

November 1, 2016

Shoreline Planning Commission
17500 Midvale Avenue N
Shoreline, WA 98133

Re: *Self-storage Code Amendments*

Dear Commissioners:

We represent Lake Union Partners, the applicant of the proposed self-storage facility at 19237 Aurora Avenue N. We are writing to express our support for the self-storage code amendments and to encourage you to follow the staff recommendation and approve draft Ordinance No. 765.

The draft ordinance would allow self-storage at 19237 Aurora Avenue N, which is perfectly suited for self-storage use. The site is along Aurora Avenue with a Mixed Business zoning designation and a Mixed Use 1 Comprehensive Plan designation. The site is not on a corner, it is not a gateway location, and it is outside a Town Center and the Aurora Square Community Renewal Area. Additionally, the site has an unusual shape and difficult topography, so it would not support residential or office uses. Self-storage is the only appropriate use for this site that currently sits vacant and unused (except for illegal dumping).

We support the proposed restrictions on the locations of self-storage facilities and the proposed restrictions on uses within self-storage facilities.

Some of the proposed design requirements are overly prescriptive for self-storage use. As discussed at the last Planning Commission meeting, self-storage is appropriate on difficult sites that are not well-suited for other uses (like 19237 Aurora Avenue N). Since these sites often have unique conditions, it is not appropriate to mandate prescriptive design requirements without the possibility of departures. For example, the 35% glazing requirement is problematic (from a cost and energy-efficiency perspective) and good design can be achieved through other measures, and the limit on metal panels is overly restrictive because most metal panels are thick, durable, and attractive. A rendering of the proposed design for 19237 Aurora Avenue N is attached as Exhibit A. As currently designed, this building does not meet the 35% glazing requirement and uses metal panels. It is an attractive and well-designed multistory building that does not try to disguise its use.

We would suggest one change to address our concerns about overly prescriptive design standards. In the draft ordinance, provision SMC 20.40.505.C.9 says, "Departures from the

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Commercial Design Standards in SMC Chapter 20.50 are not allowed for self storage facilities.” Departures from commercial design standards are generally allowed through administrative design review pursuant to SMC 20.50.225. It is unclear why a self-storage facility could not pursue a departure just like any other commercial project. Unique site conditions may require design departures. Such departures would still need to meet the administrative design review criteria in SMC 20.30.297.B, which requires that the departure be “justified due to unusual site constraints so that meeting the design standards represents a hardship to achieving full development potential.” Maintaining the departure process allows some flexibility, but the design must still receive administrative approval.

We request that you support the proposed legislation without the restriction on design departures. Thank you for your continued work on this matter. We applaud your efficient review of the code amendments. After this unexpected moratorium, we look forward to moving forward with a self-storage project at 19237 Aurora Avenue N.

Very truly yours,



Holly D. Golden

HDG:dlc

E-Mail: holly.golden@hcmp.com

Direct Dial: (206) 470-7656

Fax: (206) 623-7789

ND: 21929.005 4834-4437-6123v1