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MEMORANDUM

To: Kurt Triplett, City Manager

From: Adam Weinstein, AICP, Planning & Building Director
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Date: September 8, 2022

Subject: NE 85TH ST STATION AREA PLAN – PHASE 2 – FILE NO. CAM20-00153

STAFF RECOMMENDATION

Receive a briefing on the remaining Station Area Plan planning process, including a summary of the decisions made and work completed in Phase 1, and an overview of Phase 2 deliverables and schedule. Review a summary background of the economic analysis completed to inform the incentive zoning program included in the Station Area Form-based Code (FBC) and provide staff with policy direction on affordable housing choices and incentive zoning program options that should be drafted for the Phase 2 FBC regulating districts.

BACKGROUND & PHASE 1 ADOPTION REVIEW

The City began the planning process on the Station Area Plan in 2019. With input from the community, and elected and appointed officials, several planning phases of the project have been completed. The City completed work in the first half of 2022 that focused on the legislative process to adopt the first phase Station Area Plan deliverables (Phase 1). This legislative work was originally scheduled to occur in 2021, with adoption projected by June 2021. That planned adoption was extended by over a year to allow for additional due diligence requested by Council, including supplemental transportation analysis, a Fiscal Impacts and Community Benefits Analysis, and more community feedback. Legislative work in 2022 has been divided into two phases to ensure adequate time for the community and appointed/elected officials to consider important community benefits and urban design components for each phase.

Phase 1 Adoption

Following a June 9, 2022 Planning Commission public hearing, City Council considered community input and the Planning Commission's recommendation, deliberated, and adopted a plan for the NE 85th Street Station Area at a special meeting on June 28, 2022. The adoption of the plan, along with related Comprehensive Plan and Municipal Code amendments, paves the way for a thriving, transit-oriented, new walkable district with high tech and family wage jobs, plentiful affordable housing, sustainable buildings, park amenities, and commercial and retail services. At the June 28 meeting, Council also adopted the first phase of Station Area Zoning Code amendments which implement a FBC for the Commercial Mixed-use District: the district

within the Station Area that is nearest to the future Sound Transit Stride Bus Rapid Transit (BRT) station in the I-405 interchange that will allow for the densest commercial and/or institutional development.

A summary of the resolution and ordinances that adopted Phase 1 deliverables and legislative amendments, and catalyst project implementation, are shown below. The final versions of the adopted documents are available on the [Station Area Plan project webpage](#), and the adopted ordinances are hyperlinked.

- [*Resolution R-5547: Station Area Plan*](#)
The final plan document includes Vision and Goals for: Land Use and Urban Design, Open Space, Transportation and Mobility, and Sustainability. The document includes a summary of the entire planning process, including an executive summary, overview of the planning process, and plan recommendations.
- [*Ordinance O-4800: Comprehensive Plan Amendments*](#)
The Comprehensive Plan amendments encompassed the entire Station Area Plan, which includes a new subarea chapter (XV.G) for the district that establishes the vision, goals, and policies for future growth. This new chapter overlays portions of the six neighborhoods that comprise the geography of the Station Area but does not alter any existing neighborhood boundaries.
- [*Ordinance O-4801: Zoning Map Amendments*](#)
The Phase 1 Zoning Map amendments included legislative rezones of 15 parcels from North Rose Hill Business District (RH 1A, 2A, and 2C) to Commercial Mixed Use (CMU), one parcel from Professional Office (PO) to CMU, and one parcel from Professional Office/Residential 3.6 (PR 3.6) to CMU.
- [*Ordinance O-4802: Kirkland Zoning Code \(KZC\) Amendments*](#)
The Zoning Code amendments included a new chapter for the Station Area FBC (KZC 57), and a number of consistency edits in various chapters to apply the parcel rezones, incorporate references to the new Station Area zone, and remove references to the zones being repealed. The amendments for Phase 1 of Station Area adoption were for implementation of the Commercial Mixed-use zone only; the remainder of the Station Area zones will be considered in Phase 2.
- [*Ordinance O-4803: Kirkland Municipal Code \(KMC\) Amendments*](#)
The amendments were made to KMC 3.30, which is the section of the Municipal Code that houses the City’s Design Guidelines. The Station Area Design Guidelines replaced the existing Rose Hill Business District Guidelines. While the FBC established standards for streets, the relationship of buildings to streets, and specific massing limitations for development, the design guidelines will be used to provide general guidance for massing, articulation, and materials of buildings.
- [*Catalyst Development Implementation*](#)
Council adopted a development agreement with Google through [Ordinance O-4807](#) on July 19, 2022. The development agreement process, as established by RCW 36.70B.170, required a public hearing before the agreement was approved by ordinance. The agreement contains terms negotiated by the City and Google that give Google the certainty it needs to make a purchase decision while

ensuring that development of a catalyst project by Google would meet or exceed the outcomes intended by the requirements in the adopted Form Based Code for the Station Area. Additionally, Council adopted a Planned Action Ordinance for the Google campus development through [Ordinance O-4809](#) on September 6, 2022.

The decisions made for the Station Area Plan, and the Comprehensive Plan and Municipal Code amendments encompassed the policy direction necessary to guide both phases of Zoning Code and Map amendments in the Station Area. As this policy direction has already been considered and discussed in context of the entire Station Area Plan, it will not be a direct subject of discussions with the community, or the Planning Commission and Council, in Phase 2; this phase will not include any amendments to the adopted Station Area Plan, Comprehensive Plan, or Municipal Code.

PHASE 2 OVERVIEW

Phase 2 of the Station Area adoption process will include specific parcel rezones and Zoning Code amendments to implement the FBC for the Neighborhood Mixed-use, Civic Mixed-use, Neighborhood Residential, and Urban Flex districts.

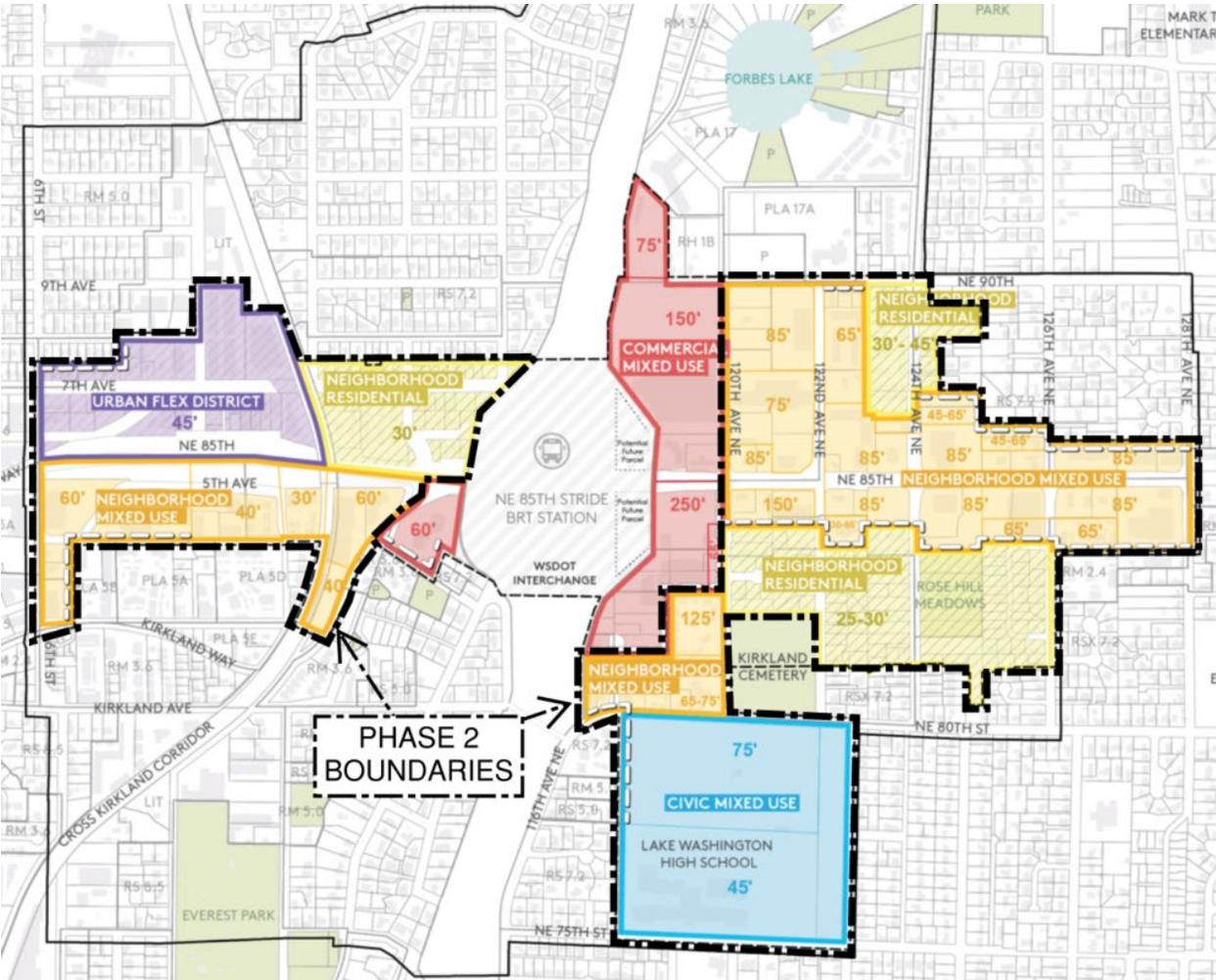


Figure 1: Station Area Zones

Phase 2: New FBC Standards (to be drafted in Phase 2)

The Phase 2 Zoning Code amendments will add the following FBC sections to the adopted Station Area chapter (KZC 57) for each individual regulating district:

Regulating Plan

The regulating plan shows the application of the zone to specific parcels, and the allowed base height and maximum bonus height (where applicable) that can be achieved by providing community benefits.

Permitted Uses

The FBC employs general use categories to regulate permitted uses in the district. These use categories are intended to be more flexible than in conventional zoning districts in order

to encourage the creation of a vibrant, mixed-use neighborhood where housing, shops, and services can be accessed without a car.

Regulating District Standards

The regulating district (i.e., Station Area zones, see Figure 1) will set forth standards for the following:

- Lot coverage
- Required yards
- Base maximum allowed height
- Bonus maximum allowed height
- Maximum floor plate(s) per building
- Upper story street setbacks
- Tower separation
- Maximum façade widths and modulation minimums



Figure 2: FBC exhibit, prepared by Mithun

Parking

The FBC will establish vehicle and bike parking standards for the uses that were not included in Phase 1 amendments.

Phase 2: Adopted FBC Standards Applicable to Phase 2 Districts (adopted in Phase 1)

Portions of the Station Area FBC (KZC 57) that apply to all regulating districts were adopted with Phase 1 in order to fully implement zoning for the Commercial Mixed-use district. The following is an outline of FBC sections that were already adopted in Phase 1 and will also apply to the Phase 2 regulating districts. Note that Phase 2 legislative amendments are likely to include minor amendments to adopted district-wide standards for clarity and ease of use.

Frontage Types and Standards

The frontage types establish a foundation for how the FBC regulates how building types interact with the public realm (i.e., streets, pedestrian ways, plazas, and other public spaces). For each frontage type, the FBC sets forth standards for the following:

- Ground floor design (minimum height, façade transparency, façade widths and entry standards)
- Minimum and maximum front setbacks
- Amenity zone allowances
- Corner design requirements
- Ground floor parking setbacks

Street Types and Standards

Street types in the FBC are informed by the specific transportation network improvement concepts developed through the transportation analysis for the district. The FBC establishes typical minimum (unless noted) widths for the following components of the street:

- Pedestrian clear zone
- Bikeway
- Furnishing zone (i.e., area for street furniture)
- Maximum travel lane width
- Number of travel lanes (typical)

Transitions

The FBC establishes required transitions that are intended to ensure that new development is consistent with the vision of the NE 85th Street Station Area Plan to provide appropriate transitions of development intensity, height, and bulk across zones of varying height. These transition standards may be evaluated with the Phase 2 work to ensure they apply appropriately to the Phase 2 regulating districts.

Incentive Zoning Program

Phase 1 adoption of KZC 57 created an incentive zoning program that was specific to the Commercial Mixed-use District, which is unique in the Station Area as the only district anticipated to prohibit residential uses. The Commercial Mixed-use district regulating map established allowed base heights (allowed by-right) and required performance standards for all development at or below the base height. The new base heights reflect an adjustment above current zoning (pre-Station Area) as a way to offset the cost of new base requirements (i.e., high performance buildings, green factor, and transportation and other infrastructure improvement requirements). The incentive zoning program, where applicable, allows additional development capacity above the new base height, up to the maximum allowed heights identified for the regulating district, if development provides additional community benefits. The benefits required to utilize the incentivized development capacity are beyond the new established baseline development requirements in the Zoning Code.

The incentive zoning section in the FBC includes a table of the available amenity categories an applicant may choose to provide to access incentive capacity, organized by key community benefit topics. The section also sets forth an “exchange rate” for each amenity that will

regulate how much incentive capacity may be awarded to the applicant for each unit of community benefit amenity provided. Because the incentive zoning program can be structured to prioritize achieving certain community benefits through the program over others, Council had a robust discussion in Phase 1 about the desired structure for the Commercial Mixed-use District, and the below section sets forth questions for Council to affirm the policy direction to build the program structure for the Phase 2 districts.

Station Area Planned Action Ordinance

Phase 2 of the Station Area planning process will also include adoption of the final Planned Action Ordinance (PAO) for the full Station Area, minus the sub-area covered by the PAO recently adopted for the Google catalyst project at the Lee Johnson site. The PAO is the culmination of the environmental review process under the State Environmental Policy Act (SEPA) and will include specific mitigation measures for future development and submittal requirements for development applications to be reviewed as planned actions. Planned actions will be those projects that do not exceed thresholds established in the PAO (e.g., activity units, vehicle trips), and are therefore not required to perform environmental review beyond that in the Final SEIS for the Station Area. The purpose of the PAO is to streamline the environmental review of future public and private development projects that help promote the vision of the Station Area Plan.

One benefit of a PAO is that it can provide certainty for future development applicants about the specific infrastructure projects they are required to build with their project, and/or how they may be required to contribute to infrastructure projects that provide system-wide capacity. The project team is currently coordinating with the Finance and Public Works Departments to incorporate the infrastructure projects associated with the Station Area Plan into the City's Capital Improvement Program (CIP). Later this year, the City's Capital Facilities Plan Chapter of the Comprehensive Plan will be updated to ensure the CFP includes SAP system improvements and projects in the CIP. In an adjustment to the Phase 1 deliverables earlier this year, staff recommended that the adoption of the PAO be delayed until the CIP reconciliation is complete to be sure that the PAO and impact fees are aligned in establishing appropriate development fees and project mitigations (expected to occur before the end of this year) and aligned with adoption of the other Phase 2 deliverables.

REQUEST FOR COUNCIL POLICY DIRECTION: AFFORDABLE HOUSING & PHASE 2 INCENTIVE ZONING STRUCTURE

A focus of the Station Area planning process has been to maximize benefits to the community as new development occurs in the district. Along with the inherent benefit of creating the opportunity for more housing and jobs near high-capacity transit, and concentrating complementary uses in a walkable, connected neighborhood, the FBC uses the strategy of an incentive zoning program to encourage community benefit provision from private development in the following categories: Affordable Housing, Mobility, Open Space and Parks, Sustainability, and Schools. Because the increase in development capacity varies across the proposed rezones in the study area, not all regulating districts will have an incentive zoning program. A brief analysis from the City's consultant, Habile, is enclosed as Attachment 1 to this memo and provides a summary review of the economic analysis completed with Phase 1 work along with economic considerations for Phase 2. That background sets the parameters for calibration of

the Phase 2 incentive zoning program and will be used to guide discussions around policy choices.

Summary of Phase 1 Incentive Zoning Structure and Previous Council Direction

At the June 21 Council Study Session, prior to adoption of the Phase 1 FBC, Council discussed the options for the incentive zoning structure that was initially discussed at its [June 7 study session](#). Council agreed that affordable housing should be the first and foremost priority for community benefits provision through the incentive zoning program in the Station Area. However, Council drew a distinction between the program structure under consideration for the Commercial Mixed Use (CMU) district (Phase 1) where the affordable housing amenities provided would be in the form of a monetary contribution and not performance-based (because residential uses are not allowed in the CMU district), and the program structure that might apply to the remainder of the Station Area districts where residential uses will be allowed (Phase 2). Council also discussed that the program should be structured such that a variety of community benefit amenities are provided by individual developments, i.e., that a development should not be permitted to receive its full amount of requested incentive capacity by providing amenities in only one category (e.g., Sustainability). Council expressed a consensus opinion that a non-tiered and policy-weighted structure was preferred as a base and requested that staff provide options within that structure that address the above concerns. Below are the two final options for the program structure that were presented to Council prior to adoption of the FBC, both which provided an option aligned with a top strategy in the City's [Housing Strategy Plan](#) to link affordable housing payments to increases in development capacity for commercial projects.

Option 3A (Selected for Phase 1 – CMU District): Policy-weighted, variety of amenities required. An applicant must provide incentive amenities from at least two different categories in KZC 57, Table 5, in order to receive their requested incentive capacity. No more than 75% of the requested incentive capacity may be achieved through provision of amenities in a single category; amenities must be provided from at least two categories. Applicants may choose to provide amenities from more than two amenity categories. Includes a provision for the Planning Director to grant a modification to the above requirement if a modification provides a landmark community benefit in the chosen amenity category such that the benefit is superior to what could be provided through the required diversification of amenities, and/or if site constraints make compliance infeasible.

Option 3B (Not selected for Phase 1): Policy-weighted, housing required. An applicant must provide incentive amenities from at least two different categories in Table 5 in order to receive their requested incentive capacity. No more than 75% of the requested incentive capacity may be achieved through provision of amenities in a single category, and at least one of the provided amenities must be in the Affordable Housing category.

At the time of Phase 1 adoption, Council indicated that a structure similar to Option 3B may be appropriate for districts within the Station Area that will allow residential uses.

Phase 2 Incentive Zoning Program

Phase 2 of the Station Area adoption process will consider development regulations for the Neighborhood Mixed-use, Civic Mixed-use, Neighborhood Residential, and Urban Flex districts

(see Figure 1, Station Area zones). These are distinct from the Phase 1 district (CMU) for several reasons including, but not limited to, the following:

- Allowed Uses: Phase 2 districts will allow residential uses that are prohibited in the CMU district;
- Development Capacity: Phase 2 districts, though adding development capacity beyond current allowances, will generally be less intensive and have lower heights than the CMU district. Because the increase to development capacity with Station Area zoning in Phase 2 districts will be less than the increase adopted in the CMU district, the feasible capacity for new development to provide community benefits (beyond new base requirements) through an incentive zoning program will be less than that on CMU properties; and,
- Specific Character of Districts: the Civic Mixed-use district that encompasses Lake Washington High School, and the Urban Flex district including portions of the Norkirk light industrial area both include properties with existing uses that are expected to continue. In the Neighborhood Residential and Urban Flex District, the proposed change to development capacity (i.e., allowed maximum height) is minimal (and on many properties no increase to allowed height is proposed).

The above factors limit the feasible application of an incentive zoning program in the Civic-Mixed Use, Neighborhood Residential, and Urban Flex districts, though it is important to note that changes to base requirements in these districts can result in benefits to the community. Thus, the focus of the incentive zoning program consideration in Phase 2 will be on the Neighborhood Mixed-use district.

Policy Questions for Council

In order to complete a draft of the FBC, including the incentive zoning program, for the Phase 2 Station Area regulating districts, staff is requesting that Council provide feedback on the below questions. It should be noted that part of the formation of the incentive zoning program also includes calibration of the base requirements (i.e., standard requirements applicable to new development, whether utilizing only the allowed base height or the allowed bonus height). As such, some direction requested relates to both potential base requirement and the incentive program structure.

1. A top strategy in the City's Housing Strategy Plan is create City incentives in exchange for providing affordable housing. Does Council confirm that affordable housing should be the priority for Phase 2 Zoning?
2. The Housing Strategy Plan identifies a top strategy to increase overall housing and choices in Transit Oriented Development (TOD) and other centers. Considering this, what should the priority be among affordable housing options in the Station Area?
 - *Option 1: Providing units at deeper levels of affordability (staff understands this is an ARCH priority among the options list)*
 - *Option 2: Providing more affordable units at current affordability level (e.g., increasing inclusionary requirement for new development above 10%)*
 - *Option 3: Providing affordable units with higher bedroom counts (2+) that would be suitable for families and larger households*

3. Should the code focus on encouraging production of affordable housing units in the Station Area over other uses (i.e., a structure that incentivizes residential development more than commercial)?
4. Affordable housing production can be focused into the BASE requirements, or into INCENTIVE requirements (e.g., affordable housing amenities required to access development capacity above base height). Does Council prefer either option at this point, or is it preferred to select the option that provides the most units?

The project team will be completing additional economic analysis to inform future discussions on this question and at this time initial direction is sought to guide that analysis.

5. Are there other community benefit categories (Mobility, Open Space and Parks, Sustainability, or Schools) that should be prioritized in Phase 2?

NEXT STEPS

With the Council direction provided, staff will complete a draft of the Phase 2 FBC, including options for the incentive zoning program and any dependent adjustments to base requirements, and the Planned Action Ordinance. The following is the tentative Phase 2 schedule:

- September 22, 2022: Planning Commission meeting – Phase 2 overview
- October 2022: Planning Commission study sessions – draft FBC
- October 2022: Community workshop to familiarize the public with the draft FBC, and receive input for the Planning Commission and Council
- November 2022 (tentative): Planning Commission public hearing on Zoning Code amendments (Phase 2 FBC)
- November 2022 (tentative): City Council public hearing – Planned Action Ordinance
- December 2022 (tentative): City Council consideration of Phase 2 adoption (FBC and PAO)

The tentative schedule will be flexible to allow for Planning Commission and/or Council to request additional meetings to study or consider the Phase 2 deliverables.

ATTACHMENTS

1. Phase 2 Economic Considerations Memorandum, prepared by Habile, dated September 7, 2022

ECONOMIC ANALYSIS IMPLICATIONS OF PROPOSED FBC

A key challenge of adding an incentive program as part of implementing proposed land use regulations is to assess how the changes in development capacity and requirements are likely to affect the development economics in the NE 85th Street Station Area. Land values in the area are a function of the current zoning, physical constraints on development and market conditions, and any significant changes to the zoning parameters will influence future land values.

To inform Council deliberations, economic analysis was conducted during Phase 1 on the total potential value of the upzone in all designating districts and how that value might be divided between base zoning and potential incentive zoning. This was a necessary step in the process to determine the degree to which new base (as-of-right) development requirements being considered for the Station Area might increase the cost and/or risk of development. Since these requirements are mandatory and apply to most, if not all, future permit applications, any significant cost impacts would likely impact the development economics in the station area, which in turn could materially impact the success of the Station Area Plan.

To mitigate these potential market and implementation risks, the new or incremental development requirements were reviewed to assess potential cost impacts to and identify how best to mitigate them. Working with City staff and the Station Area Planning team, three specific development requirements were identified that warranted additional review, including: (1) recently adopted High Performance Building Code; (2) a proposed threshold Green Factor Score which new projects would need to exceed; and, (3) requiring new development in the station area to fund the incremental infrastructure requirements to support the greater density.

The table to the right shows the resulting suggested base heights for the Phase 1 and Phase 2 zones.

- Base height would increase in most current properties.
- Where base height increases are marginal or not proposed, the reduced parking ratios provide the additional value to address new requirements.
- Among the designating districts:
 - Incentive capacity in the CMU district is concentrated in the CMU-150 & CMU 250 zones east of I-405.
 - There are a wide range of zoning pairs in the NMU district that could potentially support a functional incentive zoning (IZ) program
 - There is insufficient upzone capacity for IZ in Urban Flex or Neighborhood Residential Districts
- For consistency and simplicity, it was determined that a minimum of 20 feet of height would be needed beyond the new standardized base maximum to support a functional incentive system. As a result, in three of the CMU zones and one NMU zone, the new base height would be equal to the proposed maximum height.

| FBC Zone Designation | Current Max Height | New Base & Max Heights | | |
|-------------------------|--------------------|------------------------|------------|---------------------------|
| | | Base Height | Max Height | Total IZ Height Available |
| Phase 1 Adoption | | | | |
| CMU-250 | 30-67 | 85 | 250 | 165 |
| CMU-150 | 67 | 85 | 150 | 65 |
| CMU-75 | 35 | 75 | 75 | 0 |
| CMU-65 | 55-67 | 65 | 65 | 0 |
| CMU-60 | 30 | 60 | 60 | 0 |
| Phase 2 Adoption | | | | |
| NMU-150 | 35 | 40 | 150 | 110 |
| NMU-125 | 30 | 40 | 125 | 85 |
| NMU-85 | 30-65 | 40 | 85 | 45 |
| NMU-75 | 30-65 | 40 | 75 | 35 |
| NMU-65 | 30-35 | 40 | 65 | 25 |
| NMU-60 | 30-35 | 40 | 60 | 20 |
| NMU-40 | 30-40 | 40 | 40 | 0 |
| UF-45 | 30-45 | 45 | 45 | 0 |

The map in Attachment A graphically depicts where a functional IZ program would likely be an option, with most of the CMU and NMU zones east of I-405 offering the best opportunities. However, on the west side of I-405, the additional capacity from the upzone would be consumed by the increased base height.

ECONOMIC ANALYSIS IMPLICATIONS OF PHASE 2 CHOICES

Economic considerations and issues related to Phase 2 implementation:

- 1) **Residential uses allowed.** The single biggest change relative to Phase 1 is that residential uses are permitted in all the remaining designating districts in addition to commercial uses. This introduces several new policy issues and choices that will have economic implications, including:
 - a) **Competition among principal uses.** The most significant new economic variable that must be considered in Phase 2 is the fact that property owners and developers will have a choice to build commercial, residential, or mixed-use projects. As a result, the specific base and incentive zoning parameters could affect the relative competitiveness of these project types which are effectively competing for the same development sites.
 - b) **Affordable housing requirements.** Allowing residential uses presents new opportunities to use the zoning code to influence the provision of affordable housing in the city. The code currently has a 10% inclusionary requirement, which is reflected in the development economics for residential projects in Kirkland. Changes in affordability requirements could materially affect the market for new residential development. Three considerations for new affordable housing incentives/requirements are presented below.
 - i) **Consider changes to base requirements.** One option may be to change the base requirements of new residential development. Such a change would likely require a reconsideration of the base height limit to maintain the relative profitability of residential projects in the area and avoid shifting the economic balance toward other uses. Also, given that the overall incentive capacity is less in the Phase 2 zones, increasing the base requirements may fully utilize the potential IZ capacity in some zones.
 - ii) **Types of affordable housing options.** The potential incentive capacity can be used to encourage provision of affordable housing benefits beyond the current inclusionary requirements. In this case, the key questions will revolve around the specific benefits desired (production of units, size of units, or level of affordability) and how these are valued in relation to other developer-provided eligible amenities, such as open space or sustainability features.
 - iii) **Options for incentivizing on-site performance.** The affordable housing policies in Phase 2 could focus primarily on incentivizing on-site performance through residential development. One way to achieve this could be to focus residential projects on increasing the number and diversity (size, number of bedrooms, level of affordability) of the affordable units generated and focus commercial projects on providing a mix of other public amenities, by eliminating the commercial fee in-lieu in these zones.
- 2) **Generally smaller capacity increases.** The lower height limits in the Phase 2 designating districts leave a smaller increment of development capacity to support an Incentive Zoning Program. This fact raises a couple of policy issues that should be considered.
 - a) **Potential base requirement changes.** Given the smaller potential IZ program capacity available in the Phase 2 designating districts, there may be operational and policy advantages in simply increasing the base requirements in some areas and limiting the IZ program where the capacity increases might support more substantial public amenities. For example, a small increase in the inclusionary zoning requirements could lead to more total units provided compared to an alternative that only uses available incentive capacity, where other amenities could also be provided.
 - b) **IZ capacity is a smaller share of total capacity.** The smaller IZ capacity may make it more difficult to provide multiple amenities on-site that result in meaningful additions to the station area environment. As a result, some of the IZ program elements adopted in Phase 1 may need to be revisited, particularly the requirement to provide at least two amenities.

Areas with Potential to Support an Incentive Program

