

From: [Rodger Ricks](#)
To: [City Council](#)
Cc: [Clk; Rachael Markle](#)
Subject: City Council Meeting 11/28/16 - comments regarding staff report on agenda Item 8(a)
Date: Wednesday, November 23, 2016 10:17:29 PM
Attachments: [Memo To City Council 11.23.16 - by Rodger Ricks.pdf](#)

City Council Members,

Please find comments attached regarding agenda item 8(a) to be address in City Council Meeting to be held 11/28/16

Council Meeting Date: November 28, 2016 **Agenda Item: 8(a)**

CITY COUNCIL AGENDA ITEM
CITY OF SHORELINE, WASHINGTON

AGENDA TITLE:	Discussion of Draft Ordinance No. 765 Regarding New Regulations for Self Storage Facilities
DEPARTMENT:	Planning & Community Development
PRESENTED BY:	Rachael Markle, Director
ACTION:	<input type="checkbox"/> Ordinance <input type="checkbox"/> Resolution <input type="checkbox"/> Motion <input checked="" type="checkbox"/> Discussion <input type="checkbox"/> Public Hearing

Thank you for your consideration of this matter.

Regards,

Rodger Ricks

Memo

To: City Commission Members
Rachel Markle, Planning Director

From: Rodger Ricks, Cascade Investment Properties, LLC

Date: 11/23/16

**RE: Comments regarding Agenda Item – 8(a)
Draft Ordinance No. 765 to establish new regulations for Self-Storage Facilities**

Cascade Investment Properties, LLC is proposing to develop a new self storage facility at 20029 19th Ave. NE in Shoreline. The purpose of this correspondence is to comment on the Staff Report made available online 11/21/16 regarding Ordinance No. 765 to establish new regulations for Self-Storage Facilities in Shoreline. I appreciate the process in which you are giving consideration of other perspectives to further the goals of Shoreline, and it's citizens. Specific comments about Amendments follow:

Amendment #1
supported as written

Amendment #2
supported as written

Amendment #3
supported as written

Amendment #4 (a) SMC 20.40.505 (A) Location of self-storage facilities
supported as written

Amendment #4 (b) SMC 20.40.505 (B) Restrictions on use of self-storage facilities
supported as written

Amendment #4 (c) SMC 20.40.505 (C) Additional Design Requirements

Planning Commission Recommendation: The recommended supplemental design requirements, which can be found in their entirety in Attachment A, Exhibit A, for self-storage include:

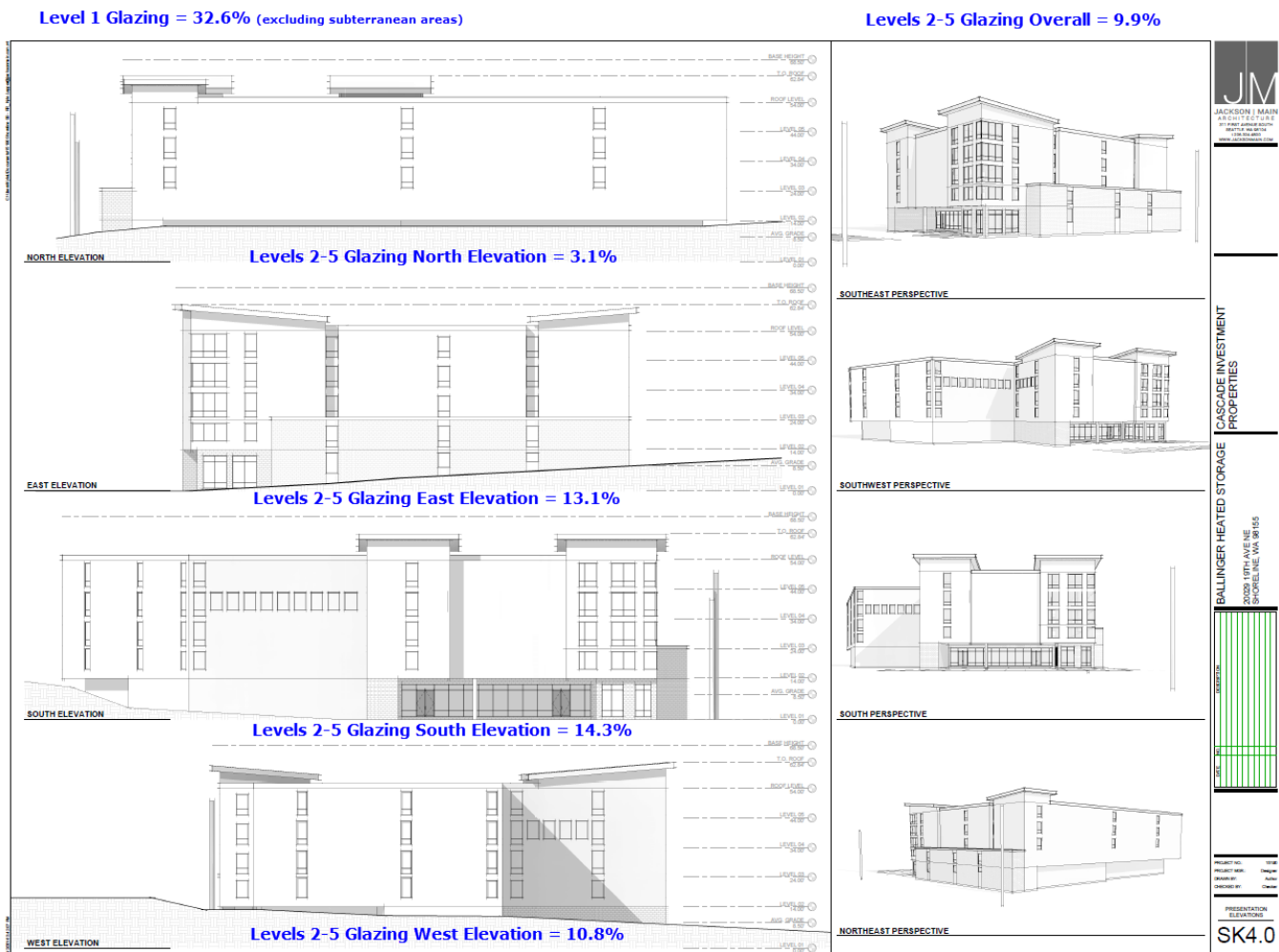
- All facilities are to be multi-story; **supported**
- All access to storage units shall be from the interior of the facility; **supported**
- Loading docks and bays must be screened; **supported**
- Standards for fences and walls; **supported**
- Minimum of 20% glazing on all floors above the ground floor visible from street/row; (Note: 50% of the ground floor is required to be glazing based on the Commercial Design standards); **opposed**
- Prohibiting the use of certain building materials; **supported**
- Requiring the use of muted exterior colors; and **supported**
- Prohibiting installation of electrical outlets in storage units **supported**

The undersigned opposes the glazing standard proposed, believing such percentages would exceed all other glazing requirements in the Seattle metro area. During the 11/3/16 Shoreline Planning Commission Minutes, Robin Murphy, a Seattle architect who has designed many self storage facilities throughout the region testified:

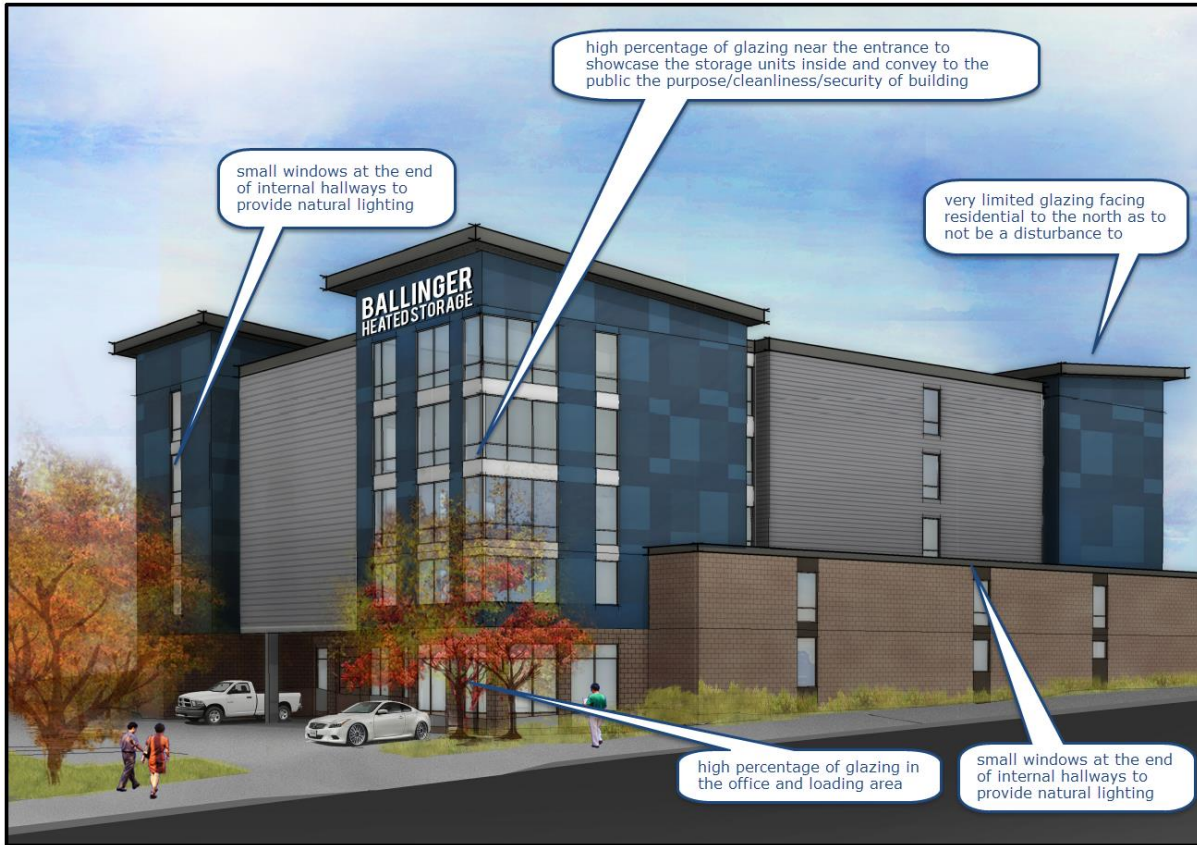
For storage, they have determined the best formula is to concentrate glazing, both vertically and horizontally, into the areas that are facing the right-of-way. It is important that the buildings are read as storage buildings rather than disguised as office buildings, but they can be designed effectively to meet design requirements by placing the windows in positions where it reads what the building actually provides to the customers. This design keeps windows away from areas that are inappropriate, such as single- and multi-family residential development and other interior lot lines. He explained that windows are very important in storage, and placing them at the end of corridors allows natural lighting into the spaces and provides a sense of security and understanding of where you are.

I concur with Mr. Murphy’s testimony, and believe the purpose of glazing should not be to attempt to disguise a multi-story self storage project as an office building, but to promote natural light to users of facility, showcasing the storage units inside building, conveying cleanliness/security of building, sense of location for tenancy provided by small windows at the end of internal hallways. It must be remembered, self storage units do not need view windows, and the greater the percentage glazing, more energy is consumed. Further, having lighted hallways face residential could be opposed by such uses.

The project proposed in the Ballinger district as shown below has **12.3% glazing overall**, which is significantly more glazing than typically found in a new multi-story self storage facility in an attempt to meet some of the goals above (shaded), with percentages shown below by: 1st floor, Levels 2-5 by Elevation, and Levels 2-5 Overall:



Below is are two perspective drawing for what is planned for the Ballinger district by the undersigned, along with some glazing comments.

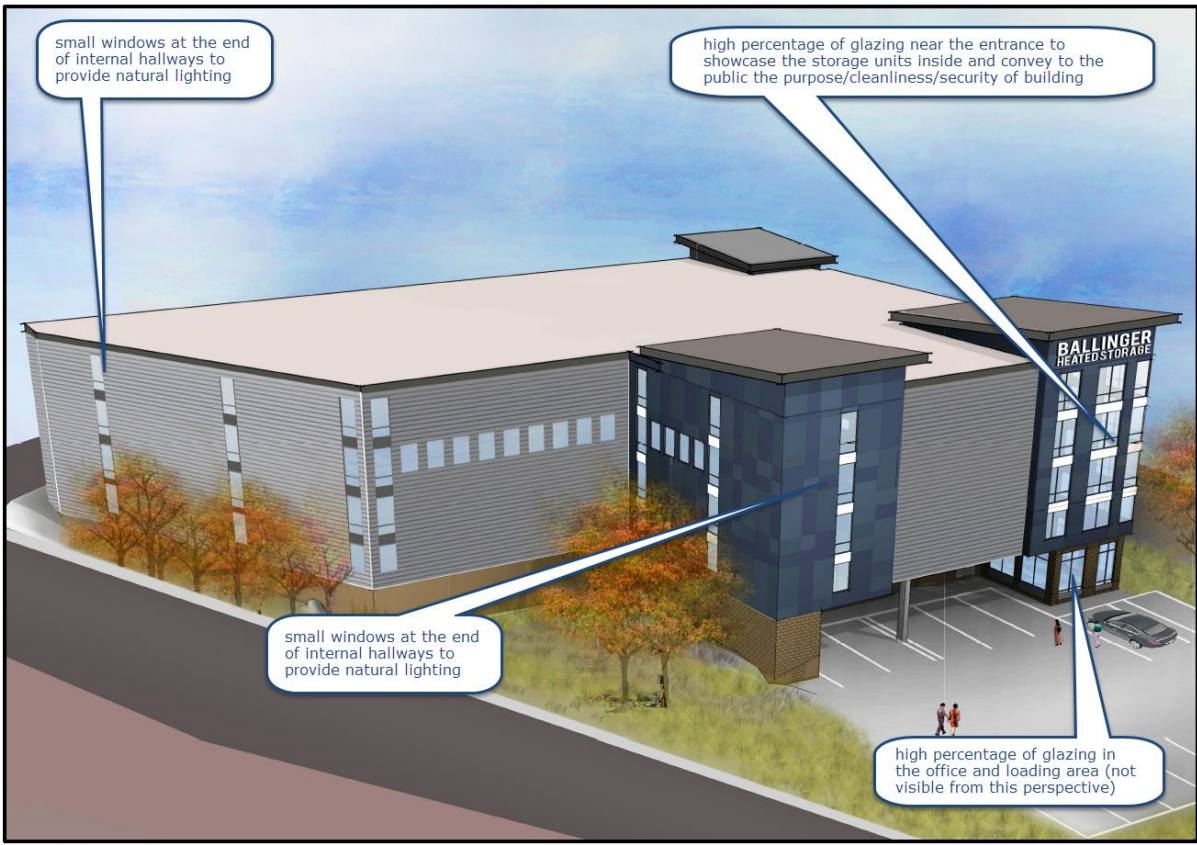


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PRJT NO.: 15190
 PRJT MGR.: KL
 DRW BY: DL
 CHK BY:

SE PERSPECTIVE
SK4.1



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 DRW BY: DL
 CHK BY:

SW PERSPECTIVE
SK4.2

I support attractive multi-story self storage buildings, and appropriate glazing is a key component to make these buildings attractive, and suggest the following glazing standard for self storage:

- **Minimum of 30% glazing on non- subterranean ground floor areas, and 10% average glazing on all floors above the ground floor visible from street/row.**

Option for Council Consideration: “Distance From” / One-Quarter Mile Radius The Planning Commission understands there is limited commercial zoned property in Shoreline that is intended to meet a variety of needs and support many complimentary goals, and thoroughly vetted the “Distance From” concept as a means to regulate the distribution of self storage facilities in the City, and rejected “Distance From” concept in favor of a variation of limitation on s.f. of self storage in an area, but ultimately elected to “let the market speak”.

The undersigned supports the Planning Commission’s conclusion to allow market demand to dictate which projects ultimately get built. It should be noted that the moratorium was affected, there was concern about 6 potential self storage facilities would be added to Shoreline, but since the moratorium went into effect, 3 of the facilities are extremely unlikely to go forward at this time based on the following:

- 19022 Aurora Ave. N. project no longer in purchase contract with self storage developer, but now under contract with multi-family developer; this is also a corner lot, which the Shoreline Planning Commission opposes for locating a self storage project.
- 17703 15th Ave. N.E. project no longer in purchase contract with self storage developer
- 14553 Bothell Way N.E. because this proposed self storage project will be adjacent to another self storage project that is currently under construction which likely will not reach stabilized occupancy until 24-36 months after construction completion, it is very unlikely the commercial financing community will accept the premise there is a need for another self storage at this area until a) adjoining project is 90% occupied, and b) market demand can be demonstrated of independent analysis. Nevertheless, the developer can capitalize his project with extremely low debt, or no debt, and not have the same scrutiny from the commercial lending community.

The undersigned supports the concept that self storage facilities should be distributed throughout the community who require such services, and agrees with the Staff Report’s prior to the 11/3/16 Planning Commission meeting, with comment that the radius requirement not be required in the Ballinger district:

The Commission could also consider a radius requirement on Aurora Avenue North and no radius requirement on Ballinger Way NE (a ¼ mile and the 500 ft. radius essentially would preclude new self-storage facilities in this area).

I also support the position of having no radius requirement in the Ballinger district, for the following reasons:

- a) The Ballinger area is a very concentrated commercial district, which is approx. ¼ mile in length in the core area, and the mandate of a radius limitation such as ¼ mile will restrict any further self storage development in this area of Shoreline given that one existing facility (Public Storage at 20040 Ballinger Way NE) is central to the district on Ballinger Way NE. See Attachment D of 11/3/16 Staff Report.
- b) The site proposed for self storage in the Ballinger district is in an area that is vastly underserved with self storage supply. The undersigned engaged a 3rd party consultant to calculate demand for self storage at the proposed Ballinger district location, and the conclusion was 161,513 s.f. of unmet demand, or in other words, this area is significantly underserved with self storage square feet.

- c) There are only two self storage facilities in the Ballinger district, both operated by Public Storage and consisting of small 30+ years old unheated single-story facility of 42,665 s.f. located at 20065 15th Ave. NE, and a small 10 year old heated multi-story facility of 47,650 s.f. located at 20040 Ballinger Way NE, for a total supply of self storage space of only 90,315 s.f. NRA. The “distance from” requirement only considers nearby self storage usage, but in order to meet community demand should consider square feet of self storage supply, **and is it sufficient to address the community’s needs**. The demand study referenced above, suggest there is demand of 251,828 s.f. of demand, and only 90,315 s.f. of supply.
- d) When there is a shortage of self storage supply in a district, occupancy levels are very high (ie. 99% is typical in spring/summer) and operators like the two Public Storage facilities in the Ballinger district charge rents higher than surrounding areas where supply and demand are in balance.
- e) The site proposed for self storage in the Ballinger district has been vacant for 22 years, and was formerly the site of 2 older residences which were demolished to make way for commercial uses. Unfortunately, in 22 years there has not been a viable use for this vacant parcel with the market rejecting the parcel for retail uses, economics rejecting this parcel of suburban office and multifamily (parking costs). According, the proposed self storage in the Ballinger district is not the “limited commercial zoned property in Shoreline” that needs to be preserved.
- f) The proposed self storage in the Ballinger district would have frontage on 19th Avenue NE, which is considered a “Minor Arterial” by Shoreline, and given the type of arterial it is on and it’s vacant status for 22 years, it can be concluded that putting a self storage on this parcel would not diminish the supply of more choice commercial parcels in Shoreline located on “Major Arterials”.
- g) The proposed self storage in the Ballinger district is already segregated from Community Renewal Areas and Town Centers which the code Amendments seek to ensure self storage is not allowed.
- h) The mandate of a radius limitation for new self storages, effectively makes patrons of such facilities travel further distances to comparison shop for self storages services. This is in contract to zoning of many cities which allow self storage to concentrate in particular areas for the benefit of it’s citizens.

The staff noted

“If Council is interested in a “distance from” regulation, then Council may want to consider allowing an exception to the “distance from” regulation. An exception would ideally require the self-storage facility project to include elements that directly address the City’s vision, goals and policies such as: a requirement for commercial space on the ground floor; or inclusion of live/work lofts; or inclusion of spaces for small business development, or studio space for example. The staff recommendation included an exception to the “distance from” requirement if 75 percent of the required ground floor commercial space is devoted to other permitted uses in the zone besides self-storage.

It should be noted that the Planning Commission rejected mixing commercial will self storage. The undersigned also opposes mixing commercial with self storage for the following reasons.

- 1) Every self storage facility is designed to provide an assortment of unit sizes to address tenant needs with units typically ranging in size from 25 s.f. to 300 s.f. A prudent multi-story self storage design in Shoreline would include some of the larger storage units (ie. 10x30, 10x25, 10x20), and place these larger units to not be dependent on the elevators in a multi-story structure, which

design multi-story design is desired by Shoreline. Elevators are an acceptable means to access smaller units, but the biggest units should be on the first level and not used for commercial space.

- 2) The list of commercial uses and tenancies that are compatible with self storage, which emphasizes a ground floor dedicated to loading and unloading of storage and a parking lot with a loading dock is extremely short, although sometimes a mailbox and packaging outlet can have a very small commercial presence within a self storage project.

Thank you for your consideration of this matter. Rodger Ricks