to preserve what's left of the lower priced units. Obviously, one thing we would want is to be more aggressive in subsequent plans of addressing that failing. And unfortunately this document is even less adequate because we now are without some mechanisms we had following that plan, and now we are going ahead and adding density. So I again underscore the need to have much more aggressive regulatory approaches within the framework of what is legally acceptable, to ensure that we don't continue to lose housing in the face of these added densities you're prescribing.

Jim Ferris

Jim Ferris with Housing Resources Group. We're a non-profit affordable housing developer and manager. We've preserved or created approximately 1,600 units, about 25 different apartment projects around the Downtown area, and Capitol Hill and 1st Hill. What John was just describing about preservation and the amount of need for more incentives, the Housing Resources Group sees that the program as it originally existed did a lot to preserve historic buildings in neighborhoods like Downtown and Belltown in particular. And it was very successful in maintaining or trying to preserve the existing housing stock. Where we are 20+ years later is that Downtown has changed by virtue of the existing zoning to the point where it is very difficult to create new housing and down to the affordable housing stock because the land prices Downtown are extremely difficult and a challenge for non-profits to provide affordable housing in this environment.

Housing Resources Group is very encouraged about seeing something even more aggressive than Alternative 1 actually being looked at as mitigation to create affordable housing. Right now in the Downtown neighborhood, the housing levy is available to be used for housing for people earning below 50% of the median income. The Downtown growth targets for the people earning 50-80% of the median - and I'll be the first to say, 50% and below median income, we are not meeting those targets - where we have an even much bigger problem to solve is income loans for the 50-80% median.

And the Downtown TDR bonus program is the only tool available for affordable housing to be created. And so, HRG has been able to use the housing bonus program twice. Once at 8th and Stewart, Stewart Court, working in collaboration with Clise Properties, to develop housing next to their new office building. And we just finished the

renovation and construction at 3rd and Pine, the Gilmore project, which also has used the housing bonus program.

Our ability to do more affordable housing Downtown serving the workforce and earning 50-80% of median is not going to happen. We've created some changes to the zoning to create an additional cost to commercial developers of \$22 per square foot to help pay to mitigate for affordable housing. But there has been no change in zoning to allow commercial developers to build buildings to create those incentives, so we have an imbalance in the program right now, in our opinion. And until we see additional density in commercial development you will see no more affordable housing Downtown. So we encourage Alternative 1 and we encourage you to pass it through the Council this year, because we're losing the window of opportunity for more affordable housing to get built in the next real estate cycle. Thank you.

Jack McCullough

I'm Jack McCullough. I run a small business Downtown. Just three quick points. One is, the process we're in, just to underscore what Catherine said earlier, the process we're in is the culmination of something that started in 1994. This is one of the -- this is really the last neighborhood plan that hasn't been finished in the City of Seattle. And so the reason we're doing it now is that we're finishing what we started when growth management started here in the city.

The second point was just to pick up on the one Jim just mentioned, which was the idea of market opportunity. Now, there was a code that the League mentioned adopted in 1985. And unfortunately, the development that occurred in the latter part of that decade was not affected by the code because the code was adopted too late and missed the opportunity to really maximally impact that. We saw code amendments Downtown in 1999 and 2001 but again we missed the opportunity to affect the round of development that occurred. Because these rounds of development only occur once about every 6 or 7 or 8 years, we missed the opportunity to affect that [last round].

We're sitting here in a point in history where we have the opportunity to affect a round of development that is going to start to occur in three years. And I think if we don't take this opportunity, then what we are doing is we are foregoing the chance to impact what the Downtown looks like in a favorable way probably for at least another decade.

And the final point I have is just to encourage John and the good folks in the Planning Department to do what the city has done best, really, in the code is to focus on incentives. You hear a lot about regulation, but the only regulation that is sure to work and the easiest one is to say "no" to something. The challenge is to try to forge a set of incentives - only, market-based incentives - in your regulations [that] will attract the kind of development that you want to see, not hold it off. So, hopefully in this next cycle we can do that, and we think we've got a good team to do it. Thanks John.

Gabriel Scheer

My name is Gabriel and I'm just here as a citizen and a resident. So I'm not representing anybody in particular. I just wanted to make my thoughts known on the proposals. I think Proposal [Alternative] 1 is heading in the right direction. I think that Vancouver and Portland set some really good examples. Downtown Vancouver with their soaring buildings, I think would be a wonderful thing to see in Seattle. I think we need to increase our density, because if we don't were going to end up like L.A. and sprawl all over the place and I don't want to see that.

And second to that, in terms of incentives and speaking to the comments we just heard. I think that incentives can be a wonderful thing if they're planned carefully. And I think in keeping with that, I'd like to see some of the incentives used to develop Downtown Seattle much further to try to be pedestrian friendly as she was talking about - the representative of the League of Women Voters - and trying to be environmentally friendly. Giving different FAR rules if you're using development of more green spaces either on green roofs or just down on the streetscapes themselves. Or stormwater mitigation, a variety of things can be used. And I think that incentives are a great tool, but they have to be used carefully. So those are my thoughts. I think we do need to increase the density, but let's do it well.

Dan Abramson

Hi, my name is Dan. I respectfully disagree with the League of Women Voters as far as it being time to wait. I think I understand those needs. But the fact that there is the Viaduct, Sound Transit, WSDOT, South Lake [Union] with Paul Allen and all that is exactly why Seattle needs to really look at their zoning. The zoning has been dating. And unfortunately, whether we like it or not, growth is happening. This is a great area, people are coming here, and managing it is a much better option than denying it.

The only thing that I'd ask on the EIS is that there is some consideration for the low-income and entry-level housing which is terribly sparse in this area. I think it provides a nice input to the community, with the first view. And so to mitigate the balance between commercial and residential, having some offset from commercial incentives to low-income housing in some designated areas or cluster homing would be a benefit to everyone.

Responses to Comments in Public Hearings

December 15th, 2003 Meeting

Richard Stevenson

1. Your comments endorsing greater density than studied under Alternative 1 are noted.
2. Your comments on the differing economic considerations of developing Downtown versus other areas are noted.
3. Your comments opposing the existing upper level setback requirements and endorsing design flexibility are noted.
4. Your comments opposing downzones and endorsing incentive-based approaches are noted.

Lyn Krizanich

1. Your comments supporting the commercial and residential objectives of the Denny Triangle Neighborhood Plan, and criticizing delays in decisionmaking on this zoning proposal, are noted.
2. Your comments endorsing greater height and density than studied under Alternative 1 are noted. The recommendations in the Draft EIS for Alternative 1 are taken directly from the Denny Triangle Neighborhood Plan, to the extent that the plan provided specific information. Height increases of 100 feet were recommended throughout the area, and base and maximum FAR increases to 7 and 14 respectively were proposed. While specific FAR limits were not identified for the DMC zone, the plan indicated that the increases should be similar in relative magnitude to those for DOC 2, so the base FAR was increased to 7 and the maximum FAR increased to 10. This assumption is consistent with recommendations made by the Advisory Committee reviewing changes to the bonus and TDR programs that were to be considered in conjunction with recommended height and density increases.
3. Your comments opposing the existing upper level setback requirements and endorsing design flexibility are noted.

Catherine Stanford

1. Your comments on the coordinated nature of the Downtown neighborhood plans, and the endorsement of housing objectives in those plans, are noted.
2. Please see the response to comment 2 by Lyn Krizanich, above, in this transcript discussion. Your comments disagreeing with the level of height increase in Alternative 1 for First Avenue are noted. Please see the response to comment 4 of your remarks, below.

3. Your comments on the need for additional regulatory changes to implement the neighborhood plans, the disincentives inherent in the current regulations, and encouragement to move forward with decisionmaking, are noted.
4. Pages 2-8 through 2-12 in Chapter 2 of the Draft EIS described how the Commercial Core Neighborhood Plan endorsed "super bonus" proposal changes with interim height and density increases that would have applied to the DMC 240' zone along First Avenue. Further, it illustrates how the later Bonus/TDR Advisory Committee requested consideration of height and density increases in the DMC zones similar to those considered for other DMC zones. The comparable DMC zones in the Denny Triangle Neighborhood Plan were requested to be increased by 100 feet with no specific level of density increase requested. The formulation of Alternative 1 was, therefore, set according to the directions indicated by the neighborhood plans and subsequent advisory committees.

Kate Joncas

1. Your comments on the scope of the alternatives and other trends affecting the need to support Downtown development are noted. This EIS reflects up-to-date consideration of the status and needs of Downtown. The recommendations in the Draft EIS for Alternative 1 are taken directly from the Denny Triangle Neighborhood Plan, to the extent that the plan provided specific information. Height increases of 100 feet were recommended throughout the area, and base and maximum FAR increases to 7 and 14 respectively were proposed. While specific FAR limits were not identified for the DMC zone, the plan indicated that the increases should be similar in relative magnitude to those for DOC 2, so the base FAR was increased to 7 and the maximum FAR increased to 10. This assumption is consistent with recommendations made by the Advisory Committee reviewing changes to the bonus and TDR programs that were to be considered in conjunction with recommended height and density increases. While the plan does call for increasing potential for commercial development, it also specifies objectives to "encourage a mix of low, moderate and market rate affordable housing throughout the neighborhood with project specific mixes of commercial and residential development," and to "encourage a "residential enclave" of predominantly residential development along key green streets ..."
2. The Draft EIS did not "equate density with a poor pedestrian environment." Further, the mere presence of additional bulk in buildings does not automatically "equate with a much higher quality pedestrian environment." In fact, the arrangement of building bulk next to sidewalks can greatly influence perceptions of comfort and pedestrian quality. Buildings that rise in sheer faces without setbacks or ground-level architectural treatments tend to create environments perceived as threatening or inhospitable, along with environmental effects such as excessive shading and downdraft winds directed onto pedestrians. However, if buildings are well-designed with good aesthetic treatments and well-designed arrangements of bulk, the impacts on the street-level environment may be effectively resolved.

The Draft EIS strove to provide a balanced evaluation of impacts on streetscape and pedestrian amenity (see pages 3-112 to 3-114 and 3-119 to 3-121). This included listing several positive impacts that would occur with future development, such as widening of

sidewalks, additional Green Street and street tree improvements, and development of continuous street-level uses. Similarly, adverse impacts were carefully described to provide a balanced and accurate depiction of the impacts. Descriptions of differences in building bulk and arrangement among alternatives aid the reader in visualizing the conditions at or near street level, including solar access and relative openness of the physical setting.

3. A review of the Draft EIS text reveals that it does not use “worst-case” terminology (or similar wording) in a biased manner with regard to any alternative. The Draft EIS was carefully worded to maintain reasonable, objective comparisons among the alternatives, because none of the alternatives was treated as a preferred alternative.
4. Your comments favoring a continued strong emphasis on addressing affordable housing needs, and recommending a look at the content of the alternatives, are noted.
5. Your comments favoring proactive planning are noted.

Jim Ferris

1. Your comments on the need and opportunity to do more for affordable housing development through code changes are noted.
2. Your comments endorsing larger changes than Alternative 1 and expeditious decisionmaking are noted.

Joe Quintana

1. Your comments endorsing additional height and density on the basis of growth management principles are noted. The Draft EIS did include discussion that evaluated the alternatives' relationship to plans and policies, including those related to bigger-picture growth management concerns.
2. Chapters 1 and 2 of the Draft EIS discussed the context and reasons why the alternatives are being studied, as well as relationship to neighborhood planning.
3. Please see Chapter 3 of this Final EIS for additional discussion of this topic.
4. The Housing impacts discussion on Draft EIS pages 3-17 to 3-27 includes Table 16 that compares the housing capacity of the alternatives with and without the effects of TDC capacity. These quantitative findings primarily illustrate how maximum residential buildout capacities in the studied Downtown zones would be affected by the alternatives' zoning. This type of calculation does not depend upon whether the TDC-related capacity is used for housing in the next 20 years or not. Further, the analysis of 20 years of residential growth does not require that any of the TDC-related capacity is used. So, the analysis is neither liberal nor in error when it provides that calculation of residential capacity.
5. Your comments on the need for design flexibility and in favor of Design Review are noted.

6. Your comments objecting to encouragement of “mandatory” mixed-use development are noted. The provision proposed in Alternative 3 makes mixed-use “mandatory” only in the sense that projects opting to develop above the base FAR would be required to include residential use on the site. Commercial development in the DMR/C zone under Alternative 3 would be permitted to build up to the base FAR of 5 without housing.

Adrienne Quinn

1. Your comments registering disappointment with the findings of impacts in Belltown, in light of coordinated planning of the neighborhood plans, are noted.
2. Please see Chapter 3 of this Final EIS for additional discussion of this topic.
3. The Streetcar concept is the only potential transit investment that was not explicitly considered in the Draft EIS transportation analysis. The presence of the Sound Transit and monorail systems were assumed in the study's mode split assumptions. While the Streetcar project is potentially beneficial for transit accessibility to/from South Lake Union, its presence is not likely to alter the findings of the EIS transportation analysis. Therefore, the validity of the adverse transportation impacts identified in the Draft EIS is not challenged by this comment, and no supplemental analysis is necessary.
4. Your comments noting lack of housing development as a result of regulatory shortcomings are noted.
5. Your comments noting lack of support for the TDC program are noted. The TDC program was structured to accrue benefits to the Denny Triangle in the form of streetscape improvements and additional housing development.
6. The recommendations in the Draft EIS for Alternative 1 are taken directly from the Denny Triangle Neighborhood Plan, to the extent that the plan provided specific information. Height increases of 100 feet were recommended throughout the area, and base and maximum FAR increases to 7 and 14 respectively were proposed. While specific FAR limits were not identified for the DMC zone, the plan indicated that the increases should be similar in relative magnitude to those for DOC 2, so the base FAR was increased to 7 and the maximum FAR increased to 10. This assumption is consistent with recommendations made by the Advisory Committee reviewing changes to the bonus and TDR programs that were to be considered in conjunction with recommended height and density increases. While the plan does call for increasing potential for commercial development, it also specifies objectives to “encourage a mix of low, moderate and market rate affordable housing throughout the neighborhood with project specific mixes of commercial and residential development,” and to “encourage a “residential enclave” of predominantly residential development along key green streets ...”. Please see Chapter 2 of the Draft EIS for additional description of the relationship of the alternatives to the neighborhood plan.

Jack McCullough

1. Your comments describing past changes in Downtown regulations and factors supporting additional density in Downtown are noted.
2. Your comments opposing Alternative 3 are noted. Please see the responses to comments in your letters (#20 and #21) in Chapter 5 of this Final EIS for further discussion.
3. Your comments on development cycles, long-term density needs, and the need for timely action are noted.

John Pehrson

1. Your comments about concerns with excessive building bulk and the need for effective bulk controls are noted.

Bob Klug, City Light

1. Your comments about the future need for additional substations are noted.
2. The Draft EIS indicated that expected power densities for many new developments would be greater than past traditional Downtown buildings.
3. The City recognizes that further City Light system planning and capacity analysis will likely alter the scenarios and types of improvements suggested in Mr. Klug's testimony.
4. Your comment reinforces the need for sustainable building design.

Greg Smith

1. Your comments endorsing additional density Downtown and a long-term perspective on growth needs are noted.
2. Your comments endorsing greater height and density to accommodate building design flexibility are noted.
3. Your comments that the DOC 1 zone is already fully developed, and the need for additional planning for areas north and south of Downtown, are noted. Additional Center City planning will continue to evaluate next steps for long-term growth needs.
4. Your comments on the Downtown Retail Core (DRC) zone are noted. Amendments to height provisions in the DRC zone adopted in 2001 did provide additional flexibility for increasing the base height of 85 feet to the maximum height of 150 feet in the zone, while also allowing a further 30% increase in height for residential and mixed-use projects along the western edge of the zone. Additional inclusion of rezones in DRC at this time is not anticipated within this EIS.

5. Your comments favoring density for the sake of accommodating affordable housing are noted.

Irene Wall

1. Your comments on the relationship of pedestrian qualities and building bulk are noted.
2. Your comments on challenges in achieving better regional growth management are noted.
3. Your comments endorsing a bigger-picture perspective on where and how much growth should occur and consideration of regional growth management purposes are noted.

February 24th, 2004 Meeting

Heather Trim – People for Puget Sound

1. Please see the responses to Comments 1 and 2 in your letter (#11) in Chapter 5 of this Final EIS.
2. Please see the responses to Comments 1 and 2 in your letter (#11) in Chapter 5 of this Final EIS.
3. Please see the response to Comment 3 in your letter (#11) in Chapter 5 of this Final EIS.

Lyn Krizanich

1. Your comments on the intentions of the Denny Triangle Neighborhood Plan, including its support of residential development, commercial development and open space, are noted.
2. Your comments encouraging adjustment of Alternative 1 with additional height and density, and changes to the Belltown elements of Alternative 1, are noted. Please see Chapter 1 of this Final EIS for discussion of the Preferred Alternative.

Pete Mills

1. Your comments describing the benefits of diversity, including diversity in housing, uses and building types, are noted.

Nancy Bagley – League of Women Voters

1. Please see the responses to Comment 1 and other comments in your letter (#10) in Chapter 5 of this Final EIS.

2. Please see the responses to Comment 1 and other comments in your letter (#10) in Chapter 5 of this Final EIS.
3. Please see the responses to Comment 1 and other comments in your letter (#10) in Chapter 5 of this Final EIS.
4. Please see the responses to Comment 2 and other comments in your letter (#10) in Chapter 5 of this Final EIS.
5. Please see the responses to Comments 3, 4 and other comments in your letter (#10) in Chapter 5 of this Final EIS.
6. Please see the responses to Comment 5 and other comments in your letter (#10) in Chapter 5 of this Final EIS.
7. Please see the responses to Comment 6 and other comments in your letter (#10) in Chapter 5 of this Final EIS.
8. Please see the responses to Comments 6, 7 and other comments in your letter (#10) in Chapter 5 of this Final EIS.
9. Please see the responses to Comment 8 and other comments in your letter (#10) in Chapter 5 of this Final EIS.

William Justen

1. Your comments, encouraging additional height and density above Alternative 1, with special attention to bonuses for slender towers, are noted. Please see Chapter 1 of this Final EIS for discussion of the Preferred Alternative.
2. Please see the responses to Comments 2 and 3 in your letter (#18) in Chapter 5 of this Final EIS. The EIS analysis did not assume two parking places for Downtown residents that are also Downtown employees. Instead, it accurately accounted for reduced residential parking demand from Downtown residents as well as levels of employment-based parking demand.

Tony Puma

1. It is acknowledged that different arrangements of bulk on a site may create opportunities for open space features on above-ground rooftop or plaza spaces. This could potentially be included in the codes as a bonusable feature. Please see Chapters 1, 3 and 4 for further discussion of the Preferred Alternative.

Tory Laughlin Taylor

1. Your comments about the need to start identifying more detailed options for height and bulk controls are noted. This Final EIS provides additional information that seeks to illuminate the

choices and tradeoffs that are inherent in making Downtown zoning changes. Regarding commercial and residential development, in some cases it may be possible to develop these two types of uses in separate towers within the same development.

2. Your comments in favor of coordinated development of infrastructure are noted. The Draft EIS identifies a number of strategies that could be employed to improve the transportation and street system to handle projected congestion, as well as with regard to electrical infrastructure.

John Pehrson

1. Your comments about concerns with residential building bulk and the need for creative, effective bulk controls are noted. Please see Chapter 1 of this Final EIS for discussion of the Preferred Alternative.

John Fox – Seattle Displacement Coalition

1. Your interest in including a limited growth option is noted. The EIS provides required environmental review for a set of rezone proposals based on already-adopted neighborhood plans. The purpose and parameters of the environmental review process are quite different from broader Downtown planning efforts that occurred for the 1985 Downtown Plan. The EIS includes the required analysis of a "No Action" Alternative addressing what would happen if no zone changes occurred. SEPA does not require other inclusion of limited growth options.
2. Additional analysis of the alternatives' transportation impacts in an extended area surrounding Downtown would be overly speculative and is beyond the scope of this EIS.

Regarding housing affordability, it is beyond the scope of this EIS to speculate on affordability trends in Seattle neighborhoods as a result of growth. Further, the projection and study of future growth is not in itself an impact of the alternatives. The EIS was oriented to identifying the differences in impacts that would arise with the same amount of growth in Downtown areas under different zoning requirements. The potential impacts of future growth have already been analyzed in documents such as the environmental review for the City's 1994 Comprehensive Plan which introduced the Urban Village strategy.

3. SEPA does not require a cost/benefit analysis of the alternatives as suggested in this comment. Such an analysis would be beyond the scope of this EIS. The analysis does indicate financial implications in some of its findings, such as differences in projected funds generated for housing under the alternatives.
4. Your concerns regarding the need to make changes in Downtown zoning are noted.
5. Your concerns regarding protection of housing resources are noted. It is the intention of City policy to maintain and enhance housing resources particularly for below-median income households. Numerous programs and policies are in place to encourage those objectives. The

Draft EIS included numerous possible mitigation strategies that could be employed to provide greater housing protections. The Preferred Alternative described in Chapter 1 of this Final EIS also includes mitigation strategies related to housing. Decisionmakers will consider the implications of the alternatives on housing resources.

Jim Ferris

1. Your concerns regarding the ability to develop affordable housing in Downtown are noted.
2. Your concerns regarding the need for changes in zoning to spur additional development of residential and commercial buildings are noted.

Jack McCullough

1. Your comments on the timing of this process are noted.
2. Your comments encouraging the use of market-based incentives in development regulations are noted.

Gabriel Scheer

1. Your comments favoring greater density and Vancouver-style building forms are noted.
2. Your comments endorsing careful use of incentives, pedestrian-friendly streetscapes and environmentally-friendly development strategies are noted.

Dan Abramson

1. Your comments on the need to proceed with zoning reform to address growth and change are noted.
2. Your concerns that low-income and other affordable housing opportunities should be more available, and that housing-oriented regulatory provisions should be included in some areas are noted.

Appendix B

Discussion of Transportation Demand Strategies

DISCUSSION OF TRANSPORTATION DEMAND MANAGEMENT STRATEGIES

Transportation demand management (TDM) strategies enhance transportation system capacity to move people and goods. TDM strategies should expand the choices available to downtown workers and residents and they should provide encouragement and incentives to use transportation modes other than single occupant vehicles. Effective management of parking supply will enhance the effectiveness of TDM programs by sending price signals that encourage transit use, bicycling and walking.

Expand Choice

Strategies that expand trip choice make alternatives to automobile trips easier to use (such as increased transit service, and physical infrastructure changes) and remove barriers to use of transit, carpools, bicycles and walking (such as providing means for mid-day trips and emergency rides home).

Improve Transit Service

More people will opt to use transit if the service is frequent, reasonably fast, and reliable; easy to use; and information is easy to access and understand. Establishing and meeting standards to achieve these aims will make transit a more obvious choice for more trips. Transit priority treatments, clear route designations, and real time information at transit stops, make transit a better choice.

Bicycle Improvements

In addition to providing bike lanes, routes, bicycle wayfinding, and paths, improvements to support bicycling include amenities at trip destinations such as secure bicycle parking for commuters, shower and locker facilities, short-term bicycle parking for non-work trips, and access to space for minor repairs. Establishing a connected network of bicycle through downtown and adjacent neighborhoods will encourage greater use of bicycles.

Car Sharing

Car sharing organizations such as Flexcar, provide access to automobiles on an hourly basis. Car sharing eliminates the need to drive (or maintain) a private vehicle for occasional short trips. It also provides a cost-effective alternative to maintaining fleet vehicles for many businesses. Carsharing can be especially attractive in neighborhoods with diverse land uses, serving business and employees during the day, and residents during evenings and weekends.

Guaranteed Ride Home

Programs that provide a ride home in the event of illness, emergency, or unexpected need to work late, encourage ridesharing and transit use by eliminating concerns about unexpected or emergency transportation needs.

Walking

Maintaining and improving the pedestrian-friendly environments encourages people to choose walking for many trips. Residential and retail development will be essential to establishing walking as a major travel mode.

Ridematching

Ridematching services help people establish and expand carpools and vanpools using secure computer databases that match commuters with others who work and live in the same areas.

Alternative Work Schedules

Encouraging employees to adopt compressed work schedules reduces the burden on the transportation system by shifting trips to the off-peak hours and eliminating up to 20% of an employee's commute trips.

Telecommuting

Allowing employees to work from home or another location (such as a neighborhood telework office) reduces commute travel. Telecommuting can be a valuable TDM tool even if performed on a part-time or temporary basis.

Encourage Mode Shift

In addition to providing the means to make different choices and removing barriers to choice, TDM programs must also make people aware of the options that are available.

Bicycling Encouragement

Programs to encourage bicycling typically include information on commuting equipment, route selection and bicycle maps, information on end-of-trip facilities (parking, showers, and lockers) as well as skills training for urban bicycling.

Discounted Transit Passes and Financial Incentives

Financial incentives are a means to encouraging commuters to try a different form of travel to work. They can also promote mode shift where parking prices are low compared to the price of transit.

Parking Pricing/ Parking Cash-Out

In situations where employers pay for parking, offering a payment in lieu of free parking (parking cash-out) is a way to provide a financial incentive without eliminating an employee benefit

Transportation Cost Analysis

People tend to underestimate the costs of automobile transportation and overestimate its convenience. Conversely, people tend to overestimate the costs of other transportation choices and underestimate their convenience. Simple analysis tools help people recognize how much time and money they are spending on transportation and

demonstrate how much money and time they can save with currently available alternatives.

Manage Parking Supply

Parking management is one of the most powerful tools available to manage transportation demand. Abundant commuter parking holds parking prices down, which encourages drive-alone trips that add to congestion and reduce overall mobility. TDM efforts should seek ways to meet transportation demand with the smallest practicable amount of structured parking. TDM efforts should also seek to use existing parking spaces in ways that maximize their economic growth potential.

Land Use Code requirements and conditions can promote parking management in ways that support TDM:

- Low (or no) minimum parking requirements
- Parking maximums where appropriate
- Bicycle Parking requirements based on land use (short- and long-term)
 - Link bicycle parking requirements to land use (rather than a ratio of bicycle parking to automobile parking)
 - Develop requirements for short term and long-term bicycle parking.
 - Draft bicycle parking design guidelines (location, access, security, etc.)

Implementing TDM Programs:

The City of Seattle works with other government agencies, businesses, developers, and transit service providers to implement TDM programs. The City and its TDM partners should continue, strengthen, and expand the breadth of TDM programs

Commute Trip Reduction Networks

Existing business networks exist to promote TDM through Commute Trip Reduction (CTR) programs. Employers with 100 or more peak-period commuters at a single work site are required by law to implement CTR programs. The City of Seattle contracts with King County Metro Transit to facilitate CTR programs in SLU.

Business Associations

CTR programs geared toward larger businesses typically don't reach small employers. Working through business associations is another way to reach more employers.

Neighborhood Organizations

In mixed-use neighborhoods, working with residential and community organizations can support TDM strategies such as shared parking, car sharing, and ride sharing.

Transportation Management Associations

Transportation Management Associations (TMAs) can provide a variety of parking management and TDM services to large and small businesses. Typical functions include ridesharing promotion and facilitation (ride matching and parking); bicycle promotion and bicycle parking programs; transit pass sales and distribution; and marketing to increase mode choice awareness.

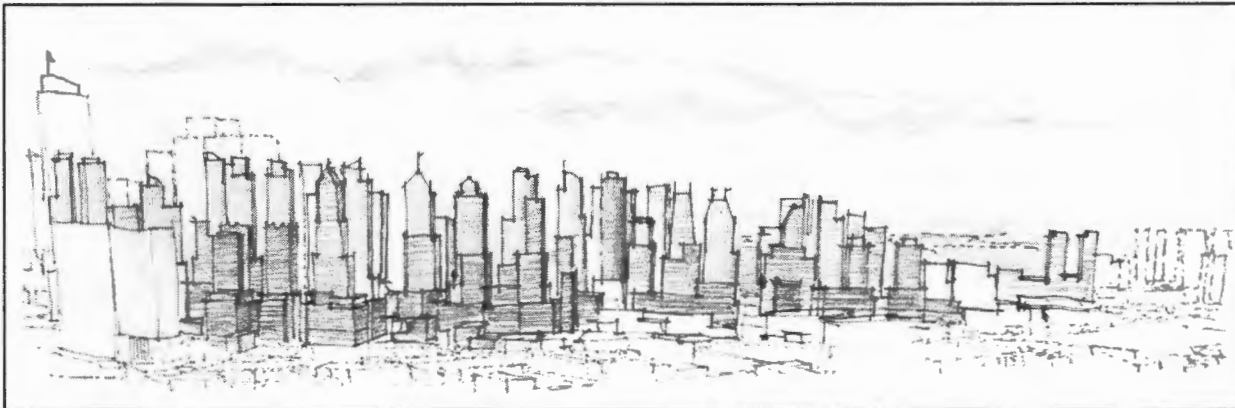
Area-wide goals and performance monitoring

Explore use of area-wide performance standards, in place of building-based or employer-based standards. Alternative approaches may reduce the costs of monitoring and compliance with land use requirements. Area-wide goals and monitoring would likely require the coordination of a TMA or similar organization.

Appendix C

Seattle Urban Form Study – Otak, Inc.

Seattle Urban Form Study



Submitted to:
City of Seattle
Department of Planning and Development

October 11, 2004

Prepared by:
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Appendices

- A. Downtown Height/Density EIS Excerpts, Comparison of Alternatives
- B. Downtown Height/Density EIS Excerpts, Comparison of Future Conditions
- C. DMC Building Prototype Assumptions
- D. DMR Building Prototype Assumptions
- E. DOC2 Building Prototype Assumptions

Introduction

The City of Seattle is now considering changes to its downtown development standards that regulate building height and density. The expected environmental impacts of increasing building height and density in the downtown are described in the *Draft Environmental Impact Statement for Downtown Height and Density Changes*, November 2003. The EIS describes the impacts of three “action” alternatives and one “no action” alternative in accordance with the State’s Environmental Policy Act (SEPA), which also complies with the National Environmental Policy Act (NEPA). Please refer to Appendix A for EIS excerpts.

This Downtown Urban Form Study is intended to supplement the findings included in the EIS, with further consideration regarding how development regulations singularly and cumulatively impact urban form. The purpose of this work is to highlight the inter-relationship between development regulations, design guidelines, and types of building structures they support. The supplemental findings included in this study focus on residential high-rise structures and take into account four recent development prototype projects, innovative regulations applied in other cities, and feedback from local Seattle developers, architects and building officials.

The body of this report is organized into four sections. Main sections include:

- Introduction
- Seattle’s Current Development Standards
- Interviews with Local Development Experts
- High-Rise Regulations in Other Cities
- Synthesis of Findings

If you have any questions regarding this report, please contact Dennis Meier, City of Seattle, Department of Planning and Development at (206) 684-8270 or dennis.meier@ci.seattle.wa.us, or Todd Chase, Otak, Inc. at todd.chase@otak.com

Seattle's Current Development Standards

The City of Seattle's existing development standards provide development regulations with respect to allowed uses, building height, density, setbacks, and related considerations. Under existing zoning, residential structures in the Downtown EIS study area are not subject to density limits, and development standards do not specifically address overall building bulk or urban form. The Draft EIS for Downtown Height and Density Changes identify four alternatives for changing allowed building heights and densities. Excerpts from the Draft EIS that summarize existing and potential building heights and densities for each EIS alternative are included in Appendix A.

This urban form study builds upon the information presented in the Draft EIS with more specific findings from four actual development projects:

- ***The Metropolitan Tower (DOC 2-300')*** – an example of a large residential project recently built in the DOC 2 zone. This is considered a good example of maximizing allowed development in a zone without density limits nor substantive bulk controls for residential development.
- ***Cristalla (DMC 240)*** – a new project that is under construction, and permitted with maximum allowed density and little control over residential density limits or building bulk.
- ***McGuire (DMR 240)*** – Recent example of high-rise development built in Belltown's DMR 240 zone district. Development density and bulk controls are regulated through upper-level lot coverage reductions and maximum building floor plates.
- ***2200 Westlake (DMC 160)*** – This mixed-use project is now under construction as a primarily residential project. It will have multiple structures with housing, retail, hotel and parking areas. A noteworthy example since it illustrates how current development standards apply to an entire block that is redeveloping with multiple buildings rather than a single structure.

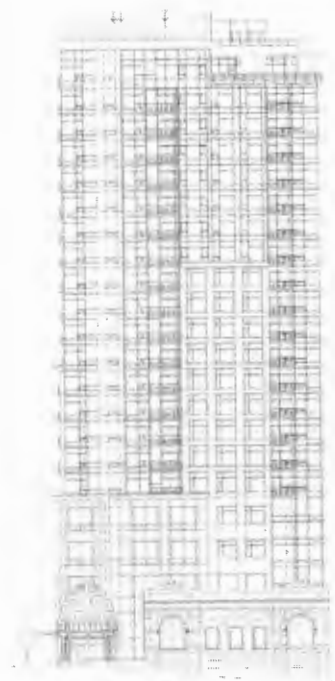
These projects are illustrated in Figure 1. Specific development characteristics are described in Table 1. Current development standards that apply to these four projects are identified in Table 2.

It should be noted that in addition to the development standards and regulations that apply to downtown development projects, downtown developers and designers must comply with the Downtown Design Guidelines administered by a design review board.

Figure 1. Seattle High Rise Housing Projects Designed Under Current Regulations



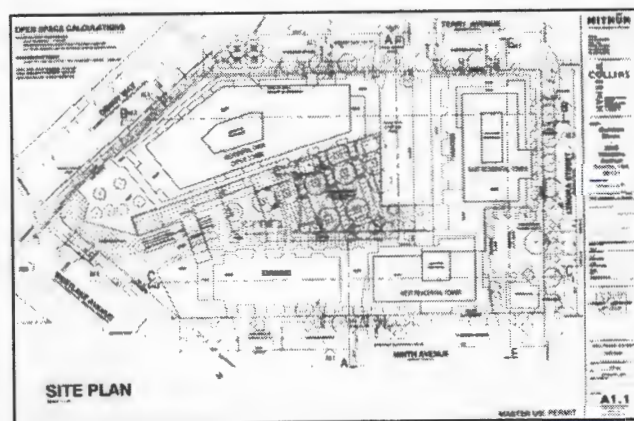
**Metropolitan Tower (DOC 2-300')
Seattle, Washington**



Cristalla (DCM - 240')



McGuire (DMR 240')



2200 Westlake (DMC 160')

Table 1
Summary of Case Study Projects
Downtown Seattle Urban Form Study
Summary of Case Study Projects, Development Program

	Metropolitan Tower	Cristalla	McGuire	2200 Westlake
Address	1942 Westlake Ave	2033 2nd Ave	2512 Second Ave.	2200 Westlake
Zone	DOC 2 300	DMC 240	DMR 240	DMC 160
Year Built	2001	Under Construction	2000	Under Construction
Developer	Continental-Bentall LLC	Cristalla LLC	Harbor Properties	Urban I, LLC
Architect	Callison Architecture	Weber+Thompson	Hewitt Architects	Mithun Architects
Lot Size	24,960 Sq. Ft. (.57 acres)	19,440 Sq. Ft. (.45 acres)	25,440 Sq. Ft. (.58 acres)	111,679 Sq. Ft. (2.56 acres)
Gross Sq. Ft.	538,339	391,016	338,548	902,478 (includes parking structure)
Net Rentable Sq. Ft.	326,182	251,122	219,619	500,000 +/-
Number of Units	366 units	186 units	272 Units	5 Building/Mixed-Use Development includes: 160 Room, 5 Star Hotel 47,000 Sq. Ft. Grocery Store 261 Condominium Homes (1,800 SF per Unit) 39,000 Sq. Ft. of Shops, Restaurants, Luxury Spa 5,700 Sq. Ft. Full Service Bank East Residential Tower - 11 Levels (950 SF per Unit) West Residential Tower - 12 Levels (1,300 SF per Unit)
Average Size	Range in Unit Size: 511-1458 SF Avg. Unit Size: 1031 SF	Range in Unit Size: 603-2819 SF Avg. Unit Size: 1300 SF	Range in Unit Size: 465-1171 SF Avg. Unit Size: 895 SF	Retail Sales & Service - 2 levels (91,500 GSF) Mixed- Use Tower/Admin. Office - 6 levels (134,596 GSF) Mixed-Use Tower/Residential - 5 levels (86,982 GSF) East Residential Tower - 11 levels (96,029 GSF) West Residential Tower - 12 levels (111, 775 GSF) Residential Base - 3 levels (58,783 GSF)
Number of Stories	31 (373'-8" HT)	23 + 3 bsmt. (240')	25 (343' & 4' parapet = 347')	

**Table 1 (cont.) Summary of Case Study Projects
Downtown Seattle Urban Form Study
Summary of Case Study Projects, Development Program**

	Metropolitan Tower	Cristalia	McGuire	2200 Westlake
Parking	386 stalls	228 stalls	233	781 stalls
Retail and/or Office	Retail	Retail	both	Both
Multiple Bldgs. on Same Lot?	No	No	no	5
Recreation Requirement	18,303 Sq.Ft. Resident lounge/garden terrace/pool/spa	13,969 Sq. Ft. Lobby, 6th floor, roof	12,619 Sq. Ft.	12,617 Sq. Ft.
Construction Class	Reinforced Concrete	I-FR	Structural Steel	
Site Plan?	No	Yes	no	Yes
Elevation Dwg?	yes - Westlake Alley view	yes	no	
Tower Floor Plate	Levels Street to P7 (0 to 71'-4") Floor plates are 23,200 SF	At Grade: 19,440 SF From Grade to Floor 6: 18,270 SF	0-65': 25,440 SF 66-85': 14,256 SF 86-125': 12,980 SF 126-240': 7,990 SF	North Tower Level 1: 16,563 SF Retail/Hotel North Tower Level 2: 12,069 SF Hotel North Tower Levels 3-9: 9,661 SF each Hotel North Tower Levels 10-18: 7,970 SF each Residential NT Roof houses the majority of the HVAC equipment: 7,970 SF West Tower Level 1: 8,742 SF Residential and 13,898 SF Retail West Tower Level 2: 7,402 SF Residential and 11,704 SF Retail West Tower Levels 3: 10,066 SF Residential West Tower Levels 4-12: 10,055 SF each Residential WT Roof: 10,065 SF South Tower Level 1: 5,038 SF Residential and 4,650 SF Retail South Tower Level 2: 12,940 SF Residential South Tower Level 3: 11,363 SF Residential South Tower Level 4-15: 9,113 SF Residential ST Roof: 9,113 SF
Range	511-1458 SF	603-2819 SF	465-1171 SF	Averages East Tower: 950 SF West Tower: 1300SF North Tower: 1800 SF
Average Unit Size	1301 SF	1300 SF	895 SF	

Table 2 Summary of Current Development Regulations Applied to Case Study Projects
Downtown Seattle Urban Form Study
Summary of Case Study Projects, Zoning Regulations

Zone	Metropolitan Tower	DMC 240	Cristalla	McGuire	DMC 160	2200 Westlake
Max. Height	DOC 2 300 300 ft (15' above max. height is allowed for stairs and elevator Penthouses and Mechanical Equipment) see note 1	240 ft (see note 2)		240 ft (see note 2)	160 ft (see note 2)	
Floor Area Ratio	Base FAR: 5, Max FAR: 10 (residential uses are not subject to density limits and is not counted in FAR calculations)	Base FAR: 5, Max FAR: 7 (residential uses are not subject to density limits and not counted in FAR calculations)		Base FAR: 2 Max FAR: 5 (residential uses are not subject to density limits and not counted in FAR calculations)	Base FAR: 5, Max FAR: 7 (residential uses are not subject to density limits and not counted in FAR calculations)	
Open Space Lot Coverage	see note 3 Generally, 100% lot coverage allowed up to 125 feet. Any structure with less than 15,000 gsf floor plate is exempt from upper level limits. Above 125 feet, buildings with floor plates over 15,000 sq. ft. are subject to coverage limits in areas along "street frontages."	see note 3 Generally, 100% lot coverage allowed up to 125 feet. Any structure with less than 15,000 gsf floor plate is exempt from upper level limits. Above 125 feet, buildings with floor plates over 15,000 sq. ft. are subject to coverage limits in areas along "street frontages."		see note 3 0-65' - 100% 66-85' - 55% 86-125' - 50% 126-240' - 40%	see note 3 Above 125 feet, buildings with floor plates over 15,000 sq. ft. are subject to coverage limits in areas along "street frontages."	
Floor size	floors above 125 ft - max size 80% of gross floor area of floor below 125 ft	At Grade: 19,440 SF From Grade to Floor 6: 18,270 SF Floor 7-22: 16,160 SF Floor 23: 13,650 SF		floors above 125 ft - max size of 8,000 sq. ft.	N/A	
Parking requirements	.7 stalls/1000 Sq. Ft. retail It. .5 stalls/1000 Sq. Ft. retail St. .94 stalls/1000 Sq. Ft. office It. .1 stalls/1000 Sq. Ft. office St.	.7 stalls/1000 Sq. Ft. retail It. .5 stalls/1000 Sq. Ft. retail St. .94 stalls/1000 Sq. Ft. office It. .1 stalls/1000 Sq. Ft. office St.		.7 stalls/1000 Sq. Ft. retail It. .5 stalls/1000 Sq. Ft. retail St. .94 stalls/1000 Sq. Ft. office It. .1 stalls/1000 Sq. Ft. office St.	.7 stalls/1000 Sq. Ft. retail It. .5 stalls/1000 Sq. Ft. retail St. .94 stalls/1000 Sq. Ft. office It. .1 stalls/1000 Sq. Ft. office St.	
Max. Parking (see note 4)	1 stall/1000 Sq. Ft. non-res. (no parking requirement for residential use)	1 stall/1000 Sq. Ft. non-res. (no parking requirement for residential use)		1 stall/1000 Sq. Ft. non-res. (no parking requirement for residential use)	1 stall/1000 Sq. Ft. non-res. (no parking requirement for residential use)	
Min. Sidewalk and Alley Widths	Based on street classification	Based on street classification		Based on street classification	Based on street classification	
Affordable housing	no requirement	no requirement		no requirement	no requirement	
Lot Size	N/A	N/A		min. 19,000 Sq. Ft.	N/A	
Landscape	No minimum requirement, but 50% of setback area must be landscaped when setbacks are provided	No minimum requirement, but 50% of setback area must be landscaped when setbacks are provided		1.5 x length of property for landscaping along sidewalks	No minimum requirement, but 50% of setback area must be landscaped when setbacks are provided	
Setback	(1) No setback limits shall apply up to an elevation of fifteen (15) feet above Sidewalk grade. (2) Between the elevations of fifteen (15) and thirty-five (35) feet above sidewalk grade, the facade shall be located within two (2) feet of the street property line The maximum setback shall be ten (10) feet.	(1) No setback limits shall apply up to an elevation of fifteen (15) feet above Sidewalk grade. (2) Between the elevations of fifteen (15) and thirty-five (35) feet above sidewalk grade, the facade shall be located within two (2) feet of the street property line The maximum setback shall be ten (10) feet.		40' above 65'	(1) No setback limits shall apply up to an elevation of fifteen (15) feet above Sidewalk grade. (2) Between the elevations of fifteen (15) and thirty-five (35) feet above sidewalk grade, the facade shall be located within two (2) feet of the street property line The maximum setback shall be ten (10) feet.	

Notes:

1/ Height increase of up to 20% above mapped height limit allowed though TDC and other conditions.

2/ Height increase of up to 40% above mapped height limit allowed though TDC and other conditions.

3/ 5% of gross floor area provided as common recreation area for use by residents. Up to 50% of open space can be provided as interior space. Green streets abutting a site can be improved to meet part of requirement.

4/ For mixed use commercial/housing projects, no parking is required for retail and service uses up to 30,000 square feet in high transit access areas and 7,500 square feet elsewhere.

Seattle Urban Form Study

6

Otak

As a starting point in this urban form study, Otak interviewed six local development experts from both public and private sectors. These interviews were intended to gather subjective input from professionals that work with Seattle's downtown development standards, regulations and guidelines on a continuous basis. Interview results are provided in Appendix B. the professionals participating in the interview process included:

- A summary of their input and feedback is organized by topic area below.

Height dictates the structural system. The 85-foot limit is of little value – it doesn't offer enough flexibility. Because zones have a base, you get a high percentage of coverage until a certain height and then the setback applies. Developers want to maximize the envelope so they are forced to deal with awkward shapes. (DH)

Height thresholds impact coverage allowance. Because of coverage restrictions after a certain height in Downtown zones, you get pushed into building in a clumsy form. The city needs to permit sculptural opportunities for architects. (DH)

The single most important influence on building form, given the FAR, is the height limit when it comes to speculative office buildings and high-rise residential because it's mostly about building proportion. (MS)

One critical factor is the high-rise threshold of 75', especially for residential design. This triggers a series of expensive life safety building systems and components that cause a developer to amortize the increased cost over a much larger structure comprised of more units. Once the high-rise threshold is exceeded the limiting factor is normally the height limit established in a given zone. Again a developer needs to maximize the given development potential. (MS)

Current development standards provide "no freedom in building design." "The floor plate setbacks impose an unimaginative "wedding cake" building form. Seattle should allow 50% of the buildings first 85' height to be carved out artistically and the lot coverage above 85' should be 50% with 10,000 SF floor plates. (GS)

For Type 1 construction there are no limits on height and density. The International Building Code (IBC) requires a moment frame for back up structural support to the concrete core during a seismic event. (JS)

There is a 160 feet height limit on a concrete sheer wall system. Although, a tall sheer wall system has been approved through peer review. Built examples of tall sheer wall systems are Nordstrom Tower, Millennium Tower and IDX Tower. (JS)

Density most definitely dictates the building's form. One other aspect to developing a site is the Land Residual Analysis. This formula will dictate what you can pay for land based on the cost of developing the property. Allowing more density will make a smaller in-fill site more developable because density helps pay for the price of the land. (WJ)

It is important to maximize the efficiency (rentable/sellable space) of the floor plate. An 85% efficiency rate is sufficient. The ideal floor plate size is about 12,000 Sq.Ft. (WJ)

For buildings that exceed 240' height, IBC dictates a redundant system of a moment frame. The moment frame helps resist lateral forces for a percentage of the building mass during a seismic event. The aesthetic draw back to this backup structural system is that a wall is required above and below the floor slab. The most efficient system is a sheer core system with two-foot thick concrete. This system allows glass from ceiling to floor. Vancouver allows 300'- 400' height buildings with no moment frame. In Seattle, the IBC is open to peer review and alternative structural systems can be presented to avoid redundant systems. (BW)

IBC changed the 16 foot setback rule for development on alleys to 20 foot setback (each development gives up 2 feet i.e. $2' + 2' + 16' \text{ alley} = 20'$). This forces each developer to give up developable land (2 feet x the length of the property). (BW)

Steel doesn't pencil for high-rise residential. Steel has to be fireproofed. In addition, the price of steel has risen. The most cost efficient system is post tension concrete slab with a concrete core. (BW)

Explain the impacts of code requirements on choice of construction type.

After the 1994 Northridge Earthquake, the cost of steel moment frames went up because every connection had to be fortified. In addition, the cost of steel in the US is rising. The rising cost of steel construction has made concrete construction more attractive. Concrete is a local and cost efficient building material. (JS)

Buildings above 75 feet high require smoke/fire controls in the form of pressurized stair and elevator shafts, break out glass (1 tempered glass window for every 50 feet), fire pumps, and emergency generators. Building code requires high-rises less than 160 feet high have a minimum of 1 elevator and high-rises greater than 160 feet high have a minimum of 2 elevators served by separate and fire protected mechanical rooms. (JS)

The core (stairs, elevators, etc.) of the building always impacts the form. A smaller core will allow for a smaller floor plate creating a slender building. Seattle does not currently allow "scissors stairs" for high rises, but Vancouver does. This design creates a smaller core allowing for more units. (WJ)

Type 1 construction is typical for certain types of lower-rise residential. Steel is preferred but is not used as often because of its thickness takes away from floor plate. You can lose 2-3 floors using steel. Most use concrete slab b/c it is only 8". The Energy Code doesn't understand the nature of high-rise residential structures. The Code was written for residential structures not for high-rise development. (DH)

If you are talking about entitlement code, there is little impact. In the past, environmental issues concerning reflectance glass were a big issue, but recently there are few code mandates. Currently the process relies on design review to define materials through established guidelines. (MS)

What are the key factors that make a building marketable?

It used to be different, but rental and condominiums are nearly identical when it comes to average unit size and floor plate sizes. Generally in residential high-rise housing developments developers try to stay below 15,000 SF to make them exempt to upper development regulations. Office building floor plate sizes vary from 18,000 SF to 24,000 SF, although many tenants are looking for even larger floor plate sizes. I would say the average for residential is about 62' x 180' in a bar, or 'L' configuration with stepping; they could also be in the neighborhood of 90' x 90' for square configurations. Office structures are normally 120' wide by 180' - 210' average. Office structures have a tendency to have larger bases largely do to the demand of newer
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tenants to have floors larger than 25,000 SF. Developers will normally go for the limit on height and FAR. (MS)

Beyond a given location, residential high-rise is about views, views and views. Balconies (Lanais) no matter how usable are a given. Flexibility in the unit design is important. Unit sizes are going down as the price or rent of unit climbs. (MS)

Natural light is important. Vancouver developers usually provide taller slender towers that have glass on all sides, which allows more views and light. Tall buildings should have 9-foot floor-to-floor heights to allow more light and better ventilation. (GS)

Balconies should not be mandated since above a certain height high winds make them uncomfortable. (GS)

Light is a major factor. Outdoor balconies are not much needed in upper floors of high-rise buildings because of the wind. An atrium setting is more appropriate. Accommodating needs by providing flexibility in floor plans is becoming an important element. (DH)

Building skin material is also a factor – people are getting particular about what they want. Glass and metal are big marketing points as is concrete and steel. People are leery of wood because vulnerable skin-coverings. (DH)

People are looking for quality buildings with longevity. People want usability – storage, quality kitchens, etc. Height isn't a factor in the residential market. (DH)

Location is a big factor. People like views and a sense of safety at the street level. This would include street level activity at all times of the day and night. Visitor parking is also important. People like aesthetically pleasing buildings as well. I think the design review process will help with aesthetic appeal. (WJ)

Not sure what the future market conditions are for new condo/apartment units. The trend used to be empty nesters who want 2 bedrooms or 1 bedroom/den. Now, younger professionals are buying smaller, more affordable studios/1 bedroom units. Right now, the market can not predict what people will want in 5 years. (WJ)

In order for high-rise development to pencil, a building efficiency ratio of 85% must be met. This means that the area of dedicated to building infrastructure i.e. stairs, elevators, vents, mechanical rooms, common areas, etc. can not exceed 15%. When the

building plate becomes smaller, the challenge is keeping the infrastructure area in check to allow for enough units to justify the building cost. (BW)

The Cristalla has an 85% efficiency ratio. The Cristalla's floor plate is 13,500 SF with 32 foot and 16 foot setbacks from the adjacent streets. The building has no blank walls. (BW)

How do the design guidelines influence material choices, building shape and the street environment?

I think the biggest effect is the street environment and where design guidelines seems to be more specific (relatively speaking). The materials of the high-rise are somewhat limited, and driven by cost and technology, but it's up to the designer to create the composition to provide appropriate uniqueness and interest to the design. Once you are about 30' above the street, the materials tend to blend and it's more about color and amount of solid/void space. (MS)

Quality designers would exceed the guidelines. Design guidelines can actually inhibit good design and cause consensus architecture. The Guidelines take some of the edge out of designing. If architects were policing themselves, guidelines wouldn't be needed. (DH)

The design guidelines encourage good behavior and allow certain projects to fit into the urban context. The guidelines also create blandness. You can't legislate good design. (DH)

Definition of street level retail is too restrictive. There needs to be more freedom in the design review process in regards to street-level uses. In Vancouver, there is a mixture of residential, offices retail and other neighborhood services at the street level. This mixture of street level uses creates an urban village and reduces the possibility of street level vacancies. (GS)

The code in Belltown created a walled city (blank building facades). SODO needs to be re-examined to encourage density, especially along future transit lines. (GS)

Sidewalks must establish a clear zone so pedestrians are not impeded by street furniture. (JS)

Building form is mostly a zoning code level issue. The design review board process helps ensure the intent of the design guidelines is met. In addition, infill development should be response to the existing urban pattern. (BW)

How does the energy code encourage or discourage sustainable development?

The energy code is counter-productive to sustainable development. We need to remove impediments to sustainable development and promote the use of rainwater, energy efficient lighting and mechanical systems and allow more sunlight in buildings and on the street. (GS)

The energy code doesn't encourage glass. The intent is to prevent energy loss by minimizing the amount of glass openings. Maximum amount allowable glass openings is calculated as a percentage of the building's floor area. However, this approach relies on artificial lighting. The drawback to artificial lighting is that it also consumes a lot of energy and building occupants generally prefer natural daylight. Buildings may exceed the maximum amount of glazing by providing alternative shading devices and energy saving measures. (JS)

The energy code is restrictive. The city needs to take a holistic view at the situation. People are saving energy when they live downtown and walk to work and to run errands. The city should adopt a policy statement addressing the benefits of downtown housing development. This policy statement needs to say, "Housing density in downtown is good for these reasons...." Transportation and sustainability are just two of those reasons. (WJ)

The Washington State Energy Code is designed for single family residential. With high-rise residential buildings, heat loss is never an issue. Heat travels vertically through the concrete slabs with little heat lost. The code puts restrictions on glazing;

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in turn making it hard to use glass. This forces developers to needlessly spend money on the buildings skin. Blaine recommends an energy code designed specifically for high-rise towers. (BW)

The Energy Code doesn't understand the nature of high-rise residential structures. The Code was written for residential structures not for high-rise development. (DH)

There is no relationship between sustainable development and the energy code. (DH)

What emerging code changes will likely impact future building design forms in the wake of 9-11 and the newly adopted International Building Code? Is there any latitude for amendments with the Seattle Building Code?

Safety is increasingly important. The code ensures that life safety measures have been met. Once the building is occupied, it becomes a building security issue. Buildings need to provide adequate outdoor lighting and safe, secure parking. (GS)

Tenants/owners today seem to bring up the issue of the World Trade Center and always ask questions about security and height. Recently these issues focus on the garage, building access, building air systems, and structure. Many recently completed towers have incorporated structural concrete cores, which house the vertical transportation (exiting) systems that seem to give high-rise tenants and dwellers a good degree of confidence of fire and impact resistance. The World Trade Center's core, in many places, consisted of nothing more than gypsum fireboard separating it from adjacent spaces. (MS)

Redundant systems are important for safety. Quality buildings can be designed with defensible systems. A good example is the King County Courthouse. (DH)

Vancouver uses scissors stairs. Their space efficient design allows for more or larger units per floor. They are pressurized and concrete sealed for fire safety. (GS)

Stairs are about getting out of the building safely. Two sets of alternative escape routes are required. Scissors stairs provide two separate entries to the same staircase. Vancouver and Portland have approved scissors stairs. Seattle will not allow scissors stairs. Seattle is in a Seismic 3 Zone. During a seismic event, a floor could collapse and thus make a portion of a scissors stair inaccessible. A collapse is unlikely to happen. The issue of fire-protection is accommodated with scissors stairs. The staircase has doors at opposite ends of the building, the stair shaft is pressurized to resist smoke, and the concrete shaft has two hour fire protection. (BW)

Seattle will not allow scissors stairs or interlocking stairs. Seattle will not allow a common wall between two stairs. In addition, Seattle requires a minimum separation of exits equivalent to 33% of the diagonal length of the building. (JS)

Requirement for separation between two stairs vary depending on the code:

- *Former UBC required 30' of separation*
- *IBC requires 0' of separation*
- *Seattle requires 15' of separation (JS)*

The city has recently adopted the IBC. There is one provision that needs to be changed. You can now only have 75% of unprotected openings on alleys. When the western portion is the alley, you can not take advantage of the views. This creates solid walls and is not visual appealing to anyone. The city should remove this IBC code so developers can take advantage of the views. (WJ)

Another issue closely related to safety is managing evening noise. Residents want it to be quiet at night. Clubs hours are regulated with legislation. For mixed-use development, external and horizontal soundproofing is very important. (GS)

General Comments

In addition to feedback on the specific questions, many of the interview candidates provided additional input for consideration by the City and its consultant team. Additional general comments are mentioned below.

I think height limits are the bane of great design. Look only to our recent past and the whole proliferation of squatty buildings. When it comes to sunlight at the street, a squatty building will do even more to reduce access of light to the street. When it comes to commercial development, a private developer will always look to maximize the development potential of a site especially with the high price of land. Thus he will always attempt to fill up the prescribed envelope. As for residential which is non-chargeable FAR, the height limit for it is the same as commercial buildings thus a tendency for comparative scale thus similar bulk. MS

We need to encourage urban infill In order to meet the Growth Management Act and in turn take the pressure off of suburban and rural lands. Tailoring development standards for tall towers with smaller floor plates can bring more light to the street level and preserve more views. Plus, high-rise development allows for more downtown residential density that equates to a better urban village. (BW)

Seattle should change the definition of tall, slender towers to a 12,000 SF floor plate. The City should remove code impediments and add incentives to help developers hit their pro-formas. Vancouver's high-rise towers are 10,000 SF on average and have glass on all four sides. (BW)

DOC 1 and DOC 2 zones are not conducive to building tall and slender towers. Seattle needs to increase downtown residential by encouraging density. Currently, Downtown Seattle has four jobs for every one household. (GS)

Through urban infill development, we can comply with the Growth Management Act. In addition, providing housing near transit gives people alternative choices to passenger vehicles. We should incentivize sustainable development. The zoning code should reward developments that have green roofs, on site recycling collection areas, efficient HVAC systems, reuse rain water, are within walking distance to transit, have dedicated Flexcar spaces, and provide bicycle facilities. (GS)

Currently, the FAR is 100% for residential, we propose 95% FAR to provide more open space, sunlight, and pedestrian amenities at the street level. This could be achieved through height incentives. (GS)

There is a challenge in the city to find infill development sites. The only way to develop on a small lot is by increasing density. I suggest a 50% increase in DMC 240 this would put density at 360 feet. We need downtown housing – there needs to be separation in the code when addressing residential vs. office towers. (WJ)

The city needs to realize that parking for residential buildings doesn't necessarily increase traffic. People want/need a car on the weekends or for a trip to the grocery store. Parking needs to be provided for people but there is no correlation to increased traffic. This is a very important element. A parking space increases the marketability without affecting traffic. Perhaps DPD could conduct a study analyzing people who live downtown and how they commute/run errands (walk, bus, bike, drive, etc.) to determine that adding parking does not increase traffic. (WJ)

The City could add incentives to the code to encourage tall, slender buildings. Some bonuses for density are already in place. For instance, Columbia Tower received a density bonus for providing an interior retail arcade. Similar incentives should be created that allow taller building heights for residential high rise structures. (BW)

Here are some additional ideas for height bonuses (BW):

- *In Alternative 1 (240'-312' height), reward a smaller floor plate (10,000 to 12,000 SF) with a 20% height bonus. The City benefits with visually more pleasing buildings, more light to the street level and preserved view corridors.*
- *Grant a height bonus for providing at least 10% affordable units per building. This results in a percentage of smaller units per building. Providing affordable housing is a great asset for the City. Cities with a diverse population of ages and incomes thrive. Seattle needs more downtown work force (median income housing).*
- *Grant a height bonus for developing with sustainable building practices.*
- *Grant a height bonus for providing additional pedestrian amenities.*

High-Rise Regulations in Other Cities

Otak reviewed the development standards in selected cities to address the bulk of high-rise residential structures. Local comprehensive plans, development standards, design standards, and design guidelines were reviewed to ascertain potential impacts of these regulations on building form. The cities selected for this analysis include:

- Portland, Oregon;
- San Francisco, California; and
- Vancouver, British Columbia, Canada.

Portland, Oregon

Within the Central City Plan District, only the South Waterfront Sub-District contains specific code language dedicated to creating taller towers. In order to maximize views and connections to the Willamette River and the Willamette Greenway, standards limit the maximum north-south dimension of the building and identify east-west pedestrian and bicycle connections. However, with the exception of these regulations, tall buildings are regulated in Portland through height and FAR standards. Ensuring elements like adequate light, air and the sky to building ratio is considered in the design of buildings, and realized through the Design and Development Review Process, and the South Waterfront Design Guidelines.

Portland Skyline



Key findings include:

- Portland's downtown zoning, FAR and small block grid impact building form and density.
- Central Residential (RX) is the highest density residential zone. Maximum height is 250 feet. An additional 16 feet is allowed beyond 250 feet provided that height is required to house elevator and mechanical equipment.

- Maximum FAR in RXd zone is 12:1 and can only be achieved through the use of bonus density and TDR. TDR is only allowed between abutting lots when they are being jointly developed.
- Applicable bonus uses include: day care, retail, roof top gardens, percent to the arts, large dwelling units, middle income housing option, small development site, affordable housing replacement fund, and below-grade parking.

In the burgeoning South Waterfront Plan District (south end of downtown), a new set of development regulations have been adopted. The maximum FAR (for any allowed use) is 9:1, but the maximum building height is 325 feet. Building FARs and heights step up gradually from the Willamette River, and small block grids of 200*200 feet with east-west streets help to preserve views from upland neighborhoods to the west.

- Additional height beyond 325 feet can be approved provided buildings meet one of the following criteria: average floor to floor heights are 16 feet; or no floor area of the building above 75 feet is larger than 10,000 square feet.
- In the South Waterfront no more than 3:1 FAR may be earned through the use of bonuses or TDRs in combination with provision of additional public open space.
- The South Waterfront Design Guidelines and the Greenway Design Guidelines for the South Waterfront include specific regulations intended to affect urban form. Specific guidelines include: Develop River Edge Variety (A1-1), where projects must "vary the footprint and façade plane of buildings that face the Willamette River to create a diversity of building forms and urban spaces adjacent to the greenway."
- Building height and tower orientation standards in the South Waterfront are intended to provide visual access to the Willamette Greenway and the Willamette River from surrounding neighborhoods, visual access to surrounding peaks and ridges, and natural light along designated east-west streets and create urban form that is permeable.
- Generally buildings less than 75 feet in height have no limit on north-south dimensions, nor tower spacing.
- Buildings greater than 75 feet must comply with building dimension standards as well as tower separation standards. Tower separation standards require at least a 50-foot separation between towers, or additional limits on north-south building facades.
- With buildings over 250 feet in height, portions of the building must be at least 200 feet apart from other existing or planned structures at the 250+ foot height level. Note: this particular design standard has not yet been tested.

One recent example of Portland's design standards and Design Review Process is the recently approved Benson Tower project in downtown Portland. The Benson will become a slender condominium tower with a 3,700 +/- floor plate on a 13,000 square foot site

(130'x100'). When completed this elegant tower will be approximately 266 feet tall, with 24 stories above a ground level retail/common area, and below grade parking. The project will include 148 dwelling units. The Benson maximizes the available 12:1 FAR by taking advantage of a bonus density from below grade parking, which increases the base FAR from 8:1 to 12:1.

San Francisco, California

Creation of slender towers that allow for views of San Francisco's topography is necessary to retain the city's imagery and folklore. Unfortunately, rigorous seismic requirements prevent use of recent design innovations such as scissors stairs, where both sets of stairs share a single overall shaft but are separated by an internal wall. Larger more costly structural steel cores for buildings above 240-feet complicate creating distinctive high-rise residential towers in San Francisco. Consequently, compared to places like Vancouver BC (where floor plates typically range from 3,500 to 7,500 square feet), San Francisco's floor plates range between 7,500 square feet and 10,000 square feet.

Given a 10,000 square foot floor plate and a 1:1 goal of sky to building ratio, towers would need to be a minimum of 100 feet apart (or 140 feet if diagonal dimensions are considered). The distance between buildings is not expected to be significantly different than Vancouver BC, where buildings are typically a minimum of 100-feet apart, even though the minimum requirement is 80-feet.



San Francisco Skyline

Key findings from our review of San Francisco downtown regulations are summarized below.

- San Francisco's most innovative design and planning regulations are now being prepared for the Rincon Hill Special Use District, located on the west end of downtown along the San Francisco Bay. This new mixed-use development area is to be guided with specific development regulations that affect overall building height, bulk and orientation. The proposed standards are intended to create a slender, more elegant building form.
- Design considerations associated with increasing the building height and reducing the overall building mass:
 - Public Realm (R.O.W.)
 - At the street level, residential towers need to include wide sidewalks, street trees, street furnishings and public open spaces.
 - Massing and articulation of the building
 - Ground Floor Treatments

In general, pedestrian-oriented retail, residential, office or other community services are required on the ground floor of all street-facing frontages.
 - Podium Level
 - Buildings proposed in the Rincon Hill Downtown Residential Mixed Use District consist of a distinct podium and a rhythm of (evenly spaced) slender towers. The purpose of the podium level of the building is to create a continuous and cohesive street edge condition along the street. This model of development is practiced extensively in Vancouver BC.
 - In San Francisco, podiums are not to exceed 85 feet in height with an average minimum height of 50 feet.
 - Multiple residential entries from the street to ground floor units are encouraged within the podium level of the building. Individual ground floor units are required to be articulated every 25-feet to help differentiate individual units from the overall mass of the podium and express a rhythm of individual units.
 - Residential podium facades must be setback 5-10 feet from the property line and elevated a minimum of 3-feet with stoops, porches and landscaping. Interior spaces such as living and dining rooms should connect to the raised porches or balconies and serve as a transition from indoor spaces to outdoor spaces.
 - Ground floor podium facades not used for residential uses are required to employ retail, office or other community-oriented uses as a means of creating a pedestrian-friendly edge and visual interest along the ground floor. These non-residential ground floor uses require a minimum

clearance in height of 15-feet from the ground floor to the ceiling. Ground floor facades require a minimum of 60% transparent glazing.

- Requirements for creating slender sculptured point-towers.
 - Spacing Towers: Above 85-feet, buildings must be spaced a minimum of 115-feet apart. Given San Francisco's larger floor plates, 115-feet is the minimum separation to achieve a 1:1 sky to building ratio.
 - Bulk: Towers are encouraged to exhibit a minimum bulk to height ratio of 3.5 to 1 for buildings that are between 240-400 feet.

Note: Buildings between 85 and 300 feet cannot exceed a plan length of 100 feet and a diagonal length of 125 feet. The maximum average floor area for these buildings is 8,500 square feet.

Buildings between 301 and 400 feet cannot exceed a plan length of 115 feet and a diagonal length of 145 feet.

- Proposed regulations for floor areas shall be in accordance with site dimensions and proposed building heights (See Figure 2) as follows:
 - Buildings between 85 and 240 feet in height, average floor plates cannot exceed 7,500 square feet;
 - Buildings between 241 and 300 feet in height, average floor plates cannot exceed 8,500 square feet;
 - Buildings between 301 and 350 feet in height floor plates cannot exceed 9,000 square feet. Top third of building above podium level is subject to 10% volume reduction for tower sculpting.
 - Buildings between 351 and 400 feet floor plates cannot exceed 10,000 square feet. Top third of building above podium level is subject to 10% volume reduction for tower sculpting.
 - There are no bulk controls below podium levels (less than 85 feet);
- Floor plates: In San Francisco floor plates typically range from 7,500 to 10,000 square feet.
- Height Sculpting: A ten-percent volume reduction is required for any tower above 300-feet.
- Block Coverage: A maximum of three towers is proposed per block, with a tower defined as any building above 85-feet in height. San Francisco considers an ideal tower development to be 20% of the total block area.
- Lots with depths greater than 80 feet are allowed 100 % site coverage up to 85 feet in height, provided that the building's sitting and configuration assure adequate light and air.

- Lots with a depth of 80 feet or less are limited to 80 % lot coverage up to 85 feet in height.
- Buildings less than 85 feet in height are required to be built to all property lines that face public rights of way.
- Floor Area Ratio Controls (TDR Program): How much FAR a site can receive depends on the size of the parcel, proposed use and whether the parcel currently has an existing (historic) structure. Residential uses are exempt from FAR limits, pursuant to Planning Code Section 124(b). Commercial base FAR between 7 – 10:1 is allowed for the creation of an 85-foot podium. An additional 13-23:1 FAR is available to supplement the base commercial FAR and allow for the creation of towers. A district wide transfer of development rights program allows unused FAR to be used in other locations within the district.
- Techniques used to preserve light and air at the street:
 - Alleys or mid-block facing podiums above 45 feet must be setback 15 feet from the property line.
 - Street fronting entry podiums above 65-feet must be setback an additional 15-feet from the property line.
 - New street facing buildings located on the south side of the street are required to preserve a minimum 50-degree sun angle (solar access) above 45 feet. In order to achieve this requirement the building might need multiple setbacks. Within 60-feet of an intersecting cross street, stepping back the building is not required. Floor area devoted to towers is exempt from the setback requirement.

Figure 2. San Francisco's Proposed Bulk Control Standards

Vancouver, British Columbia

Many zones in the City of Vancouver allow for the development of residential towers. However, unlike the City of Portland and San Francisco where land use designations are applied to specific geographic areas, zoning in Vancouver is often applied on more of a block by block basis. This finer grain of land use controls and development standards are largely the result of the city's more intense development pattern. There are finite number of (infill) sites in the downtown. Consequently, planners have the opportunity determine zoning designations in relationship to surrounding developments and the city as a whole.

This more individualized approach to building residential towers and communities is also the result of planning that has occurred on large sites that are under a single ownership, or in planning sub-districts. In Vancouver, many of the recent tower developments have been guided by large master plan developments that have been prepared in conjunction with the city. In this development scenario, the value of each tower is tied to the larger value of the proposed neighborhood. As a result of this synergy, developers and architects are more willing to look at the cumulative impact of things like views, privacy, light and air on the proposed development.

The limited amount of land coupled with protection of the City of Vancouver's natural and scenic resources has created an environment where it is necessary to apply a more vertical approach to building, especially housing. This mindset is widely accepted in Vancouver, due to the city's dedication to creating quality "high-rise" architecture. Hence, the City of Vancouver is considered the model for developing residential towers with floor plates typically ranging between 3,500 square feet and 7,500 square feet.



Vancouver Skyline

Key findings from our review of Vancouver's development regulations are provided below:

- **Planning Principles**

- The following select design and development principles guide development in False Creek, a neighborhood characterized by a continuous and cohesive podium edge and a large number of residential towers.
 - **Views:** Water, mountain and landmark views should be considered from residences, public spaces, bridges and streets.
 - **Sunlight:** The form of development should maximize sunlight exposure to public and private open spaces.
 - **Water:** The form of development should enhance the openness and presence of the water and not overwhelm the natural water's edge.
 - **Imageability:** Within an overall unifying theme, distinctive character areas should be achieved to be compatible with surrounding areas, provide variety and respond to site influences such as views, parks, bridges, shopping areas and public facilities.
 - **Integration:** The form and pattern of buildings should respond to the street network and adjacent built up areas of the city.
 - **Public Realm:** A concept should be developed for street and sidewalk treatments, street furniture, plantings and walkways which achieves areas of distinctive character within a unifying theme and is attractive, durable, cost effective and reasonable to maintain.
 - **Safety:** Development should ensure (building) patterns and guidelines that foster safety and security

- **Architectural Character**

- In designing residential towers, Vancouver architects and developers are encouraged to divide the building into 3-4 zones, depending upon the height.
 - **Street / Base Zone** is designed to be about 4-6 stories and consists of combination row houses, town houses and flats. In order to promote a continuous and cohesive pedestrian environment, the base or podium is divided into distinct units. Changes in materials, types of windows and cornice details are typically employed in this zone to distinguish units from one another and to distinguish the base of the building from the taller tower parts of the building.

The City of Vancouver is often credited with the development of the model that calls for row houses in the base (podium level) of the building and along the street in combination with slim point towers. This approach is pedestrian-oriented as realized by eyes on the street, protection of view

corridors, creation of open spaces, and the development of semi-public rooms – porches, balconies and stoops.

- The middle zone often referred to as the terrace or tower zone typically integrates elements found in the base zone. At a minimum, horizontal and vertical datums are carried through this part of the building. The middle zone is predominately residential as realized by the palette of repetitive building materials and building elements: windows, and porches / decks.

A common thread through Vancouver tower developments is the use of timeless materials. Mid-rise and high rise towers may utilize a variety of building materials provided materials are carefully detailed to ensure compatibility. The range of appropriate materials includes brick, concrete, stucco, glass and metal.

- The (tower) top zone terminates the building. In Vancouver, BC the design of the top of the building is intended to contribute to the city's skyline. The most common practice for articulating how the building meets the sky is through sculpting the building's upper floors. This approach is not intended to dilute the importance of have a decorative cap. But it is imperative that the cap fits in with the sculpting of the upper floors and the larger building form.

- Development Standards

- The City of Vancouver's development of residential towers is guided by the following land use regulations:

- Minimum tower separation: 80 feet
Note: Because of the many overlay restrictions, Vancouver's towers are typically more than 100 feet apart.
- Master Plan Floor Area Ratio: 3 to 1
- Minimum Site Dimensions: 375 foot street frontage
- Minimum Lot Size: 45,000 square feet
- Street Setback: 40 feet
- Maximum Building Height: 300 feet
- Wall length in towers can be maximum of 80 feet long in any direction.

Note: The Development Permit Board can approve buildings up to 450 feet if they determine that the building has limited or no shadowing and view corridors are maintained.

- Minimum Sky to Building Ratio 1:1

The sky to building ratio is the minimum acceptable opening between buildings necessary to bring light and air to sidewalks and public open spaces.

Synthesis of Findings

The combination of findings from the evaluation of actual high rise residential projects, interviews, and city case studies is compared and synthesized in this section. The results indicate potential areas of consideration for City staff and elected officials as they prepare development code amendments and select a preferred alternative for the EIS.

Based on the results of the Draft EIS skyline impact analysis, it is apparent that all of the EIS Alternatives would likely result in similar impacts on the downtown skyline (please refer to Appendix B). While the existing stair-stepped pattern of graduated building heights would continue, the vast concentration of redevelopment in the Denny Triangle could result in a uniform wall or mesa of building structures that impede views of downtown from the north and northeast. Given the potential for development of large and bulk structures with uniform building heights, there will likely be adverse urban design impacts under any of the EIS Alternatives with the Denny Triangle and Denny Regrade areas, unless additional development standards or design standards are adopted.

It is apparent that the most significant change in urban design conditions over the next 20 years will occur in the Denny Triangle and Belltown areas. In these areas, the street blocks are typically longer (360 feet) than in the Commercial Core area (240 feet) and the street width in some areas is slightly narrower. The larger blocks, narrower streets, and lack of major physical or man made separation between lower density development patterns in the South Lake Union area, could lead to a dense urban environment that forms a "wall" between Downtown and adjacent areas such as South Lake Union and Pike Place. The potential to maximize building density and height with current development standards would likely exacerbate this urban condition, and lead to taller and bulkier, uniform buildings that would allow less sunlight and building variation than exists today. (Please refer to Appendix B)

High rise regulations that propose standards similar to those that apply in the Belltown high-rise residential zones would be expected to result in more slender high-rise towers, and more tower separations. This approach would provide a relatively better transition of development scale on the edges of abutting neighborhoods.

Structures in the DMR/C zone are allowed to cover 100 percent of the site area below the height of 65 feet. Above 65 feet, the allowed building coverage area is regulated according to lot size. For lots between 19,000 and 25,000 square feet, the building area above 65 feet is limited to 65 percent of the site until a height of 85 feet. From

Seattle Urban Forum Study

86 feet to 125 feet, site coverage drops to 55 feet; and from 126 to 240 feet, site coverage drops again to 45 percent. The minimum site size for a project exceeding 125 feet in height is 19,000 square feet, and the maximum floor size for a any portion of the structure exceeding 125 feet in height is 8,000 square feet.

As the Denny Triangle redevelops, thousands of new Downtown residents and employees will be added to an area that encompasses 39 city blocks or approximately 145 acres (including streets). Residential population density in this area could likely increase to nearly 40 people per acre by year 2020. Daytime employment livability within the emerging live/work environment in the Denny Triangle area can be optimized if the following factors are integrated into the pedestrian environment:

- Encourage uses at ground floor levels that provide services to residents and visitors during the day and night.
- Provide adequate lighting and landscaping that makes residents, employees and visitors feel safe and secure.
- Create diverse market-rate and affordable housing opportunities.
- Provide welcoming public open spaces and streets where residents need them. New green streets, parks and open spaces should be created or enhanced with attention toward passive and active recreational settings, and preservation of sunlit areas. Streets such as Westlake must become welcoming to pedestrians as well as vehicles. Sunlit locations will increase in importance overtime as more people move into the area, and new development reduces existing levels of sunlight and open space.
- Pedestrian and bicycle pathways and routes are convenient, safe, and well maintained.
- Transit facilities and service levels are convenient for pedestrians.
- Architectural treatment of buildings, urban design of sites, public art displays, plazas, and parks are integrated—yet provide an interesting and unique urban experience.

Table 3
Comparison of Residential High Rise Regulations Used in Selected Cities

The interviews with downtown development experts indicate that the existing regulations and development incentives could foster Downtown housing development that is contained in relatively bulky structures with minimal spacing between building floor plates. As such, Seattle may consider additional design

measures that result in buildings that are more consistent with local sunlight, wind mitigation, and open space objectives. Changes in design regulations should be crafted in a manner that does not result in adverse market/financial impacts on a developer's ability to provide housing and mixed-use development.

Figure 3 illustrates conceptual ways of providing the same amount of building floor-area onto a one-half block site. The massing image on the right depicts the likely result from existing regulations that control height limits more than building densities. The left image depicts higher building heights with more attention towards tower separation.

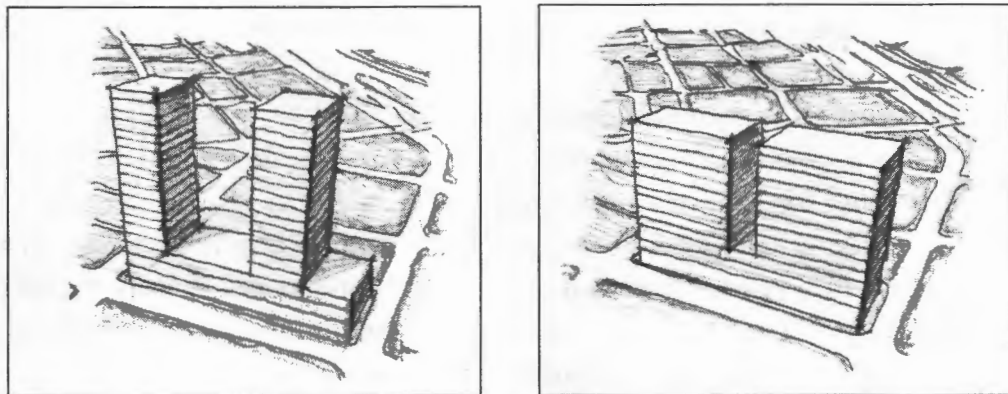


Figure 3. Density Alternatives – Two concepts for attaining equivalent amounts of development floor area. Figure on the left has a desirable air:building space ratio about 1:1, compared to figure on right with ratio of about 0.2:1.0.

Height and Density Considerations

It is apparent that the city of Seattle's current development standards would likely result in the construction of bulky massive buildings that would impact the urban feel of downtown and create a wall or mesa of buildings of similar height and scale.

Future development projects will most likely be designed by different architects, each with their own styles and approaches to design. While this is true of the existing buildings that shape downtown, the majority of buildings tend to have similar texture and color when viewed from a distance. Creativity should be encouraged to explore design ideas that will discourage similarity in the overall form of the city and enhance the variety of the character of the skyline.

Design is not just about architectural styles, it's about scale, proportion and arrangement of building components to enhance and define the character of the city.

The following mitigation measures are suggestions to help define a new neighborhood character in the Denny Triangle and other redeveloping urban areas of the city. The ability of the City and its architects to follow these guidelines will help result in a much more livable and appealing urban environment than would otherwise occur.

Table 4 provides a comparison among regulations in downtown Seattle DOC2 and DMR zones, where the majority of high rise residential development is projected to occur. Additional design standards from the case study cities are summarized as a basis for considering new techniques to enhance the downtown skyline and neighborhood character.

Key conclusions from this analysis are described below.

Reinforce the overall shape of the skyline

Tower articulation and spacing between adjacent developments will help to articulate the skyline shape. Large bulky buildings should be discouraged. Regulations should foster the creation of smaller towers with open space between buildings to provide light, air and views through blocks. Vary the heights of buildings to create interest along the tops of buildings. This objective could be accomplished through regulations that affect:

- Upper-level setbacks;
- Maximum floor plate sizes;
- Building dimensions;
- Variations in maximum height limits;
- Tower separations; and
- Tower air space to building ratio targets.

Potential mitigation of adverse building bulk impacts requires land use and building design standards that support greater variation in building heights and encourage proper upper-level setbacks, tower spacing and pedestrian oriented design of ground-level uses and open spaces. Such measures, if applied consistently, overtime could result in an improved building skyline, as envisioned by the illustration below in Figure 4.

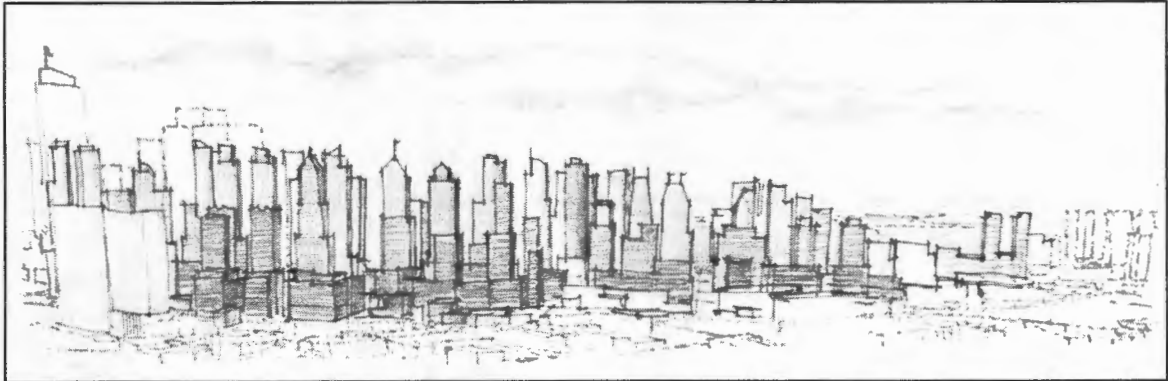


Figure 4. Potential future skyline view from Capitol Hill (with high-rise regulations)

Rooftop shapes and heights

Articulation of upper-level floors and rooftop penthouses will create a variety in building shapes. Existing downtown development regulations are subject to criticism by downtown developers and architects interviewed for this study for not allowing adequate flexibility to provide slender residential towers.

While the residential density is not subject to FAR constraints, the towers are subject to height limits. Hence, residential structures seeking to optimize development potential tend to utilize the majority of their buildable airspace. This results in bulkier structures than could otherwise be achieved if taller structures were allowed.

As evidenced by regulations in San Francisco and Vancouver B.C., allowing taller structures (up to 450+ feet) can still result in slender towers especially when additional regulations are adopted allowing or requiring tower sculpting, maximum floor plates, and maximum building dimensions.

Developers and architects interviewed for this study indicated interest in additional bonus height/density allowances for projects that provide smaller floor plates, taller floor-to-ceiling separations, affordable housing, LEEDtm certified sustainable buildings, and added pedestrian amenities.

Table 4.
Comparison of Development Regulations

Type of Standard or Guideline	Seattle's Current Situation in DOC2, DMC and DMR zones	Downtown EIS Alternatives for DOC2 and DMR zones	Notes and Considerations*
Increase allowable base building height	Code allows 160, 240 and 300 ft. heights, plus 30% increase through the TDC or certain conditions.	Alt.1: increases height to 165-340 ft (DMC); 300-400 ft (DOC2) Alt.2: increases height to 300-400 ft. DOC2; no change for DMC (other than 30% increase with TDC); Alt.3: increases height to 300-400 ft. for DOC2-240 only; 30% height bonus allowed through TDCs in most other zones	Maximum height in Portland's South Waterfront Dist. is 325 feet (excluding 16 ft. for HVAC). San Francisco's Rincon Hill District allows up to 400 feet; Vancouver allows 300 feet (buildings up to 450 feet. are allowed if building has limited shadowing and view corridors are maintained).
Increase allowable base FAR	Residential high-rise towers are not subject to FAR limits. Code allows 7 FAR (DMC) and 10 FAR (DOC2) for commercial uses.	Alt.1: increases commercial FAR to 10 (DMC); 13 FAR (DOC2-240); and 14 FAR (DOC2-300); Alt.2 : increases FAR to 13 (DOC2) and no change in DMC; Alt.3: increases FAR to 13 (DOC2-240), no change in most of DOC2-300 or DMC; reduces FAR to 4-5 in DMR/C.	Maximum FAR in Portland's South Waterfront Dist. is 12:1. San Francisco's Rincon Hill District does not subject residential uses to FAR limits.
Increase building height through bonus incentives * reward for smaller floor plates * reward for at least 10% affordable Dus * reward for LEEDtm buildings * reward for added pedestrian amenities	Code allows height increases of up to 30% if certain conditions are met.	Height increases of up to 30% are allowed in Denny Triangle if certain conditions are met, under Alts. 2 & 3.	Portland: buildings over 325 ft. in height can be approved provided towers either have limited size of floor plates to less than 10,000 (above 75 ft. elevation) or provide 16 foot floor heights.
Increase building FAR through bonus incentives	Code allows density increases if certain conditions are met.	Alt. 1: Denny Triangle DMC districts allowed up to 3:1 FAR increase when certain conditions are met. Alt. 3 allows increases in certain DMC areas if on-site housing is provided.	Bonus of up to 4:1 FAR allowed in Portland if certain conditions are met; San Francisco's FAR often predicated by presence of historic structures. District wide TDR available in San Francisco.
Regulate upper level setbacks	In DOC2 zones, above 125 feet, buildings with floor plates over 15,000 sq. ft. must provide setbacks of 20' from street and 60' from intersection. DMR zone includes "wedding cake" style upper-level setbacks starting at 66 ft. Buildings with less than 15,000 sq. ft. floor plates are exempt from upper level setback requirements.	Areas subject to DMR standards under Alt. 3 would include additional bulk controls on upper floors, including coverage limits and maximum wall dimensions.	San Francisco: 100% site coverage allowed for the podium (up to 85 ft. high); Towers over 85 feet are generally subject to building dimension and floor plate standards, and solar access standards. Portland and Vancouver generally regulate upper level setbacks through building dimension and floor plate standards, and view corridor guidelines.
Regulate building floor plates	No minimum or maximum. Buildings with less than 15,000 sq. ft. floor plates are exempt from upper level setback requirements.	Areas subject to DMR standards under Alt. 3 would be subject to maximum floor plate sizes of 8,000 square feet above height of 125 feet.	San Francisco: towers between 85-300 feet have maximum average floor plates of 8,500 feet; average maximum plates are 9,000 feet for 301-350 ft buildings; and 10,000 ft. for 351+ SF towers. Portland: buildings over 75 ft heights are limited to floor plates no larger than 10,000 sq. ft.

Building setbacks and Tower Spacing

Building setbacks and tower spacing standards should be encouraged to sculpt and shape the building massing based upon aesthetics and proportions. Upper-level setbacks help relate new development to the scale of adjacent smaller buildings and historic landmark structures, as indicated in Figure 5. However, some flexibility or variance from upper-level setbacks may be provided as long as developers comply with other regulations such as:

- Maximum floor plates;
- Tower separation;
- Tower sculpting;
- Air space to building ratios; and
- Maximum building dimensions.

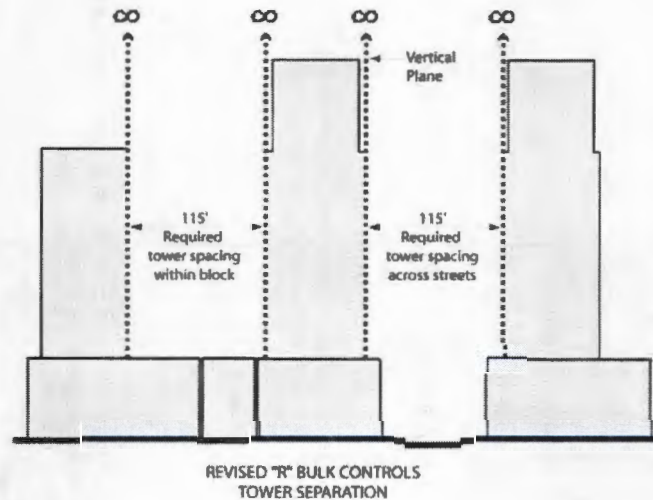


Figure 5. San Francisco's Proposed Tower Spacing Standards*

Open spaces, alleys and streetscapes

Providing open spaces, maintaining alleys and creating pedestrian friendly streetscapes support an active street life and encourages smaller massing of the buildings above. Successful public open spaces are places where people want to be in an urban outdoor setting. When integrated well into a city, successful public open spaces strengthen economic development, civic activity, social interaction and a citizen's sense of pride.

**Source: Rincon Hill District, Proposed Development Standards, San Francisco Planning Department, 2004.*

Alleys divide blocks into smaller sizes and increase the building frontages. If alley vacations are allowed then the development should be encouraged to respect the alley on the upper levels by breaking the massing into smaller buildings providing open spaces above that encourage light and air.

Residential and commercial development

Residential high-rise towers should be more slender and varied in exterior articulation. Buildings should be designed with finer grained exterior elements such as windows and/or balconies to distinguish the buildings from commercial towers by creating shadow lines and texture on the facades. Note, some developers and architects would like to have more flexibility from complying with the regulation that requires outdoor balconies for towers in light of high winds and inclement weather.

Layering of architectural materials such as glass, steel concrete and stone on the facades of buildings can help to break up bulky massing and help to emphasize setbacks and building features, making them distinctive from surrounding development.

New development should respect existing adjacent building by articulating heights and facades with setbacks, facade treatment, scale and proportions of building

elements, change in materials and entrance locations. New development should relate in scale to existing building's cornice lines, street-wall heights and facades with scale elements, material textures and color to help preserve the pedestrian scale of the street.

Wind Impacts

Tall buildings and structures can strongly influence the wind and shadow patterns. In urban areas, groups of tall structures can slow down winds near ground level, because of the friction and drag of the structures themselves. Buildings that are much taller than surrounding structures intercept and redirect winds that might otherwise flow overhead. The redirected wind, traveling down the face of tall structures, is called "downwash." Downwash wind conditions can generate ground-level turbulence, which is incompatible with a safe and secure pedestrian environment.

Generally, the taller the buildings are relative to surrounding structures, the stronger the downwash conditions. These intercepted winds can be especially strong if the upwind buildings are much shorter than the taller buildings, and can be diminished when the height of upwind buildings is similar to the height of the subject building. If the building provides a wide face to the wind, more air will flow down the face of the building toward the ground level. In summary, both height and bulk can affect wind conditions at the street level.

Potential wind impacts on the pedestrian environment can be controlled by building design features that redirect wind away from pedestrian areas. Typically, it is sufficient to provide substantial horizontal structures near the base of tall buildings and upper-level setbacks to help intercept and redirect the downwash. This design strategy is usually effective at mitigating wind impacts for both taller towers as well as lower, bulkier buildings.

Natural Light

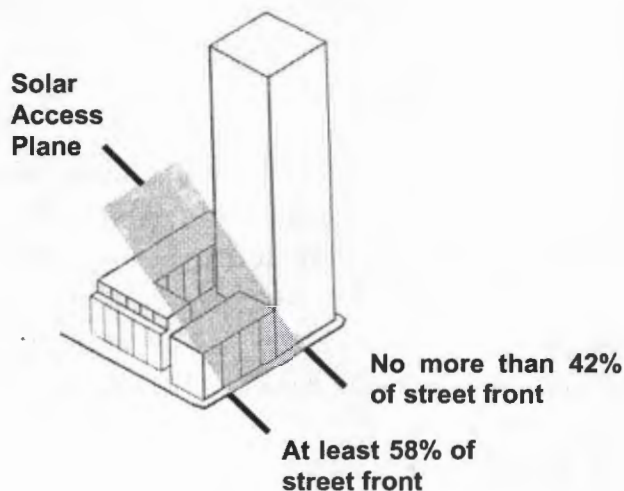
Sunlight is a rare yet highly appreciated weather feature of Seattle. Sun exposure and shading affects pedestrian comfort in Downtown. On a clear day, pedestrians expect to encounter both shade and sunshine on sidewalks and open spaces, and may or may not adjust their routes to favor one or another, according to temperature. Shade usually does not result in safety issues, except for rare icy conditions in the winter.

Seattle's existing Statewide Environmental Policy Act (SEPA) regulations already protect against shadowing effects of new development on specific public open spaces and parks in Downtown, including Freeway Park, Westlake Park, Steinbrueck Park, Convention Center Park, and Kobe Terrace/I.D. Community Garden.

Shadows cast by new development not only impact public open space and street environments, but also affect overall livability and the work environment. Studies have shown that work spaces with access to natural light can contribute to increased productivity of employees, increased retail sales, and reduced use of overhead lighting, which conserves energy. Bulky buildings, which cast shadows on adjacent areas, tend to have a greater impact on the production of shading than taller more slender high-rise structures.

Developers and architects identified natural light as an important marketing factor for downtown residential projects. The City should consider innovative standards, such as air space to building ratios and sunlight (solar) protection measures (as used in San Francisco) to ensure that adequate natural light penetrates the pedestrian environment, as shown in Figure 6. Interior natural light and sustainable energy solutions can be enhanced by encouraging taller floor-to-ceiling heights in towers through bonus height/density allowances, as in the case of Portland, Oregon.

Figure 6. San Francisco's Solar Access Standards



Analysis of Mitigation Measures

The following figures are intended to convey the massing and urban design differences between existing and potential development regulations. The development concepts shown include approximate massing within prototypical DOC2, DMC and DMR zones on half-block development sites. Underlying assumptions for this analysis are provided in Appendix C, D and E.

The building prototypes shown in Figures 7, 8 and 9 include an illustrative example of a new high-rise tower prototype that assumes tower sculpting incentives/regulations are adopted.

The Tower Sculpting prototype images shown in the following figures all represent a measurable and noticeable change from the development prototypes likely to result under existing regulations as well as the types of high rises supported by the Downtown Height/Density EIS Alternatives. The added tower height combined with reduced building floor plates and regulated tower separations can result in taller more slender towers with an increase in housing densities (dwellings per acre) above current standards of approximately:

- The amount of air space above the 65-foot high “building podium” is another means to compare the building prototypes. Current Seattle regulations, which support potentially bulky structures in DOC2 and DMC zones, can limit the amount of sunlight, air space and views. The high rise prototypes with tower sculpting incentives/regulations result in much greater amounts of urban air space between tower structures.

The added tower height combined with reduced building floor plates and regulated tower separations can result in taller more slender towers with an increase in air space above the 65-foot podium level can result in the following beneficial impacts:

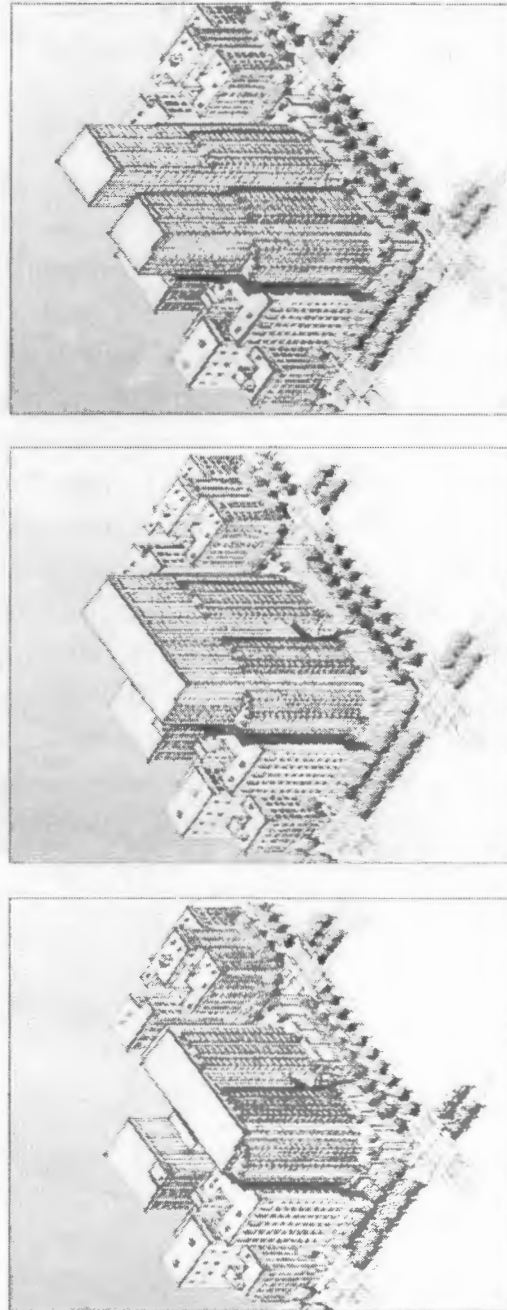
- change from 38% to 98% air-to-building ratio in DOC 2;
- change from 53% to 99% air-to-building ratio in DMC; and
- change from 73% to 77% air-to-building ratio in DMR.

Based upon these findings, it is recommended that the City of Seattle consider new development standards that include a mix of regulations and incentives that foster taller more slender residential high rises in downtown. While various high rise regulations are already codified in the City of Seattle, the results of this study indicate that the development community would desire more flexibility and freedom to design taller more slender structures that transcend current height limits.

Existing and proposed development standards in cities such as San Francisco, Portland and Vancouver B.C. suggest that development standards need not be overly onerous to be successful. An incentive-based approach that allows taller residential high-rise structures (400 to 450 feet) when certain conditions are met regarding tower separations, floor plate sizes, and/or air to building space ratios should be considered. This approach, when combined with updates to Seattle's existing Energy Code (e.g. allow more glass surface area) and Building Code (e.g. allow more openings along alleys) would accommodate more housing and create desirable urban living conditions – resulting in a skyline that characterizes a 21st Century world-class city.

Figure 7. DMC Zoning Prototypes

DMC Zoning (based on 240' x 120' half-block development site)



DMC-240 (Existing Regulations)

DMC-240 (EIS Alternative 1)*

DMC-240 (With Tower Sculpting Incentives)**

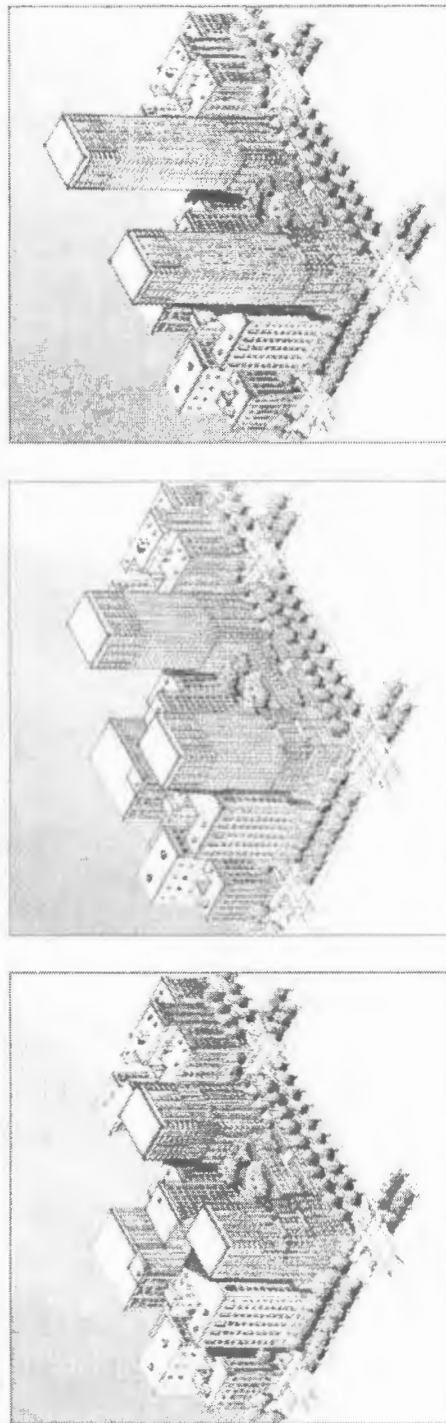
Element	Units	DMC-240	DMC-240	DMC-240
Gross Site Area	SF	28,800	28,800	28,800
Net Site Area	SF	28,800	28,800	28,800
Building Height	Feet	240	340	400
Air Space Ratio Over Podium	Ratio	0.53	0.95	0.99
Building Floor Area Ratio	Gross FAR	18.28	21.67	23.03
Residential FAR (Net)	Net FAR	12.99	15.87	15.33
Residential Dwellings per Acre	Dwellings/Acre	666	813	786
Total Dwellings Units	Dwellings	440	538	519
Total Commercial SF	NSF - Floor Area	12,240	-	12,240
Parking Spaces per Dwelling	Spaces	0.84	0.84	1.03
Above Ground Parking	Spaces	206	247	370
Below Ground Parking	Spaces	165	206	165

* Based upon Alternative 1, highest allowed building heights described in the Downtown Seattle Height and Density Changes, Draft Environmental Impact Statement, November 2003.
 ** This option is intended to represent taller building height allowances with new regulations and incentives intended to affect building form.
 Source: Analysis by Otak, Inc. Please see Appendix for detailed assumptions and calculations.

Figure 6 Seattle Urban Form Study, Building Prototype Assumptions

Figure 8. DMR Zoning Prototypes

DMR Zoning (based on 240' x 120' half-block development site)



DMR (Existing Regulations)

DMR/C (EIS Alternative 1)*

DMR/C (With Tower Sculpting Incentives)*

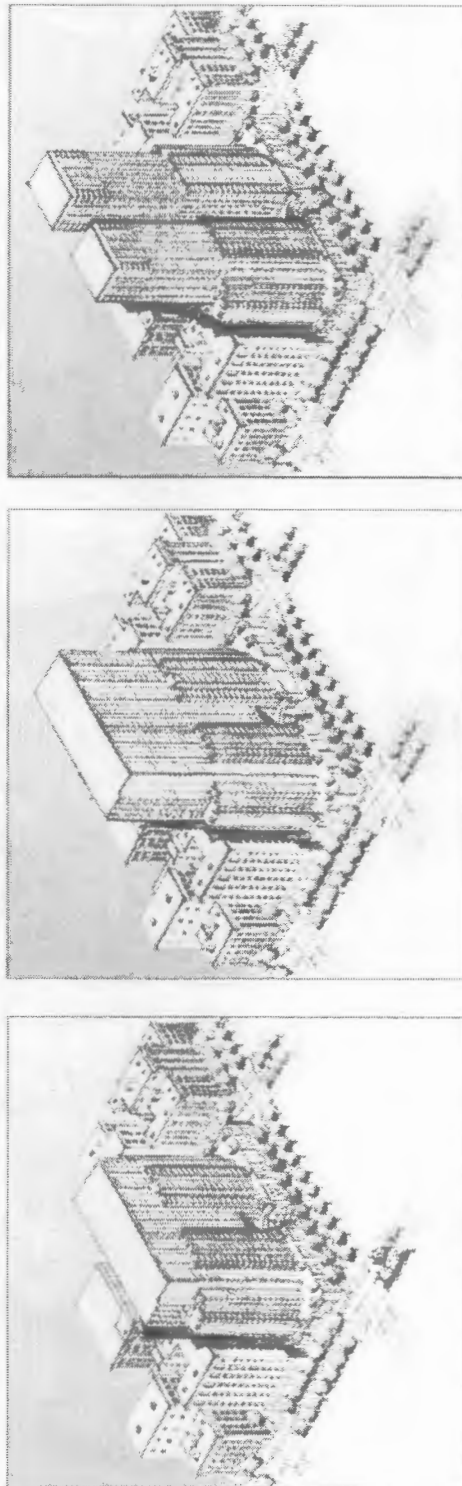
Element	Units	DMR	DMR/C	DMR/C
Gross Site Area	SF	28,800	28,800	28,800
Net Site Area	SF	28,800	28,800	28,800
Building Height	Feet	240	340	450
Air Space Ratio Over Podium	Ratio	0.73	0.76	0.77
Building Floor Area Ratio	Gross FAR	13.14	20.92	27.23
Residential FAR (Net)	Net FAR	10.32	14.38	18.91
Residential Dwellings per Acre	Dwellings/Acre	529	737	969
Total Dwelling Units	Dwellings	350	487	641
Total Commercial SF	NSF - Floor Area	12,240	12,240	12,240
Parking Spaces per Dwelling	Spaces	1.06	0.93	0.83
Above Ground Parking	Spaces	206	288	370
Below Ground Parking	Spaces	165	165	165

* Based upon Alternative 1, highest allowed building height described in the Downtown Seattle Heights and Density Changes Draft Environmental Impact Statement, November 2003. This option is intended to represent taller building heights allowance with new regulations and incentives intended to affect building form. Sources: Analysis by Otak, Inc. Please see Appendix for detailed assumptions and calculations.

Figure 7 Seattle Urban Form Study, Building Prototype Assumptions

Figure 9. DOC Zoning Prototypes

DOC2 Zoning (based on 360' x 120' half-block development site)



DOC2-300 (Existing Regulations)

DOC2-300 (EIS Alternative 1)^a

DOC2-300 (With Tower Sculpting Incentives)^{a,b}

Element	Units	DOC2-300	DOC2-300	DOC2-300
Gross Site Area	SF	43,200	43,200	43,200
Net Site Area	SF	43,200	43,200	43,200
Building Height	Feet	300	300	450
Alt-Space Ratio Over Podium	Ratio	0.38	0.38	0.98
Building Floor Area Ratio	Gross FAR	22.69	29.64	22.06
Residential FAR (Net)	Net FAR	15.89	20.09	17.16
Residential Dwellings per Acre	Dwellings/Acre	81.4	1,030	879
Total Dwellings Units	Dwellings	809	1,021	872
Total Commercial SF	NSF - Floor Area	18,360	18,360	18,360
Parking Spaces per Dwelling	Spaces	0.97	1.00	1.03
Above Ground Parking	Spaces	420	660	540
Below Ground Parking	Spaces	360	360	360

^a Based upon Alternative 1, highest allowed building height described in the Downtown Seattle Height and Density Change, Draft Environmental Impact Statement, November 2001.
^b This option included to represent taller building height allowance with new regulations and incentives intended to affect building form.
 Source: Analysis by Otak, Inc. Please see Appendix for detailed assumptions and calculations.

Figure 8 Seattle Urban Form Study, Building Prototype Assumptions

Appendices

*Appendix A –
Draft EIS Excerpts
Comparison of EIS Alternatives*

**Table 6
Comparison of Alternatives**

Alternative 1-High End Height and Density Increases	Alternative 2 – Concentrated Office Core
• 135-foot height increase in DOC 1 and 100-foot increases in all Denny Triangle zones • 30% height increase in zones at edge of office and retail cores • 4 FAR maximum density increase in Denny Triangle DOC 2 zone and 3 FAR maximum density increase in other zones • 1 FAR increase in base FAR in DOC 1 zone and DOC 2 zones outside Denny Triangle; 2 FAR increase in base FAR in DMC zones and DOC 2 zone in Denny Triangle. • No TDC in Denny Triangle zones	• 100 and 135-foot height increases to the DOC 1 and DOC 2 zones • 30% height increase only at southern edge of office core • 3 FAR maximum density increases in DOC 1 and DOC 2 zones • No increase in base FAR • No height or density changes in western or northern DMC zones at periphery of the office/retail core • TDC limited to DMC zones in Denny Triangle
Alternative 3 – Residential Emphasis	Alternative 4 – No Action
• 135-foot height increase in DOC 1 and 100-foot increase in Denny Triangle DOC 2 between 5th/6th and 8th Avenues, west to Blanchard St. • No other height increases • 3 FAR maximum density increase in DOC 1 and same DOC 2 area described above • No increases in base FAR • Rezone Denny Triangle mixed use area between Westlake, Howell and Minor Ave. from DMC to DMR/C, lowering density from 7 FAR to 5 and 4. This re-orientes the zoning to mixed residential development. • Rezone Belltown southern edge from DMC to DMR/C, lowering density from 7 FAR to 5. • In other Denny Triangle and Commercial Core DMC zones, require the development of <u>non</u>-residential density (above the base) to be contingent upon including on-site housing. • TDC remains in all Denny Triangle zones except portion of DOC 2 with height and density increases.	• No changes in allowable height or density • Existing optional height increases would be available, through use of bulk limitations, use of TDC program, preservation of landmarks or small structures on-site, or provision of on-site open-space usable to public. • Optional height increases range from 10% to 30% above mapped height limits.

Source: SPO, 2002

*Appendix B –
Draft EIS Excerpts
Comparison of Buildout Conditions*

Figure 10



*Appendix C –
DMC – 240 Prototype Assumptions*

Appendix C-1

Seattle Urban Form Study

DMC-240 Building Prototype Assumptions, Existing Regulations

line #	Element	Units	Notes
1	Gross Site Area	28,800 SF	assumes 240x120 ft. block
2	Net Site Area	28,800 SF	deducts ROW for alley and sidewalks
3	Building Height	240 Feet	per existing code
4	Air Space Envelope	6,912,000 CF	line 1 x line 3
5	Building Space Envelope	5,518,000 GCF	line 19 plus lines 24 & 29
6A	Air to Building Space Ratio	0.25 ratio	(line 4 minus line 5) divided by line 4
6B	Air Space Ratio Over Podium	0.53 ratio	(line 4 - line 19)/(line 5 - lines 19 & 24) - 1
7A	Building Floor Area Ratio	18.28 Gross FAR	line 12 plus lines 20 & 25
7B	Residential FAR (Net)	12.99 Net FAR	(line 8 * 850 sf/du) divided by line 1
7C	Residential Dwellings per Acre	666 Dwellings/Acre	(line 8 divided by line 2) * 43,560
8	Total Dwelling Units	440 Dwellings	line 17 plus lines 22 & 27
9	Total Commercial SF	12,240 NSF-floor area	line 13
10	Above Ground Parking	206 Spaces	line 15
11	Below Ground Parking	165 Spaces	assumes 2 levels (with 0.84 space/du)
12	Base Level (0-35' level)	86,400 GSF-floor area	3 levels
13	Commercial - NSF	12,240 NSF-floor area	Ground Floor, 85% efficiency ratio
14	Parking Area - NSF	72,000 NSF-floor area	2.5 levels
15	Parking Spaces	206 Spaces	assumes 350 sf per parking space
16	Residential - NSF	- NSF-floor area	none
17	Residential - Dwellings	- Dwellings	assumes 850 sf per dwelling
18	Common/Other Area	2,160 NSF-floor area	Line 12 minus lines 13, 14 and 16.
19	Building Envelope	1,008,000 GCF	240' x 120 x 35'
20	Level II (35-65' level)	66,000 GSF-floor area	3 levels
21	Residential - NSF	56,100 NSF-floor area	5 levels, 85% efficiency ratio
22	Residential - Dwellings	66 Dwellings	assumes 850 sf per dwelling
23	Common/Other Area	9,900 NSF-floor area	Line 20 minus line 21.
24	Building Envelope	660,000 GCF	220' x 100 x 30'
25	Level IIIA (65-125' level)	132,000 GSF-floor area	6 levels
26	Residential - NSF	112,200 NSF-floor area	6 levels, 85% efficiency ratio
27	Residential - Dwellings	132 Dwellings	assumes 850 sf per dwelling
28	Common/Other Area	19,800 NSF-floor area	Line 25 minus line 27.
29	Building Envelope	1,320,000 GCF	220' x 100 x 60'
30	Level IVA (125-240' level)	242,000 GSF-floor area	11 levels
31	Residential - NSF	205,700 NSF-floor area	11 levels, 85% efficiency ratio
32	Residential - Dwellings	242 Dwellings	assumes 850 sf per dwelling
33	Common/Other Area	36,300 NSF-floor area	Line 30 minus line 31.
34	Building Envelope	2,530,000 GCF	220' x 100 x 115'

Appendix C-2

Seattle Urban Form Study

DMC- (340) Building Prototype Assumptions, EIS Alt. 1 High-End Density

line #	Element		Units	Notes
1	Gross Site Area	28,800	SF	assumes 240x120 ft. block
2	Net Site Area	28,800	SF	deducts ROW for alley and sidewalks
3	Building Height	340	Feet	per EIS Alt. 1
4	Air Space Envelope	9,792,000	CF	line 1 x line 3
5	Building Space Envelope	6,384,000	GCF	line 19 plus lines 24 & 29
6A	Air to Building Space Ratio	0.53	ratio	(line 4 minus line 5) divided by line 4
6B	Air Space Ratio Over Podium	0.95	ratio	(line 4 - line 19)/(line 5 - lines 19 & 24) - 1
7A	Building Floor Area Ratio	21.67	Gross FAR	line 12 plus lines 20 & 25
7B	Residential FAR (Net)	15.87	Net FAR	(line 8 * 850 sf/du) divided by line 1
7C	Residential Dwellings per Acre	813	Dwellings/Acre	(line 8 divided by line 2) * 43,560
8	Total Dwelling Units	538	Dwellings	line 17 plus lines 22 & 27
9	Total Commercial SF	-	NSF-floor area	line 13
10	Above Ground Parking	247	Spaces	line 15
11	Below Ground Parking	206	Spaces	assumes 2.5 levels (with 0.84 space/du)
12	Base Level (0-35' level)	86,400	GSF-floor area	3 levels
13	Commercial - NSF	-	NSF-floor area	none
14	Parking Area - NSF	86,400	NSF-floor area	3 levels
15	Parking Spaces	247	Spaces	assumes 350 sf per parking space
16	Residential - NSF	-	NSF-floor area	none
17	Residential - Dwellings	-	Dwellings	none
18	Common/Other Area	-	NSF-floor area	Line 12 minus lines 13, 14 and 16.
19	Building Envelope	1,008,000	GCF	240' x 120 x 35'
20	Level II (35-65' level)	86,400	GSF-floor area	3 levels
21	Residential - NSF	73,440	NSF-floor area	3 levels, 85% efficiency ratio
22	Residential - Dwellings	86	Dwellings	assumes 850 sf per dwelling
23	Common/Other Area	12,960	NSF-floor area	Line 20 minus line 21.
24	Building Envelope	864,000	GCF	240' x 120 x 30'
25	Level III (65-125' level)	132,000	GSF-floor area	6 levels
26	Residential - NSF	112,200	NSF-floor area	6 levels, 85% efficiency ratio
27	Residential - Dwellings	132	Dwellings	assumes 850 sf per dwelling
28	Common/Other Area	19,800	NSF-floor area	Line 25 minus line 27.
29	Building Envelope	1,320,000	GCF	220' x 100 x 60'
30	Level IV (125-240' level)	167,200	GSF-floor area	11 levels
31	Residential - NSF	142,120	NSF-floor area	11 levels, 85% efficiency ratio
32	Residential - Dwellings	167	Dwellings	assumes 850 sf per dwelling
33	Common/Other Area	25,080	NSF-floor area	Line 30 minus line 31.
34	Building Envelope	1,672,000	GCF	190' x 80 x 110'
35	Level V (240-340' level)	152,000	GSF-floor area	10 levels
36	Residential - NSF	129,200	NSF-floor area	10 levels, 85% efficiency ratio
37	Residential - Dwellings	152	Dwellings	assumes 850 sf per dwelling
38	Common/Other Area	22,800	NSF-floor area	Line 25 minus line 27.
39	Building Envelope	1,520,000	GCF	190' x 80 x 100'

Appendix C-3

Seattle Urban Form Study

DMC- (400) Building Prototype Assumptions, High-End Height with Tower Sculpting Incentives

line #	Element		Units	Notes
1	Gross Site Area	28,800	SF	assumes 240x120 ft. block
2	Net Site Area	28,800	SF	deducts ROW for alley and sidewalks
3	Building Height	400	Feet	hypothetical
4	Air Space Envelope	11,520,000	CF	line 1 x line 3
5	Building Space Envelope	6,863,000	GCF	line 19 plus lines 24 & 29
6A	Air to Building Space Ratio	0.68	ratio	(line 4 minus line 5) divided by line 4
6B	Air Space Ratio Over Podium	0.99	ratio	(line 4 - line 19)/(line 5 - lines 19 & 24) - 1
7A	Building Floor Area Ratio (FAR)	23.03	Gross FAR	line 12 plus lines 20 & 25
7B	Residential FAR (Net)	15.33	Net FAR	(line 8 * 850 sf/du) divided by line 1
7C	Residential Dwellings per Acre	786	Dwellings/Acre	(line 8 divided by line 2) * 43,560
8	Total Dwelling Units	519	Dwellings	line 17 plus lines 22 & 27
9	Total Commercial SF	12,240	NSF-floor area	line 13
10	Above Ground Parking	370	Spaces	line 15
11	Below Ground Parking	165	Spaces	assumes 2 levels (with 1 space/du)
12	Base Level (0-55' level)	144,000	GSF-floor area	5 levels
13	Commercial - NSF	12,240	NSF-floor area	Ground Floor, 85% efficiency ratio
14	Parking Area - NSF	129,600	NSF-floor area	4.5 levels
15	Parking Spaces	370	Spaces	assumes 350 sf per parking space
16	Residential - NSF	-	NSF-floor area	none
17	Residential - Dwellings	-	Dwellings	none
18	Common/Other Area	2,160	NSF-floor area	Line 12 minus lines 13,14 and 16.
19	Building Envelope	1,584,000	GCF	240' x 120 x 55'
20	Level II (55' - 65' level)	28,800	GSF-floor area	1 levels
21	Residential - NSF	24,480	NSF-floor area	1 levels, 85% efficiency ratio
22	Residential - Dwellings	29	Dwellings	assumes 850 sf per dwelling
23	Common/Other Area	4,320	NSF-floor area	Line 20 minus line 21.
24	Building Envelope	288,000	GCF	240' x 120 x 10'
25	Tower 1 Level A (65-240')	144,500	GSF-floor area	17 levels
26	Residential - NSF	122,825	NSF-floor area	17 levels, 85% efficiency ratio
27	Residential - Dwellings	145	Dwellings	assumes 850 sf per dwelling
28	Common/Other Area	21,675	NSF-floor area	Line 25 minus line 27.
29	Building Envelope	1,487,500	GCF	85' x 100 x 175'
30	Tower 1 Level B (240-400')	100,800	GSF-floor area	16 levels
31	Residential - NSF	85,680	NSF-floor area	16 levels, 85% efficiency ratio
32	Residential - Dwellings	101	Dwellings	assumes 850 sf per dwelling
33	Common/Other Area	15,120	NSF-floor area	Line 30 minus line 31.
34	Building Envelope	1,008,000	GCF	70' x 90 x 160'
35	Tower 2 Level A (65-240')	144,500	GSF-floor area	17 levels
36	Residential - NSF	122,825	NSF-floor area	17 levels, 85% efficiency ratio
37	Residential - Dwellings	145	Dwellings	assumes 850 sf per dwelling
38	Common/Other Area	21,675	NSF-floor area	Line 25 minus line 27.
39	Building Envelope	1,487,500	GCF	85' x 100 x 175'
40	Tower 2 Level B (240-400')	100,800	GSF-floor area	16 levels
41	Residential - NSF	85,680	NSF-floor area	16 levels, 85% efficiency ratio
42	Residential - Dwellings	101	Dwellings	assumes 850 sf per dwelling
43	Common/Other Area	15,120	NSF-floor area	Line 30 minus line 31.
44	Building Envelope	1,008,000	GCF	70' x 90 x 160'

*Appendix D –
DMR Prototype Assumptions*

Appendix D-1
Seattle Urban Form Study
DMR-240 Building Prototype Assumptions, Existing Regulations

line #	Element		Units	Notes
1	Gross Site Area	28,800	SF	assumes 240x120 ft. block
2	Net Site Area	28,800	SF	deducts ROW for alley and sidewalks
3	Building Height	240	Feet	per existing code
4	Air Space Envelope	6,912,000	CF	line 1 x line 3
5	Building Space Envelope	4,583,400	GCF	line 19 plus lines 24 & 29
6A	Air to Building Space Ratio	0.51	ratio	(line 4 minus line 5) divided by line 4
6B	Air Space Ratio Over Podium	0.73	ratio	(line 4 - lines 19 & 24)/(line 5 - lines 19 & 24)
7A	Building Floor Area Ratio	15.14	Gross FAR	line 12 plus lines 20 & 25
7B	Residential FAR (Net)	10.32	Net FAR	(line 8 * 850 sf/du) divided by line 1
7C	Residential Dwellings per Acre	529	Dwellings/Acre	(line 8 divided by line 2) * 43,560
8	Total Dwelling Units	350	Dwellings	line 17 plus lines 22 & 27
9	Total Commercial SF	12,240	NSF-floor area	line 13
10	Above Ground Parking	206	Spaces	line 15
11	Below Ground Parking	165	Spaces	assumes 2 levels (with 1 space/du)
12	Base Level (0-35' level)	86,400	GSF-floor area	3 levels
13	Commercial - NSF	12,240	NSF-floor area	Ground Floor, 85% efficiency ratio
14	Parking Area - NSF	72,000	NSF-floor area	2.5 levels
15	Parking Spaces	206	Spaces	assumes 350 sf per parking space
16	Residential - NSF	-	NSF-floor area	none
17	Residential - Dwellings	-	Dwellings	assumes 850 sf per dwelling
18	Common/Other Area	2,160	NSF-floor area	Line 12 minus lines 13, 14 and 16.
19	Building Envelope	1,008,000	GCF	240' x 120' x 35'
20	Level II (35-65' level)	66,000	GSF-floor area	3 levels
21	Residential - NSF	56,100	NSF-floor area	3 levels, 85% efficiency ratio
22	Residential - Dwellings	66	Dwellings	assumes 850 sf per dwelling
23	Common/Other Area	9,900	NSF-floor area	Line 20 minus line 21.
24	Building Envelope	660,000	GCF	210' x 100' x 30'
25	Level IIIA (65-125' level)	54,000	GSF-floor area	6 levels
26	Residential - NSF	45,900	NSF-floor area	6 levels, 85% efficiency ratio
27	Residential - Dwellings	54	Dwellings	assumes 850 sf per dwelling
28	Common/Other Area	8,100	NSF-floor area	Line 25 minus line 27.
29	Building Envelope	540,000	GCF	100' x 90' x 60'
30	Level IVA (125-240' level)	87,780	GSF-floor area	11 levels
31	Residential - NSF	74,613	NSF-floor area	11 levels, 85% efficiency ratio
32	Residential - Dwellings	88	Dwellings	assumes 850 sf per dwelling
33	Common/Other Area	13,167	NSF-floor area	Line 30 minus line 31.
34	Building Envelope	917,700	GCF	95' x 84' x 115'
35	Level IIIB (65-125' level)	54,000	GSF-floor area	6 levels
36	Residential - NSF	45,900	NSF-floor area	6 levels, 85% efficiency ratio
37	Residential - Dwellings	54	Dwellings	assumes 850 sf per dwelling
38	Common/Other Area	8,100	NSF-floor area	Line 25 minus line 27.
39	Building Envelope	540,000	GCF	100' x 90' x 60'
40	Level IVB (125-240' level)	87,780	GSF-floor area	11 levels
41	Residential - NSF	74,613	NSF-floor area	11 levels, 85% efficiency ratio
42	Residential - Dwellings	88	Dwellings	assumes 850 sf per dwelling
43	Common/Other Area	13,167	NSF-floor area	Line 30 minus line 31.
44	Building Envelope	917,700	GCF	95' x 84' x 115'

Appendix D-2

Seattle Urban Form Study

DMR- (340) Building Prototype Assumptions, EIS Alt. 1 High-End Density

line #	Element		Units	Notes
1	Gross Site Area	28,800	SF	assumes 240x120 ft. block
2	Net Site Area	28,800	SF	deducts ROW for alley and sidewalks
3	Building Height	340	Feet	per existing code
4	Air Space Envelope	9,792,000	CF	line 1 x line 3
5	Building Space Envelope	6,247,400	GCF	line 19 plus lines 24 & 29
6A	Air to Building Space Ratio	0.57	ratio	(line 4 minus line 5) divided by line 4
6B	Air Space Ratio Over Podium	0.76	ratio	(line 4 - lines 19 & 24)/(line 5 - lines 19 & 24)
7A	Building Floor Area Ratio	20.92	Gross FAR	line 12 plus lines 20 & 25
7B	Residential FAR (Net)	14.38	Net FAR	(line 8 * 850 sf/du) divided by line 1
7C	Residential Dwellings per Acre	737	Dwellings/Acre	(line 8 divided by line 2) * 43,560
8	Total Dwelling Units	487	Dwellings	line 17 plus lines 22 & 27
9	Total Commercial SF	12,240	NSF-floor area	line 13
10	Above Ground Parking	288	Spaces	line 15
11	Below Ground Parking	165	Spaces	assumes 2 levels (with 0.9 space/du)
12	Base Level (0-45' level)	115,200	GSF-floor area	4 levels
13	Commercial - NSF	12,240	NSF-floor area	Ground Floor, 85% efficiency ratio
14	Parking Area - NSF	100,800	NSF-floor area	3.5 levels
15	Parking Spaces	288	Spaces	assumes 350 sf per parking space
16	Residential - NSF	-	NSF-floor area	none
17	Residential - Dwellings	-	Dwellings	assumes 850 sf per dwelling
18	Common/Other Area	2,160	NSF-floor area	Line 12 minus lines 13,14 and 16.
19	Building Envelope	1,296,000	GCF	240' x120 x 45'
20	Level II (45-65' level)	44,000	GSF-floor area	2 levels
21	Residential - NSF	37,400	NSF-floor area	2 levels, 85% efficiency ratio
22	Residential - Dwellings	44	Dwellings	assumes 850 sf per dwelling
23	Common/Other Area	6,600	NSF-floor area	Line 20 minus line 21.
24	Building Envelope	440,000	GCF	210' x100 x 20'
25	Tower 1 Level A (65-125')	54,000	GSF-floor area	6 levels
26	Residential - NSF	45,900	NSF-floor area	6 levels, 85% efficiency ratio
27	Residential - Dwellings	54	Dwellings	assumes 850 sf per dwelling
28	Common/Other Area	8,100	NSF-floor area	Line 25 minus line 27.
29	Building Envelope	540,000	GCF	100' x 90' x 60'
30	Tower 1 Level B (125-340')	167,580	GSF-floor area	21 levels
31	Residential - NSF	142,443	NSF-floor area	21 levels, 85% efficiency ratio
32	Residential - Dwellings	168	Dwellings	assumes 850 sf per dwelling
33	Common/Other Area	25,137	NSF-floor area	Line 30 minus line 31.
34	Building Envelope	1,715,700	GCF	95' x 84' x 215'
35	Tower 2 Level A (65-125')	54,000	GSF-floor area	6 levels
36	Residential - NSF	45,900	NSF-floor area	6 levels, 85% efficiency ratio
37	Residential - Dwellings	54	Dwellings	assumes 850 sf per dwelling
38	Common/Other Area	8,100	NSF-floor area	Line 25 minus line 27.
39	Building Envelope	540,000	GCF	100' x 90' x 60'
40	Tower 2 Level B (125-340')	167,580	GSF-floor area	21 levels
41	Residential - NSF	142,443	NSF-floor area	21 levels, 85% efficiency ratio
42	Residential - Dwellings	168	Dwellings	assumes 850 sf per dwelling
43	Common/Other Area	25,137	NSF-floor area	Line 30 minus line 31.
44	Building Envelope	1,715,700	GCF	95' x 84' x 215'

Appendix D-3

Seattle Urban Form Study

DMR- (450) Building Prototype Assumptions, High-End Height with Tower Sculpting Incentives

line #	Element		Units	Notes
1	Gross Site Area	28,800	SF	assumes 240x120 ft. block
2	Net Site Area	28,800	SF	deducts ROW for alley and sidewalks
3	Building Height	450	Feet	per existing code
4	Air Space Envelope	12,960,000	CF	line 1 x line 3
5	Building Space Envelope	8,071,000	GCF	line 19 plus lines 24 & 29
6A	Air to Building Space Ratio	0.61	ratio	(line 4 minus line 5) divided by line 4
6B	Air Space Ratio Over Podium	0.77	ratio	(line 4 - lines 19 & 24)/(line 5 - lines 19 & 24) - 1
7A	Building Floor Area Ratio	27.25	Gross FAR	line 12 plus lines 20 & 25
7B	Residential FAR (Net)	18.91	Net FAR	(line 8 * 850 sf/du) divided by line 1
7C	Residential Dwellings per Acre	969	Dwellings/Acre	(line 8 divided by line 2) * 43,560
8	Total Dwelling Units	641	Dwellings	line 17 plus lines 22 & 27
9	Total Commercial SF	12,240	NSF-floor area	line 13
10	Above Ground Parking	370	Spaces	line 15
11	Below Ground Parking	165	Spaces	assumes 2 levels (with 0.8 space/du)
12	Base Level (0-55' level)	144,000	GSF-floor area	5 levels
13	Commercial - NSF	12,240	NSF-floor area	Ground Floor, 85% efficiency ratio
14	Parking Area - NSF	129,600	NSF-floor area	4.5 levels
15	Parking Spaces	370	Spaces	assumes 350 sf per parking space
16	Residential - NSF	-	NSF-floor area	none
17	Residential - Dwellings	-	Dwellings	assumes 850 sf per dwelling
18	Common/Other Area	2,160	NSF-floor area	Line 12 minus lines 13, 14 and 16.
19	Building Envelope	1,584,000	GCF	240' x 120 x 55'
20	Level II (55-65' level)	22,000	GSF-floor area	1 levels
21	Residential - NSF	18,700	NSF-floor area	1 levels, 85% efficiency ratio
22	Residential - Dwellings	22	Dwellings	assumes 850 sf per dwelling
23	Common/Other Area	3,300	NSF-floor area	Line 20 minus line 21.
24	Building Envelope	220,000	GCF	210' x 100 x 10'
25	Tower 1 Level A (65-125')	54,000	GSF-floor area	6 levels
26	Residential - NSF	45,900	NSF-floor area	6 levels, 85% efficiency ratio
27	Residential - Dwellings	54	Dwellings	assumes 850 sf per dwelling
28	Common/Other Area	8,100	NSF-floor area	Line 25 minus line 27.
29	Building Envelope	540,000	GCF	100' x 90' x 60'
30	Tower 1 Level B (125-450')	255,360	GSF-floor area	32 levels
31	Residential - NSF	217,056	NSF-floor area	32 levels, 85% efficiency ratio
32	Residential - Dwellings	255	Dwellings	assumes 850 sf per dwelling
33	Common/Other Area	38,304	NSF-floor area	Line 30 minus line 31.
34	Building Envelope	2,593,500	GCF	95' x 84' x 325'
35	Tower 2 Level A (65-125')	54,000	GSF-floor area	6 levels
36	Residential - NSF	45,900	NSF-floor area	6 levels, 85% efficiency ratio
37	Residential - Dwellings	54	Dwellings	assumes 850 sf per dwelling
38	Common/Other Area	8,100	NSF-floor area	Line 25 minus line 27.
39	Building Envelope	540,000	GCF	100' x 90' x 60'
40	Tower 2 Level B (125-450')	255,360	GSF-floor area	32 levels
41	Residential - NSF	217,056	NSF-floor area	32 levels, 85% efficiency ratio
42	Residential - Dwellings	255	Dwellings	assumes 850 sf per dwelling
43	Common/Other Area	38,304	NSF-floor area	Line 30 minus line 31.
44	Building Envelope	2,593,500	GCF	95' x 84' x 325'

*Appendix E –
DOC2 Prototype Assumptions*

Appendix E-1

Seattle Urban Form Study

DOC2-300 Building Prototype Assumptions, Existing Regulations

line #	Element	Units	Notes
1	Gross Site Area	43,200 SF	assumes 360x120 ft. block
2	Net Site Area	43,200 SF	deducts ROW for alley and sidewalks
3	Building Height	300 Feet	per existing code
4	Air Space Envelope	12,960,000 CF	line 1 x line 3
5	Building Space Envelope	10,170,000 GCF	line 19 plus lines 24 & 29
6A	Air to Building Space Ratio	0.27 ratio	(line 4 minus line 5) divided by line 4
6B	Air Space Ratio Over Podium	0.38 ratio	(line 4 - line 19)/(line 5 - line 19) - 1
7A	Building Floor Area Ratio	22.69 Gross FAR	line 12 plus lines 20 & 25 / line 1
7B	Residential FAR (Net)	15.89 Net FAR	(line 8 * 850 sf/du) divided by line 1
7C	Residential Dwellings per Acre	814 Dwellings/Acre	(line 8 divided by line 2) * 43,560
8	Total Dwelling Units	808 Dwellings	line 17 plus lines 22 & 27
9	Total Commercial SF	18,360 NSF-floor area	line 13
10	Above Ground Parking	420 Spaces	line 15
11	Below Ground Parking	360 Spaces	assumes 3 levels (with 1 space/du)
12	Base Level (0- 65' level)	259,200 GSF-floor area	6 levels
13	Commercial - NSF	18,360 NSF-floor area	Ground Floor, 85% efficiency ratio
14	Parking Area - NSF	151,200 NSF-floor area	3.5 levels
15	Parking Spaces	420 Spaces	assumes 350 sf per parking space
16	Residential - NSF	73,440 NSF-floor area	2 levels, 85% efficiency ratio
17	Residential - Dwellings	86 Dwellings	assumes 850 sf per dwelling
18	Common/Other Area	16,200 NSF-floor area	Line 12 minus lines 13, 14 and 16.
19	Building Envelope	2,808,000 GCF	360' x 120 x 65'
20	Level II (65-125' level)	211,200 GSF-floor area	6 levels
21	Residential - NSF	179,520 NSF-floor area	6 levels, 85% efficiency ratio
22	Residential - Dwellings	211 Dwellings	assumes 850 sf per dwelling
23	Common/Other Area	31,680 NSF-floor area	Line 20 minus line 21.
24	Building Envelope	2,112,000 GCF	320' x 110 x 60'
25	Level III (125-300' level)	510,000 GSF-floor area	17 levels
26	Residential - NSF	433,500 NSF-floor area	17 levels, 85% efficiency ratio
27	Residential - Dwellings	510 Dwellings	assumes 850 sf per dwelling
28	Common/Other Area	76,500 NSF-floor area	Line 25 minus line 27.
29	Building Envelope	5,250,000 GCF	300' x 100 x 175'

Appendix E-2

Seattle Urban Form Study

DOC2- (400) Building Prototype Assumptions, EIS Alt. 1 High-end Density

line #	Element	Units	Notes
1	Gross Site Area	43,200 SF	assumes 360x120 ft. block
2	Net Site Area	43,200 SF	deducts ROW for alley and sidewalks
3	Building Height	300 Feet	per existing code
4	Air Space Envelope	12,960,000 CF	line 1 x line 3
5	Building Space Envelope	10,170,000 GCF	line 19 plus lines 24 & 29
6A	Air to Building Space Ratio	0.27 ratio	(line 4 minus line 5) divided by line 4
6B	Air Space Ratio Over Podium	0.38 ratio	(line 4 - line 19)/(line 5 - line 19) - 1
7A	Building Floor Area Ratio	29.64 Gross FAR	line 12 plus lines 20 & 25 & 30 / line 1
7B	Residential FAR (Net)	20.09 Net FAR	(line 8 * 850 sf/du) divided by line 1
7C	Residential Dwellings per Acre	1,030 Dwellings/Acre	(line 8 divided by line 2) * 43,560
8	Total Dwelling Units	1,021 Dwellings	line 17 plus lines 22 & 27 & 32
9	Total Commercial SF	18,360 NSF-floor area	line 13
10	Above Ground Parking	660 Spaces	line 15
11	Below Ground Parking	360 Spaces	assumes 3 levels (with 1 space/du)
12	Base Level (0- 65' level)	259,200 GSF-floor area	6 levels
13	Commercial - NSF	18,360 NSF-floor area	Ground Floor, 85% efficiency ratio
14	Parking Area - NSF	237,600 NSF-floor area	5.5 levels
15	Parking Spaces	660 Spaces	assumes 350 sf per parking space
16	Residential - NSF	- NSF-floor area	none
17	Residential - Dwellings	- Dwellings	none
18	Common/Other Area	3,240 NSF-floor area	Line 12 minus lines 13,14 and 16.
19	Building Envelope	2,808,000 GCF	360' x 120 x 65'
20	Level II (65-125' level)	211,200 GSF-floor area	6 levels
21	Residential - NSF	179,520 NSF-floor area	6 levels, 85% efficiency ratio
22	Residential - Dwellings	211 Dwellings	assumes 850 sf per dwelling
23	Common/Other Area	31,680 NSF-floor area	Line 20 minus line 21.
24	Building Envelope	2,112,000 GCF	320' x 110 x 60'
25	Level III (125-300' level)	510,000 GSF-floor area	17 levels
26	Residential - NSF	433,500 NSF-floor area	17 levels, 85% efficiency ratio
27	Residential - Dwellings	510 Dwellings	assumes 850 sf per dwelling
28	Common/Other Area	76,500 NSF-floor area	Line 25 minus line 26.
29	Building Envelope	5,250,000 GCF	300' x 100 x 175'
30	Level IV (300-400' level)	300,000 GSF-floor area	10 levels
31	Residential - NSF	255,000 NSF-floor area	10 levels, 85% efficiency ratio
32	Residential - Dwellings	300 Dwellings	assumes 850 sf per dwelling
33	Common/Other Area	45,000 NSF-floor area	Line 30 minus line 31.
34	Building Envelope	3,000,000 GCF	300' x 100 x 100'

Appendix E-3

Seattle Urban Form Study

DOC2- (450) Building Prototype Assumptions, High-end Height with Tower Sculpting Incentives

line #	Element		Units	Notes
1	Gross Site Area	43,200	SF	assumes 360x120 ft. block
2	Net Site Area	43,200	SF	deducts ROW for alley and sidewalks
3	Building Height	450	Feet	per existing code
4	Air Space Envelope	19,440,000	CF	line 1 x line 3
5	Building Space Envelope	11,206,000	GCF	line 19 plus lines 24 & 29
6A	Air to Building Space Ratio	0.73	ratio	(line 4 minus line 5) divided by line 4
6B	Air Space Ratio Over Podium	0.98	ratio	(line 4 - line 19)/(line 5 - line 19) - 1
7A	Building Floor Area Ratio	22.06	Gross FAR	line 12+lines 20, 25, 30, 35, 40, 45/line 1
7B	Residential FAR (Net)	17.16	Net FAR	(line 8 * 850 sf/du) divided by line 1
7C	Residential Dwellings per Acre	879	Dwellings/Acre	(line 8 divided by line 2) * 43,560
8	Total Dwelling Units	872	Dwellings	line 17 plus lines 22, 27, 32, 42, 47
9	Total Commercial SF	18,360	NSF-floor area	line 13
10	Above Ground Parking	540	Spaces	line 15
11	Below Ground Parking	360	Spaces	assumes 3 levels (with 0.9 space/du)
12	Base Level (0- 65' level)	259,200	GSF-floor area	6 levels
13	Commercial - NSF	18,360	NSF-floor area	Ground Floor, 85% efficiency ratio
14	Parking Area - NSF	194,400	NSF-floor area	5.5 levels
15	Parking Spaces	540	Spaces	assumes 350 sf per parking space
16	Residential - NSF	36,720	NSF-floor area	1 levels, 85% efficiency ratio
17	Residential - Dwellings	43	Dwellings	assumes 850 sf per dwelling
18	Common/Other Area	9,720	NSF-floor area	Line 12 minus lines 13,14 and 16.
19	Building Envelope	2,808,000	GCF	360' x 120 x 65'
20	Tower 1 Level A (65-125')	92,400	GSF-floor area	6 levels
21	Residential - NSF	78,540	NSF-floor area	6 levels, 85% efficiency ratio
22	Residential - Dwellings	92	Dwellings	assumes 850 sf per dwelling
23	Common/Other Area	13,860	NSF-floor area	Line 20 minus line 21.
24	Building Envelope	924,000	GCF	140' x 110 x 60'
25	Tower 1 Level B (125-300')	187,000	GSF-floor area	17 levels
26	Residential - NSF	158,950	NSF-floor area	17 levels, 85% efficiency ratio
27	Residential - Dwellings	187	Dwellings	assumes 850 sf per dwelling
28	Common/Other Area	28,050	NSF-floor area	Line 25 minus line 26.
29	Building Envelope	1,925,000	GCF	110' x 100 x 175'
30	Tower 1 Level C (300-450')	135,000	GSF-floor area	15 levels
31	Residential - NSF	114,750	NSF-floor area	15 levels, 85% efficiency ratio
32	Residential - Dwellings	135	Dwellings	assumes 850 sf per dwelling
33	Common/Other Area	20,250	NSF-floor area	Line 30 minus line 31.
34	Building Envelope	1,350,000	GCF	90' x 100 x 150'
35	Tower 2 Level A (65-125')	92,400	GSF-floor area	6 levels
36	Residential - NSF	78,540	NSF-floor area	6 levels, 85% efficiency ratio
37	Residential - Dwellings	92	Dwellings	assumes 850 sf per dwelling
38	Common/Other Area	13,860	NSF-floor area	Line 35 minus line 36.
39	Building Envelope	924,000	GCF	140' x 110 x 60'
40	Tower 2 Level B (125-300')	187,000	GSF-floor area	17 levels
41	Residential - NSF	158,950	NSF-floor area	17 levels, 85% efficiency ratio
42	Residential - Dwellings	187	Dwellings	assumes 850 sf per dwelling
43	Common/Other Area	28,050	NSF-floor area	Line 40 minus line 41.
44	Building Envelope	1,925,000	GCF	110' x 100 x 175'
45	Tower 2 Level C (300-450')	135,000	GSF-floor area	15 levels
46	Residential - NSF	114,750	NSF-floor area	15 levels, 85% efficiency ratio
47	Residential - Dwellings	135	Dwellings	assumes 850 sf per dwelling
48	Common/Other Area	20,250	NSF-floor area	Line 45 minus line 46.
49	Building Envelope	1,350,000	GCF	90' x 100 x 150'

Appendix D

Preferred Alternative Project List

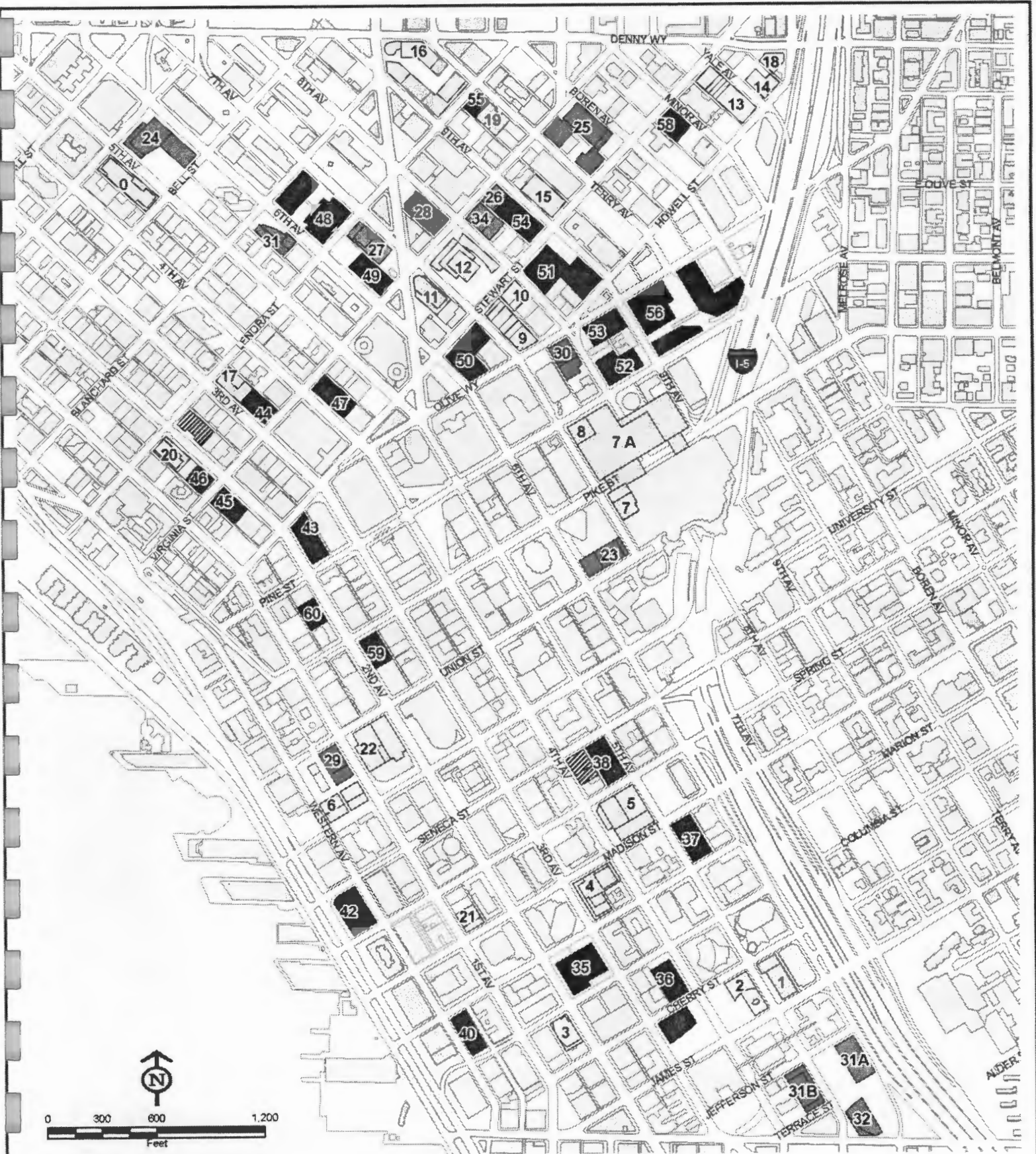
Table D
Preferred Alternative Project List for Potential Development
Accommodating 2000-2020 Growth

Project Name and Number	Project Type	Residential Units	Office Square Feet	Hotel Rooms	Employees
Projects Completed Since 2000 or Currently Under Construction					
1. Justice Center	Government	0	285,000	0	1,140
2. Municipal Building	Government	0	192,412	0	No net gain
3. Millennium Tower	Mixed use	19	196,000	0	784
4. IDX Tower	Office	0	846,600	0	3,386
5. Seattle Central Public Library	Public library	0	0	0	No net gain
6. Harbor Steps (final phase)	residential	285	0	0	
7. One Convention Place	office	0	288,000	0	1,152
7A. Convention Center Expansion					
8. Hyatt Elliott Hotel	hotel	0	300,000	400	400
9. 700 Olive Way	Office	0	525,900	0	2,104
10. Stewart House	residential	60	0	0	0
11. Metropolitan Tower	residential	346	0	0	0
12. Federal Courthouse	government				620
13. Metropolitan Park III	Office and athletic club and parking	0	130,000	0	520
14. Spring Hill Suites Marriott	hotel	0	0	234	0
15. 9 th & Stewart Life Sciences Building	Office/lab space	0	220,000	0	880
16. 2400 Westlake	Mixed use	270		126	126
17. YWCA Opportunity Place	Residential	145	0	0	0
18. 1811 Eastlake Supportive Housing	Special residence	75			
19. 2054 Terry Avenue	residential	54	0	0	0
20. Cristalla	Residential	186	0	0	0
21. Warshall's site	Mixed use	60	0	120	120
22. WAMU headquarters and SAM expansion	Office and museum	0	900,000	0	3,600
SUBTOTAL		1,500 units	3,883,912 SF	880 rooms	14,832 employees

Project Name and Number	Project Type	Residential Units	Office Square Feet	Hotel Rooms	Employees
Projects with approved permits or application in process					
23. Sheraton addition*	Hotel	0	330,000	400	400
24. 2300 5 th Avenue* (Frederick Cadillac site)	Office		592,000	0	2,368
25. Touchstone Stewart Place	Office	0	903,680	0	3,615
26. 819 Virginia*	residential	218	0	0	0
27. 2017 7 th Ave	Mixed use	329	464,520	0	1,858
28. 2001 8 th Ave (Touchstone)	Office	0	483,266		1,933
29. Four Seasons Hotel 1321 1 st Ave*	Mixed use		155,400		
30. 1635 8 th Ave*	Mixed use	170	380,000	340	340
31. 8 th & Blanchard	office	0	259,200	0	1,037
32. 500 5 th Avenue*	office	0	280,000	0	1,120
33. King Co. Admin Office west side 5 th Ave and Jefferson/Terrace Streets	government	0	356,034		1,424
34. 1918 8 th Ave	office	0	302,400		1,210
*Assumed project will not be revised under new provisions					
SUBTOTAL		717 units	4,506,500 SF	740 rooms	18,026 employees

Project Name and Number	Project Type	Residential Units	Office Square Feet	Hotel Rooms	Employees
Projected Development—Assumed Projects on Sites Likely to be Redeveloped					
35. Seattle Trust Court site	office	0	1,044,480	0	4,178
36. 4 th Ave/Columbia and Cherry	office	0	485,520	0	1,942
37. College Club site	office	0	489,600	0	1,958
38. Olympic Garage site	office	0	489,600	0	1,958
39. Society Candy site	residential	304	0	0	304
42. Western/Seneca and Spring	Mixed use	108	248,500	0	994
43. Avalon Hotel site	Mixed use	170	190,854	189	189
44. 3 rd and Virginia	Residential	387			
45. SW corner 2 nd & Virginia	Residential	387	0	0	0
46. NW corner 2 nd & Virginia	Residential	350	0	0	0
47. 4 th Ave @ Virginia	Mixed use	388	362,880	0	0
48. 6 th /7 th Aves & Lenora/Blanchard	office	0	1,169,280	0	4,677
49. 6 th Ave and Virginia/Lenora	Office		544,320	0	2,177
50. Vance properties	Mixed use	317	534,464	700	700
51. Greyhound Bus Terminal site	Mixed use	608	1,059,000	0	4,236
52. Camlin block-south	Office	0	599,200	0	2,397
53. Camlin block-north	Mixed use	376	401,296	0	1,605
54. 9 th and Stewart (NW corner)	Office	0	441,840	0	520
55. Terry and Lenora (SW corner)	Residential	273	0	0	0
56. King Co. Convention Place TOD site	Mixed use	900	600,000 office 400,000 hotel	800	3,200
57. Public Safety Bldg site	Office/open space	0	380,000	0	1,520
58. Minor and Stewart	Residential	265	0	0	0
59. 2 nd and Pike 1400 blk	Residential	387			
60. 2 nd and Pike 1500 blk	Residential	387			
SUB TOTAL		5,607	9,648,434	1,689	32,555
Projected 2000 – 2020 TOTAL		7,824 units	17,831,246 SF	3,309 rooms	65,413 employees

320,760



Preferred Alternative Building Sites and Identification Numbers

Legend

	Existing Buildings		New (since 2000)/Under Construction
	Built 1993-2000		Currently Permitted/Proposed
	Potential		

DISTRIBUTION LIST

Federal

U.S. Environmental Protection Agency
U.S. Army Corps of Engineers

U.S. Fish & Wildlife Service
H.U.D.

State

Washington Department of Ecology
Washington Office of Community
Development
Washington Department of Transportation
Washington Department of Fish & Wildlife

Washington Department of Natural
Resources
Washington Department of Social & Health
Services
Washington Office of Archaeology and
Historic Preservation

County

King County Metro
King County Department of Transportation
King County Housing & Community
Development
King County Office of Regional Policy and
Planning

King County Department of Development
and Environmental Services
King County Executive
King County Assessor

City

Departments of Fire, Police, Neighborhoods,
Departments of Human Services, Parks,
Department of Transportation
Seattle Public Utilities
Seattle Public Schools

Office of Housing
City Light
Seattle Public Libraries
Planning Commission
City Council

Other Government Entities

Port of Seattle
Monorail Authority
Public Facility District
Public Stadium Authority

Puget Sound Regional Council
Puget Sound Clean Air Agency
Sound Transit
Seattle-King County Housing Authority

Tribes

Muckleshoot
Suquamish
Duwamish

United Indians of All Tribes
Tulalip