

AURORA LICTON URBAN VILLAGE

April 7, 2016

Mr. Geoff Wentlandt, Senior Planner
City of Seattle
Suite 2000
P.O. Box 34019
Seattle, Washington 98124-4019

SENT VIA EMAIL: geoffrey.wentlandt@seattle.gov

SUBJECT: Design Review - Program Improvements for Public Review

Dear Mr. Wentlandt:

The Aurora Licton Urban Village (ALUV) appreciates the opportunity to comment on the Seattle Department of Construction and Inspections (SDCI) recommended Design Review Program Improvements dated March 2016.

As background, ALUV consists of neighbors, community groups and business owners who reside or work in and near the Aurora Licton Residential Urban Village. Our goal is to actively coordinate with community members, organizations, the City of Seattle and others to successfully implement the vision of the City of Seattle's adopted Aurora Licton Neighborhood Plan (March 1999).

ALUV's Mission Statement is as follows:

"Build a pedestrian-safe, visually vibrant, economically sound, livable and welcoming neighborhood using sustainable-growth principles."

Our comments on the draft Design Review Program Improvements are in keeping with this Mission Statement. General comments are provided first, followed by comments specific to the five (5) SDCI recommendations.

GENERAL COMMENTS

- Unlike many other City of Seattle neighborhoods and urban villages, the Aurora Licton Residential Urban Village **does not** have adopted neighborhood design guidelines. This is in spite of a Policy and a Recommended Action from the 1999

Aurora Licton Neighborhood Plan that design guidelines be prepared for the Aurora Licton Residential Urban Village.

We mention this because certain design improvement recommendations streamline the design review process. We are concerned about recommendations that streamline the design review process in urban villages that do not have neighborhood design guidelines.

Neighborhood design guidelines are the mechanism to ensure that a project's design, regardless of the process used to review the project, reflect neighborhood values and mitigate density impacts. Neighborhood design guidelines provide direction to staff, developers and others so that new development fits seamlessly into the neighborhood. Therefore, certain design recommendations should not be implemented in urban villages or centers unless it (the urban village or center) has adopted neighborhood design guidelines.

- Until such time design guidelines are adopted for the Aurora-Licton Residential Urban Village, what would be helpful is if the City held a design charrette with visual preference surveys of current urban village architectural styles. This would include public involvement to review the current building inventory and feedback on what the public finds as desirable and undesirable design. This can then be memorialized for use by City staff and Design Review Board until such time neighborhood design guidelines are adopted.
- Workload appears to be driving certain Design Review Program Improvements. We understand the concern over delay in reviewing projects. However, rather than streamline the process, the City needs to fund adequate staffing levels to address the existing workload. Thorough design review of development applications, which may involve buildings that will exist and impact a neighborhood for several decades or more, should not be streamlined due to workload considerations when other alternatives exist.
- The "Additional details to consider" associated with each recommendation are just as important as the recommendation itself. Certain recommendations cannot be successful unless these "Additional details to consider" are appropriately implemented. The "Additional details to consider" need further discussion and need to be more specific before the Design Review Improvement Recommendations are forwarded to the Mayor and/or City Council.

SPECIFIC COMMENTS (ON RECOMMENDATIONS)

With respect to the five (5) specific recommendations, please consider the following:

RECOMMENDATION #1 (Early and Ongoing Engagement)

We strongly support requiring an applicant to conduct outreach with the neighborhood prior to submittal of a design review application to the City.

However, a bullet statement in the recommended process improvements (Page 15 under item 3 “EDG”) states that the applicant provide at the EDG stage,

“Evidence of in-person meeting(s) or outreach.”

The “or” statement leaves open whether applicant outreach will require an “in-person public meeting”. An “in-person public meeting” should be a **minimum** requirement. It is only through a public meeting that adequate give and take and question and answer dialogue between the public and applicant can take place. Public meetings allow the public to obtain a better understanding of the proposal and facilitate productive discussion on design options relative to other public outreach methods. This recommendation should be revised to require a public meeting. Preferably, such meeting should occur in the same neighborhood as the project itself.

As mentioned under General Comments above, many items under “Additional details to consider” (Page 15) are essential to the successful implementation of this recommendation. For example, if the City does want to encourage residents to comment on development proposals, then the City should directly support communication efforts by those groups and organizations that frequently interact and inform the neighborhood.

RECOMMENDATION # 2 (Set Design Review Thresholds Based on Project Characteristics and Do More Administrative Reviews)

As noted in General Comments, addressing the volume of applications straining the design review program should not necessarily be accomplished solely by reducing design thresholds to allow fewer development proposals to proceed through certain design review processes.

The higher volume of design review proposals may very well be a function of a strong economy. This should be addressed through increased resources and not by reducing the criteria for projects required to proceed through Design Review.

If the proposed “Hybrid Design Review” process is implemented, then the Design Review Board should have the last review of the proposal (at the recommendation

stage), after the proposal has proceeded through early public outreach and staff review (at the EDG stage).

Design Review Boards have a greater level of design expertise than staff, especially regarding design feasibility and alternatives. Design Review Board involvement best occurs at the latter end of the process where a proposal has been more fully developed, alternatives can be explained, and a final recommendation is made. The Design Review Board public meeting process is also much more transparent and accountable to the public than staff review.

Also, the proposed thresholds directing development applications to different design review processes needs reevaluation. For instance, the complexity or lack of complexity of a development proposal is not necessarily a function of whether the proposal is located in an urban village, its square footage or site footprint.

In fact, more complex design challenges are often presented by smaller infill projects on small lots in urban villages. Compatibility with neighboring properties is often more complex and more difficult to achieve in such instances. Smaller projects often have less room for design creativity that could mitigate impacts on surrounding land uses. These infill projects therefore need to be carefully evaluated through the design review process allowing for the greatest degree of public involvement as possible.

Additionally, if urban villages or centers are used as a category for whether or not a proposal might be “Less Complex” or “More Complex”, then it should only be applied where an urban village or center has adopted neighborhood design guidelines. In other words, urban villages or centers without neighborhood design guidelines should always be considered a “More Complex” project, at least until such time neighborhood design guidelines are adopted.

Overall, Recommendation #2 requires re-examination with additional time for the public to review and comment.

RECOMMENDATION #3 (New Tools and Techniques)

We would support all tools intended to make the design review process more accessible and understandable to the general public.

Further, significant training in architecture and urban design should be provided to all staff members if staff is to assume a greater role in design review. Staff should also meet collectively to review design review applications, otherwise there may be inconsistent application of design guidelines depending upon which staff member is assigned to a project.

Where feasible, consideration should be given to holding Design Review Board meetings within the urban village or center (if applicable) where a proposed project is located. Improved accessibility would encourage meeting attendance and public input from those directly affected.

As an additional item for consideration, the City should provide an informational moderated video on the City of Seattle design review website that explains how the design process works, what takes place at a Design Review Board meetings and how citizens can effectively comment prior to and/or at a Design Review Board meeting.

RECOMMENDATION #4 (Changes to Board Composition and Structure)

The expansion of a board size from five (5) to seven (7) members is not a significant concern.

In doing so, however, we would encourage that one of the community representative positions of an expanded Board be dedicated to an individual who resides and/or works in the urban village or neighborhood planning area where the proposal is located (assuming the proposal is within the boundaries of an urban village or neighborhood planning area). This would facilitate Recommendation #1 by having an urban village/neighborhood perspective on the Board who can bring greater day to day familiarity with the site, its issues and neighborhood context.

RECOMMENDATION #5 (Updates to Design Review Thresholds)

See comments under Recommendation #2.

OTHER COMMENTS

In addition to the comments above, we offer the following additional comments on the City's Design Review process.

- In at least one Design Review Board case earlier this year, the applicant's materials were not available on the City of Seattle Public Resource Center (PRC) website until five calendar days prior to the meeting. Three of those five days were the New Year's Day weekend.

A letter requesting additional review time was submitted and posted on the PRC web site in advance of the Design Review Board meeting; however, an extension of time for public comment was not granted. Circumstances like this should not happen.

- Discontinue a practice of City staff summarizing comments from comment letters submitted to the Design Review Board. The Design Review Board

should get the full text of letters submitted by the public so there is no misinterpretation or screening of a comment letter's content.

- Lastly, as much as the City emphasizes “use” is not a design issue, land use does drive characteristics of the building. By way of example, there are two separate mini-warehouse proposals - one four story and other six story - within four blocks of one another on Aurora Avenue. Mini-warehouses are auto-oriented uses and are designed as such.

Mini-warehouses do not provide the vibrant pedestrian oriented neighborhood serving goods and services an urban village needs. The Aurora-Licton Urban Village is losing key properties to buildings facilitating automobile oriented design rather than to neighborhood serving development. The City needs to take actions such as zone changes and pedestrian overlays in the Aurora-Licton Urban Village to generate more business diversity and pedestrian oriented uses and building design that better meets the intent of an urban village.

Finally, this letter emphasized at the outset the need for neighborhood design guidelines in the Aurora Licton Residential Urban Village. Neighborhood design guidelines provide direction to Design Review Boards and provide greater certainty and predictability to the public and developers as to what the neighborhood expects from development. Ideally this should make permitting more predictable.

Recently, a developer of a project in the Aurora Licton Residential Urban Village committed, *up to a three year period*, a minimum of \$3,000 that may go towards a grant match for the development of neighborhood design guidelines for the Aurora-Licton Residential Urban Village. The commitment was made in December 2015.

We bring this to your attention to illustrate both the importance of neighborhood design guidelines to the Aurora-Licton Springs Residential Urban Village as well as the three year timeline within which these funds may be accessed for this purpose. We would appreciate your efforts to identify and secure City funding for this very important need in the Aurora-Licton Springs Residential Urban Village and surrounding area.

Thank you for the opportunity to comment and for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink that reads "David Osaki". The signature is written in a cursive, slightly slanted style.

David Osaki

Aurora Licton Urban Village

cc: Lisa Rutzick, Design Review Program Manager, City of Seattle
lisa.rutzick@seattle.gov