Item #_____

Edmonds Planning Board
Agenda Memo

Meeting Date: August 13, 2008

Agenda Subject: Review / Work session on Ground Floor issues in the BD1 zone.

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Initiated By: ☑ City Council ☐ Planning Board ☐ City Staff ☐ Citizen Request ☐ Other:

A recent code interpretation was requested involving the configuration of the ground floor in the BD1 *Downtown Retail Core* zone (see Attachments 4 and 5). The City Council confirmed staff's interpretation, which was based on the public record related to the development and adoption of the downtown BD zones (see Attachments 2 and 3). Even though Council confirmed the code interpretation – and adopted the interim zoning ordinance contained in Attachment 1 clarifying the code language – the issues raised in addressing the code interpretation and responding to the applicant's concerns indicated to both Council and staff that it would be desirable to review the ground floor requirements in the BD1 zone. The Planning Board has been requested by the City Council to conduct that review and make a recommendation to Council on any appropriate changes to the code (see Council minutes of July 22, 2008, in Attachment 2).

In brief, the problem is that the existing code language does not acknowledge or allow for situations where the depth of a lot potentially results in retail commercial space that is too deep from the street front to be usable. This result arises if the entire ground floor must be devoted to commercial space that has a 15-foot floor-to-floor height. The building design proposed by the applicant in their request for a code interpretation (see Attachment 5) is a good illustration of the problem. Without some allowance for varying use of the ground floor, inefficient use of space could result. In addition, although parking is not required for commercial space in the BD1 zone, providing parking is a general benefit to the downtown if it doesn't detract from available *quality* retail space.

If you review the existing code language for BD1 (in combination with the interim zoning ordinance clarifying the language in Attachment 1), you will note that there is a provision allowing other uses behind 60 feet from the street front in the BD2 and BD3 (and BD4) zones (see ECDC 16.43.030(B)(3)). This provision was not applied in BD1, and was confirmed by the interim zoning ordinance and staff interpretation.

In reviewing information related to retail space sizes and dimensions, staff found several patterns appearing in the literature (we have included some sample materials in Attachment 6). First, it is

very hard to find a clear discussion of desirable retail store depths independent of any other factor. What you see instead are ranges of desirable store sizes (something around 2,000 sq. ft. seems to be a good "average" downtown retail space) and store front spacing (a retail store front generally every 20-30 feet, for example). As you would expect, different types of retail stores (and restaurants) require differently sized spaces. Nonetheless, it's the consistent pattern of store fronts and usable space that is critical.

The literature also confirms the desirability of windows and rhythm in store fronts, with store fronts located adjacent to the public walkway for ease of both visual and physical access.

What is also clear is that you need to retain flexibility in retail space, so that businesses can come and go without being constrained by a limited supply of desirable quality space. Anecdotally, this has been a problem in downtown Edmonds, with businesses that wish to locate downtown being discouraged by the lack of adequate "quality" retail space. Setting a retail store depth requirement that is too shallow will endanger that desired flexibility of space that is necessary to retain and allow expansion of retail businesses in the future.

Also remember that the necessary depth of a retail space isn't just the display space that you see – it also has to include inventory and storage space for retailers and kitchens for restaurants or eating establishments.

For your reference, we've also included some brief summaries of studies analyzing the benefits of locally-based, relatively small-scale retail businesses to the health and economic vitality of downtown business districts. This fits in with the concepts expressed in the draft Edmonds Sustainability Element which is up for discussion elsewhere on the Planning Board's agenda.

To summarize, staff believes there are several clarifications and corrections that would be appropriate to include in a public hearing draft of proposed BD zone changes. These include:

1. Clarify that the 15-foot ground floor height requirement in BD1 only applies to the first 60 feet of commercial space measured from the street front. Behind 60 feet, the ground floor will be considered to be the floor that is closest in elevation to the ground floor, but that floor does not have a minimum height requirement.
2. Clarify ECDC 16.43.030(B)(6)(f) so that only those commercial spaces within 60 feet of the street front in BD1 must have direct access to the street. The current requirement would make no sense if additional commercial spaces are located to the rear of the building, behind the street-front commercial space.
3. Clarify ECDC 16.43.030(B)(6)(c) so that it is clear that the 30-foot minimum depth was intended to apply only to properties in the BD2 and BD3 zones. We would not recommend reducing store front depths to less than 60 feet even for "shallow" lots in the BD1 zone.
4. Clarify the uses allowed on the ground floor located behind the first 60 feet. Parking should be allowed behind the first 60 feet. In addition, the BD2 and BD3 zones should continue to allow residential uses behind the first 60 feet.
5. Clarify that for corner lots, the 60-foot requirements noted above do not apply to street fronts of buildings when they are located on side streets at the edge of the BD1 zone district (i.e. when the lot is on a corner that is transitioning to another zone across the street). However, all street fronts along Main and 5th will always have the 60 foot requirements applied, corner or not. For example, if this rule were applied, the prospective 555 Main Street building would have a 60-foot requirement applied to the

building frontage on Main Street, but not on 6th Avenue North – since the east side of 6th Avenue is not within the BD1 zone.

6. Clarify that conversion of existing building space to commercial use does not trigger the ground floor height requirements. This is covered under the non-conforming regulations, but it would help to clarify the issue in the BD zones so there can be no question raised.

Attachments:

1. Interim Zoning Ordinance approved by City Council on 7/22/2008, with existing BD zone language from ECDC 16.43
2. City Council Minutes (7/22/2008, 7/15/2008)
3. Previous BD1/Retail Core Ground Floor Discussions
4. Staff Interpretation #2008-2, BD1 Ground Floor Requirements
5. Request for formal Code interpretation
6. Retail space references/excerpts
   - Alexandria, Virginia
   - Institute for Local Self-Reliance / New Rules Project
   - Whistler Village Sustainable Retail Study (2007)
     (summary sheet and excerpt from *Findings & Recommendations*)
   - Summary from San Francisco Retail Diversity Study (May, 2007)
   - Excerpt from *Downtown Development Handbook,* Urban Land Institute, 1992