

Attachment A. 3. Public Comment Matrix

Phase 2 of Amendments to the Redmond Zoning and Municipal Codes as Periodic Rewrite of Redmond's Development Regulations

Note: Redmond Planning Commission held its public hearing on September 27, 2023 and kept it open for written public comments through October 25, 2023.

Name	Topic	Comment Summary	Written/Verbal
David Morton	Redmond Zoning Code: Critical Aquifer Recharge Area prohibited land use activities	Request to the City to take proactive steps to safeguard drinking water/aquifer from contamination. He identified the prohibited land use activities in RZC 21.64.050.C, requesting amendment on this section concerning Critical Aquifer Recharge Areas (CARAs) I and II.	Verbal and Written September 27, 2023
Evan Lawler, Katie Kendall, and Keith Hubrath	Redmond Zoning Code: Clarify allowance of ambulatory or outpatient services in the Northwest Design District	Ambulatory or outpatient services was thought to be included in the allowed uses for the Northwest Design District. The use class allows for dentists and clinics.	Verbal and Written September 27, 2023

Attachment C: Public Comments

1. David Morton Comments

From: [David Morton](#)
To: [Planning Commission](#)
Cc: [Ian Lefcourte](#); [Kim Dietz](#); [Amanda Balzer](#); [Jessica Atakson](#); [Carol Helland](#); [Aaron Bert](#); [Jenny Lybeck](#); [Becky Frey](#); [Lauren Alpert](#); [Glenn Coil](#); [Redmond 2050](#); [Cathy Beam](#); [Lauren Anderson](#); [Council](#); [Mayor Council](#); [Mayor \(Internet\)](#); [Oneredmond Info](#); [Patrick Jurney](#); [Andrea Martin](#); [pwilliams@redmond.gov](#); [Malisa Files](#); [Jill E. Smith](#); [Mike Brent](#); [Andy Swayne](#); [David Hoffman](#); [jor_mig_santos@hotmail.com](#); [tammyvupham@icloud.com](#); [Rheya Wren](#); [Saanvi Bathla](#); [Erik Bedell](#); [Dave Otis](#); [Zwanziq, Macy](#); [brandon.levritz@pse.com](#); [Jones, Karissa](#); [James Terwilliger](#); [Anastasiya Warhol](#); [David Baker](#); [Milton Curtis](#); [Angela Kugler](#); [Nigel Herbig](#); [Joe Marshall](#); [Melanie OCain](#); [Andrew McClung](#); [David Barnes](#); [Brian Stewart](#); [Corina Pfeil](#); [Debra Srebnik](#); [City Hall](#); [Cheryl D. Xanthos](#); [City Clerk](#); [Jeff Churchill](#); [PLAN - Redmond 2050 - Technical Advisory Committee](#); [Chip Cornwell](#); [Steve Yoon](#); [Odra Cardenas](#); [Brian Collins \(GWS\)](#); [Buck, Brian](#); [Arielle Dorman](#); [Kim Faust](#); [Tom Hitzroth](#); [Marilyn Lazaro \(City Volunteer\)](#); [Yeni Li](#); [Tom Markl - Economic Development Board of Directors](#); [Phil Miller](#); [Ray Savers](#); [Kelli Refer](#); [Sol Dressa](#); [David Godfrey](#); [Court Olson](#); [Barbara Braun](#); [Dave Russell](#); [Phil Ritter](#); [Bill Westre](#); [Annie Phillips](#); [Cynthia Ervin](#); [Cynthia Ervin](#); [Robin Briggs](#); [Ron Snell](#); [Sarah Richards](#); [Iris Antman](#); [Terry Jorgensen](#); [Linda Golley](#); [Stacey Valenz](#); [Vicki Grayland](#); [Steven Bolliger](#); [David Perk](#); [Emanuel](#); [Ann Fletcher](#); [Colleen Clement](#); [Callie Ridolfi](#); [Anne Udalov](#); [Hollytownes](#); [Linda Hagedorn](#); [Kristi Weir](#); [Gwen Hanson](#); [Marilyn Mayers](#); [David Ramsay](#); [David Perk](#); [Dan Streiffert](#); [Scott Patterson](#); [Greg Smith](#); [paulared325@hotmail.com](#); [Neal Anderson](#); [Brady Nordstrom](#); [Paul Bruno](#); [AA](#); [April Stevens](#); [Cameron Barajas](#); [Alice Meng](#); [Jonny Lu](#); [Christopher Randels](#); [Devon Kellogg](#); [Marilyn Subala](#); [Rachel Molloy](#); [Bonnie Shipman](#); [Howard Harrison](#); [Gene Olson](#); [David Lee](#); [Seraphie Allen](#)
Subject: A Public Comment at the Redmond Planning Commission meeting on 9/27/23 by David Morton
Date: Wednesday, September 27, 2023 11:35:50 AM
Attachments: [Tenth talk to Redmond Planning Commission.docx](#)

External Email Warning! Use caution before clicking links or opening attachments.

Dear Redmond Planning Commissioners,

I wish to provide spoken public comment during the public hearing portion of the September 27, 2023, meeting of the Redmond Planning Commission. The public hearing is scheduled during agenda item #4 (Redmond Zoning Code Rewrite: Annual Code Cleanups).

I plan to be present at City Hall to present my public comment in person at the podium.

My 3- to 5-minute comment is attached as a Word document (containing [blue and underlined hyperlinks](#)) and is inserted in the body of this email below.

Here are relevant links from the agenda regarding agenda item 4:

[Memo](#)

[Att. A: Technical Committee Report \(also provided 9/13\)](#)

[Att. A.1: Proposed Zoning and Municipal Code Amendments](#)

[Att. A.2: Amendment Summaries and Analysis](#)

[Att. B: Issues Matrix](#)

☐ ☐ ☐ **The Following Is My 3- to 5- Minute Public Comment** ☐ ☐ ☐

Redmond must take **proactive** steps to safeguard its drinking water aquifer from contamination resulting from new developments in its [Critical Aquifer Recharge Areas](#) (CARAs). To achieve this, the city should consider amending its Zoning Code regarding its CARAs.

The prohibited land uses and activities that pose a hazard to the City's CARAs are listed in [RZC 21.64.050.C](#), though they are not similarly identified within Article I chapters. [Staff](#)

[identified the need for cross-references](#) from RZC Chapters 21.10, 21.13 and 21.14 to [RZC 21.64.050.C](#), which lists the Prohibited Land Uses in the CARAs.

However, I have not seen an amendment to correct a flaw in 21.64.050.C.

Its [Subsection 1](#) lists **25** prohibited land uses and activities **in CARA I**, but

[Subsection 2](#) lists only **2** prohibited land uses and activities in **CARA II**.

CARAs I and II lie over the same aquifer. The only [difference between CARA I and CARA II](#) is:

- In **CARA I**, it takes **up to 5 years** for groundwater contamination to reach City-owned public water wells.
- In **CARA II**, it takes **more than 5 years** for groundwater contamination to reach those wells.

Contaminating the groundwater in **CARA II** is as bad for water quality and public health as contaminating the groundwater in **CARA I**. **All 25 of the prohibited land uses and activities in CARA I should also be prohibited in CARA II.**

The City of Redmond has a [Pollution Prevention Assistance Agreement](#) with the state Department of Ecology. The [Program](#)'s mission is to safeguard residents and the environment by helping small businesses reduce toxic chemical usage, safely manage hazardous waste, and prevent stormwater pollution. As part of the Agreement, Redmond will conduct site visits to [businesses that may potentially pollute groundwater](#) within its CARAs to conduct risk-based assessments.

The Redmond Zoning Code could require that businesses wishing to locate on Redmond's CARAs first be proactively assessed through this [Program](#) for their risk of potential groundwater contamination.

To **avoid contaminating its drinking water aquifer**, Redmond might consider the following:

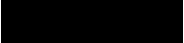
1. Establish stricter zoning regulations for CARAs, ensuring that high-risk activities such as [industrial and chemical storage facilities are prohibited](#) within these areas. Implement setback requirements to keep development a safe distance from aquifer recharge zones.
2. Require comprehensive environmental impact assessments for any development proposed in CARAs, including hydrogeological studies, soil testing, and potential contaminant modeling to evaluate the impact on groundwater quality. Developers should be obligated to fund and adhere to mitigation measures.
3. Incentivize low-impact development (LID) techniques within CARAs, such as permeable pavements, green roofs, and stormwater retention systems to reduce runoff and minimize pollutants entering the aquifer.
4. Implement stringent monitoring and reporting requirements for existing and new developments in CARAs. Regular inspections should be conducted to ensure compliance with environmental safeguards.
5. Educate the public to increase awareness of the importance of CARAs and the need for their protection. Stakeholders, including residents, businesses, and environmental organizations, should be engaged in the Zoning Code amendment process.

Through proper amendment of the Zoning Code, Redmond can fortify its commitment to

preserving its drinking water aquifer and maintaining the long-term sustainability of this vital resource.

☐☐☐ **End of My 3- to 5- Minute Public Comment** ☐☐☐

Sincerely,

Dr. David Morton
Redmond, 98053


Attachment C: Public Comments

2. Northwest Design District Comments from Lawler, Kendall, and Hubrath

From: [Courtney Flora](#)
To: [Planning Commission](#); [Kim Dietz](#)
Cc: [Carol Helland](#); [Evan Lawler](#); [Keith Hubrath](#); [Katie Kendall](#)
Subject: Code Cleanup Ordinance
Date: Tuesday, September 26, 2023 3:19:50 PM
Attachments: [Proctor Willows, Use Clarification.pdf](#)
[Agenda Memo No.pdf](#)
[Proctor Willows - Medical Office Trip Generation Memo.pdf](#)

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Hello-- Please see the attached letter and attachments submitted on behalf of Goodman Real Estate for tomorrow night's Planning Commission meeting, item #4 (Annual Code Cleanup).

Evan Lawler and Keith Hubrath from Goodman, and Katie Kendall from my office, are planning to attend in support of our request for a clarifying amendment to the Northwest Design District zoning to allow for medical office uses.

Thank you for your attention to this, and please reach out with any questions. Thank you!

Courtney Flora

Partner

McCULLOUGH HILL PLLC

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McCULLOUGH HILL, PLLC

September 26, 2023

VIA EMAIL

Redmond Planning Commission
c/o Kim Deitz, Principal Planner
City of Redmond
15670 NE 85th Street
Redmond, WA 98073
KDIETZ@REDMOND.GOV

Re: Proctor Willows, Medical Office Use Clarification

Dear Planning Commission Members:

We are writing on behalf of Goodman Real Estate, owner of the mixed-use portion of the “Proctor Willows” project, located at the corner of NE 124th Street and Willows Road. It has recently come to Goodman’s attention that the site’s zoning does not appear to allow medical office (classified in Redmond as an “institutional health and service use”). This was a surprise and has become a significant issue because Goodman needs to secure a tenant for occupancy in mid-2024. This is an ideal location for medical office, and Virginia Mason has expressed strong interest in the space.

The omission of medical office as a permitted use in this zone was a clear oversight. The site is zoned Northwest Design District (“NWDD”), a new zoning district developed in 2018/2019 specifically for this site. This site was previously zoned Business Park (“BP”) but had been vacant for 20 years because the site topography and location would not support a large-format office/manufacturing/business park use. Quadrant Homes determined the site was better suited for residential uses, and it proposed an amendment to the BP zoning that would add standalone and detached housing types to supplement the multi-family housing already allowed in the BP zone.

Instead of amending the BP zoning, the City directed Quadrant to develop a new “Northwest Design District,” with zoning and incentives tailored to the site. The focus of the new zoning effort was to add a diversity of housing types, but to ensure a mixed-use project with neighborhood-serving businesses, the City required a mandatory 22k sq. ft. of “nonresidential uses.”

I represented Quadrant in the development of the NWDD regulations (and companion Comprehensive Plan amendment, rezone, and Master Plan), and I had extensive discussions with Andrew Bauer, Jae Hill, and Erika Vandenbrande (among others) to determine which uses should be carried over from the BP zoning into the new NWDD. Manufacturing, wholesale trade and regional uses were prohibited, but the full range of retail and professional and personal services were permitted outright in the new NWDD zone. The intent was to carry over all permitted BP uses that would make sense in a mixed-use project in this location.

As evidenced in the attached Memorandum from the Mayor to the City Council on March 5, 2019, the NWDD district was adopted to “create flexible regulations that would facilitate the development

of a mixed-use site that allows uses such as townhomes, apartments, mixed-use structures, office, and neighborhood-scaled commercial services.” In addition, the NWDD zoning allowed for a “broad range” of services to “serve the surrounding neighborhood and the future employees and residents living and working on the site.”

Ultimately, all “health and personal care” uses, “professional services,” and “personal services” were permitted outright in the NWDD. Admittedly, “ambulatory or outpatient services” (the use category that allowed medical offices in 2019) was not specifically listed as a permitted use in the NWDD zone— but there is no indication that staff, Planning Commission or the Council intended to exclude this use. To the contrary, we discussed neighborhood clinics, dentists, etc. being appropriate uses for this mixed-use project. Notably, daycare is permitted outright in the NWDD zone (and daycares are now included in the same “institutional health and human services” zoning category as clinics, dentists, and chiropractors).

As a result of this oversight, Goodman could lease space to a nail salon, veterinarian’s office, day care center, optometrist or law office— but not to a dentist, chiropractor or neighborhood clinic. This makes no sense, and it is inconsistent with the “community-serving” function of the NWDD zone. It reinforces the fact that the omission of medical office was an oversight.

A medical office use would have no greater environmental impact than any of the allowed uses in the NWDD zone. The transportation study prepared for the NWDD Comprehensive Plan amendment/rezone/Master Plan assumed 9,000 sq. ft. of office, a 8,500 sq. ft. day care, and 5,000 sq. ft. of retail. The Transpo Group, the same transportation engineering firm that prepared the 2018 trip generation analysis for the NWDD rezone, has evaluated the impact of replacing these uses with 22,500 sq. ft. of medical office. Transpo concluded that the “medical office land use would result in fewer peak hour trips generated and lessen the impact on surrounding streets.” *See* attached memorandum from the Transpo Group, dated September 25, 2023.

Goodman is asking the Planning Commission to rectify this oversight in the code cleanup ordinance by adding “institutional health and service uses” as a permitted use in the NWDD zone. The NWDD was designed to allow flexible, neighborhood-serving retail and office uses; medical office is exactly what was intended. These uses would benefit the project and the neighborhood as a whole.

Thank you for considering these comments.

Sincerely,

[Courtney E. Flora]

Courtney E. Flora

cc: Carol Helland, Planning Director

MEMORANDUM

Date:	September 25, 2023	TG:	1.16159.02
To:	Courtney Flora – McCullough Hill, PLLC		
From:	Michael Swenson, PE, PTOE – Transpo Group		
Cc:	Evan Lawler – Goodman Real Estate		
Subject:	Proctor Willows – Medical Office Trip Generation		

This memorandum summarizes the analysis conducted regarding the forecast trip generation for the proposed medical office land use on the Proctor Willows site and compares it to the previous trip generation the City relied on when it adopted the “Northwest Design District” Comprehensive Plan amendment and rezone for the Proctor Willows site in 2018.

Though the 2018 analysis did not include medical office, this memorandum demonstrates that a medical office use in the project would result in fewer peak hour trips than the originally analyzed commercial uses and lessen the impacts on surrounding streets.

Previous Analyses

The September 11, 2018 memorandum from Transpo Group provided a vehicle trip generation comparison for multiple development scenarios, shown below. The Proposed Zoning (Revised) development scenario included a mixed-use and townhomes project. Under this development scenario, a total of approximately 2,700 weekday trips were generated with 240 during the weekday AM peak hour and 273 during the weekday PM peak hour (note that the numbers in the table are rounded). Of the 273 PM peak hour trips, 158 trips were from the residential component and the remaining 115 trips were from the commercial piece, assumed to consist of 22,500 sf of commercial space, including 9,000 sf office, 8,500 sf daycare, and 5,000 sf retail.

Vehicle Trip Generation Comparison

Development Scenario	Weekday	AM Peak Hour	PM Peak Hour
Current Zoning: Mixed Use ¹	5,400	320	390
Current Zoning (0.45 FAR): Business Park ²	3,700	420	380
Current Zoning (1.00 FAR): Business Park ³	8,500	950	860
Proposed Zoning: Townhomes & Mixed Use ⁴	3,500	240	290
Proposed Zoning (Revised): Mixed Use & Townhomes ⁵	2,700	240	270

¹ Assumes 604 apartments and 45,000 sq. ft. of retail

² Assumes 300,000 sq. ft. of business park

³ Assumes 680,000 sq. ft. of business park with green building incentives

⁴ Assumes 175 townhomes, 300 apartments, and 15,000 sq. ft. of retail

⁵ Assumes 175 townhomes, 195 apartments, 9,000 sq. ft. of office, 8,500 sq. ft. of daycare, and 5,000 sq. ft. of retail

Current Request

Commercial tenants have not yet been secured for the project, but there is a high demand for “medical office” in this space, which includes dentists and walk-in clinics. Virginia Mason has been identified as a possible tenant for this location. You have asked us to analyze trip generation associated with a medical office use in place of the 22,500 gsf of the various commercial uses analyzed in the original 2018 analysis.

Trip generation rates were taken from the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 10th Edition* (consistent with the previous analysis). ITE provides trip rates for a couple of medical related uses that best fit the proposed land use. These uses include ITE land uses LU 630 – Clinic and LU 720 – Medical-Dental Office Building that are two related uses. These two related uses are similar in definition in that both facilities provide “*diagnostic and outpatient care but are unable to provide prolonged in-house medical and surgical care*” per the ITE definition. However, per the ITE definition: “*clinics commonly have lab facilities, supporting pharmacies, and a wide range of services (compared to the medical office, which may only have specialized or individual physicians)*”. Nevertheless, our analysis uses the higher rate of the two land uses which is associated with LU 720 – Medical-Dental Office Building in order to provide a more conservative estimate. Table 1 shows the trip generation for the current request.

Table 1. Medical Office Trip Generation Summary

Land Use	Size	Rate ¹	Project Trips		
			Total	In	Out
Medical-Dental Office Building (LU 720)	22,500 sf				
Daily		34.80	782	391	391
AM Peak Hour		2.78	63	49	14
PM Peak Hour		3.46	78	22	56

Note: sf = square-feet

1. Trips rates from ITE Trip Generation Manual, 10th Edition.

As shown in Table 1, the proposed medical use is forecast to generate 78 PM peak hour trips. This is less than the 115 trips generated by the commercial portion of the previous Proposed Zoning (Revised) development scenario, by 37 trips. The medical office land use would result in fewer peak hour trips generated and lessen the impacts on the surrounding streets.



MEMO TO: Members of the City Council

FROM: Mayor John Marchione

DATE: March 5, 2019

SUBJECT: Adoption of Northwest Design District Policies, Regulations, and Rezoning the Proctor-Willows Site

I. RECOMMENDED ACTION

Adopt the proposed ordinances to enact the Comprehensive Plan and Zoning Code amendments related to the Northwest Design District for the Proctor-Willows property. The ordinances will:

1. Change the Comprehensive Plan land use designation on the Proctor site from “Business Park” to “Design District.”
2. Create Comprehensive Plan policies for the Northwest Design District.
3. Change the zoning designation on the Proctor site from “Business Park” to “Northwest Design District.”
4. Create zoning regulations to implement the Northwest Design District.

II. DEPARTMENT CONTACTS

Erika Vandenbrande, Director, Planning and Community Service	425-556-2457
Jae Hill, AICP, CFM, Manager, Long-Range Planning	425-556-2414
Andrew Bauer, AICP, Senior Planner	425-556-2750

III. DESCRIPTION/BACKGROUND

The Quadrant Corporation (Applicant) proposes Comprehensive Plan and Zoning Code amendments to change the zoning on a property at the SW corner of NE 124th Street and Willows Road from “Business Park” to “Design District.” The proposed amendment would create flexible regulations that would facilitate the development of a mixed-use site that allows uses such as townhomes, apartments, mixed-use structures, office, and neighborhood-scaled commercial services. Current zoning allows residential uses as part of a mixed-use residential structure but prohibits standalone and detached residential uses.

The Applicant filed the request in April 2016 as part of the Comprehensive Plan docketing process. Staff held two neighborhood meetings to receive feedback on the proposal and to

inform draft policies and regulations. In Summer 2018, the Planning Commission held a series of meetings and a public hearing which resulted in the Applicant modifying the proposed land use concept in September 2018. An additional public hearing was held to receive testimony on the modified proposal.

A. Analysis

The City and Applicant have worked collaboratively to create draft policies and regulations which are flexible and that respond to the unique characteristics of the site. The key outcomes of the policies and regulations are:

1. Horizontally-integrated, mixed-use site: Proposed regulations create flexibility for residential and non-residential land uses to be located on the site in a manner that best integrates with the site and its context.
2. Opportunity for expanded housing types: Residential land uses are proposed to be expanded to allow a broader range of housing types, including townhomes and apartments (part of a mixed-use structure or standalone). Allowing a range of housing types creates needed flexibility to integrate with the site and its context and creates more variation in housing affordability.
3. Opportunity for more commercial uses and increased flexibility: Proposed regulations include a broad range of allowable commercial uses intended to serve the surrounding neighborhood and the future employees and residents living and working on the site.
4. Green development incentives specific to the site: Proposed regulations include provisions for green development incentives which must be utilized to achieve the maximum development potential. The incentives were developed specific to the site and are intended to be used in lieu of the existing Green Building Incentive Program.

Most Appropriate Land Use Designation

Besides Design District, other land use designations were considered and determined to be inappropriate for the site. Designations such as “Multifamily Urban” or “Neighborhood Commercial” apply to multiple properties citywide and do not provide the flexibility necessary to adequately respond to the unique characteristics and context of the site. Furthermore, other designations have limitations on mixed use development (horizontal and vertical) or prohibit them entirely.

IV. PREVIOUS DISCUSSIONS HELD

Below are the major milestones of the process to-date:

- April 2016: Applicant proposed rezoning property from Business Park to Design District
- 2017: Neighborhood Meetings; draft policies & regulations developed
- February 2018: Non-Project SEPA Determination of Non-Significance
- May 31, 2018: Technical Committee Recommendation
- June-July 2018: Planning Commission review; Public Hearing

- September 2018: Modified proposal submitted
- October 19, 2018: New Technical Committee Recommendation for modified proposal
- October 24, 2018: Public Hearing before the Planning Commission
- November 7, 2018: Planning Commission Recommendation
- January 22, 2019: City Council Study Session
- February 19, 2019: Planning and Public Works Committee of the Whole

V. IMPACT

A. Service/Delivery:

If the Comprehensive Plan and Zoning Code amendments are approved, the Applicant could proceed to filing applications for a Master Plan and Development Agreement to develop the site. Necessary infrastructure and improvements to serve future development would be required to be constructed by the Applicant.

B. Fiscal Note:

Future development of the site would pay development application fees and impact fees. Once developed, future improvements and uses on the site would be assessed property taxes and sales tax, as applicable.

VI. ALTERNATIVES TO STAFF RECOMMENDATION

Condition or modify the Planning Commission recommendation and/or the proposed policies or regulations.

VII. TIME CONSTRAINTS

The Applicant initiated their request with the 2016 Comprehensive Plan Docket, and is eager to advance to the Master Plan and Development Agreement review process – pending action on the Comprehensive Plan and Zoning Code Amendment.

VIII. LIST OF ATTACHMENTS

Attachment A: Ordinance Amending the Comprehensive Plan

Exhibit 1: Planning Commission Report

Exhibit 2: Comprehensive Plan Map Amendment

Exhibit 3: Northwest Design District-Comprehensive Plan Policies

Attachment B: Ordinance Amending the Redmond Zoning Code

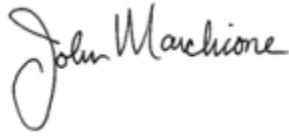
Exhibit 1: Planning Commission Report

Exhibit 2: Zoning Map Amendment

Exhibit 3: Zoning Code Amendments



Erika Vandenbrande, Director of Planning and Community Development



Approved for Agenda _____
John Marchione, Mayor