

September 12, 2023

City of Lacey Community Development Department
420 College Street SE
Lacey, WA 98503.

RE: Horizon Pointe Village Center Master Plan Amendment

To whom it may concern:

In support of C2 Holdings, LLC request for a modification to the existing Horizon Pointe Village Center Master Plan to convert an existing retail shell building into self-storage we offer the following justification and analysis.

Self-storage as a use in a Village Center

Self-storage facilities are not addressed as a permitted use in the Village Center ordinance (LMC 16.59.050 – Permitted Uses.) The Lacey Municipal Code (LMC) does allow the city to permit the modification of the provisions of the Village Center ordinance provided that the modification satisfies the intent of the comprehensive land use plan and the modifications are consistent with the standards listed in LMC 16.59.030(I)1-9.

The commercial retail component of the Village Center concept for Horizon Pointe envisioned in the early 1990s has not come to fruition due to:

1. Unrealized demand for multifamily units in the housing market limiting the number of rooftops within the Horizon Pointe Village Center.
2. Conservative commercial lending practices in the financial sector.
3. Physical and locational characteristics relative to visibility of the location to pass-by traffic on arterial and collector roadways proximate to the site.
4. Physical and locational characteristics relative to existing retail in close proximity to the site (i.e., Lacey Crossroads, Summerwalk, Thornbury Crossing, etc.).

Converting the building shell to self-storage provides nearby residents with a needed service and will have the benefit of reducing vehicle trips, or length of vehicle trips between residents in proximity of a storage unit they desire to rent.

Standards for modifications and design

Per LMC 16.59.030(I) the City may permit modifications to the provisions of the Village Center ordinance in order to encourage village centers and more fully satisfy the intent of the comprehensive land use plan if the following standards are met:

1. The design and improvement of the village center shall be in harmony with the purpose and intent of this ordinance and the comprehensive land use plan.

Response: The requested change of the retail building shell to self-storage puts forward a viable plan for a service that is currently in demand. Economic and demographic realities of today's commercial/retail real estate market dictate that retail services at the Horizon Pointe Neighbor Commercial location are not viable as there has been no interest from prospective tenants to locate in the retail building shell. Conversely, the self-storage facility currently in use has been well received and highly successful.

The Horizons Planning Area element of the 2016 City of Lacey Comprehensive Plan acknowledges the challenges of retail services in the Neighborhood Commercial zoned portion of Horizon Pointe by stating on page 6-3: "The portion of the project that is designated as Neighborhood Commercial has not been developed at this point".

It is only because of the previous Village Center amendment allowing for self-storage that the Neighborhood Commercial zoned property in the Horizon Pointe Village Center has been developed.

The Horizons Planning Area element of the 2016 City of Lacey Comprehensive Plan on page 6-2 reads in part: "There are also designated Neighborhood Commercial areas along College Street and adjacent to the Horizon Pointe development that are intended to serve the neighboring areas."

The conversion of the retail shell to self-storage can be considered consistent with the language on page 6-2 of Comprehensive Plan because the proposed use will serve the neighboring areas with a needed commercial service.

Page 3-12 of the City's Comprehensive Plan contains an acknowledgement for adapting to market conditions to allow a wider mix of land uses to facilitate overall development where there is less demand for traditional retail.

2. The design and improvement of the village center shall generally enhance the development plan, or in any case not have an adverse impact on its physical, visual, or spatial characteristics;

and

3. The design and improvement of the village center shall generally enhance the streetscape and neighborhood, or in any case not have an adverse impact on the streetscape and neighborhood.

Response: Existing and future architectural renderings developed for the project will meet these criteria as follows:

1. City staff considered the physical, visual, and spatial characteristics of the retail shell building and ultimately approved the issuance of building permits for its construction.
2. Impact on the streetscape and residential neighborhood to the west is adequately addressed as follows:
 - A. Existing landscaping along the north property perimeter and existing landscaping within the median and landscape strip along Balustrade Boulevard provides visual screening from the residential uses on the west side of the street.

- B. *The short axis of the current building is oriented toward Balustrade Boulevard which reduces bulk visual impacts.*
- C. *No significant change to the exterior appearance of the building is proposed for the build out of the building shell to self-storage.*
- D. *Vehicular traffic to and from the site will be reduced, as self-storage generates less traffic than retail.*
- E. *Conversion of the existing building to self-storage would not impact pedestrian circulation along the street or into the site.*

In conclusion, the proposed conversion of the retail shell building to self-storage will not detract from the neighborhood design and spatial relationship to the site.

- 3. The modification shall not result in configurations of lots or street systems which shall be impractical or detract from the appearance or functionality of the proposed village center.

Response: This proposal does not affect the configuration of lots or the existing street system. No changes to the Horizon Pointe binding master site plan are proposed.

- 4. The proposed modification shall not result in any danger to the public health, safety, or welfare by making access to the dwellings by emergency vehicles significantly more difficult, by depriving adjoining properties of adequate light and air, or by violating the other purposes for which zoning ordinances are to be enacted.

Response: This proposal will not affect access by emergency vehicles to adjoining properties.

- 5. Design review and other methods shall be used to ensure compliance with the design standards and guidelines of this ordinance.

Response: Final design review prior to issuance of a tenant improvement building permit for conversion from the existing retail shell building will ensure compliance with both the Village Center ordinance and the Horizon Pointe Design Guidelines.

- 6. The minimum lot size of any lot to be created shall not be reduced less than the requirements of this ordinance.

Response: The requested changes to convert the existing retail shell building to self-storage do not affect lot size.

- 7. The landowner shall demonstrate that the proposed modification will allow for equal or better results and represents the minimum modification necessary.

Response: The project proponent has demonstrated a willingness to work with the City and the neighborhood to achieve a successful project by developing a site plan and building designs that fit harmoniously into the Horizon Pointe Master Plan and provides a commercial service that is in demand and complimentary to the surrounding neighborhood.

- 8. The modifications shall not detract from the ability of residents to walk in or through the

village center and their access to public transportation.

Response: The proposed modification does not impact the ability of residents to walk through the Village Center or access public transit.

9. If the City determines that the landowner has met these standards, it may grant a modification of the requirements of this ordinance as part of the normal review process. In granting modifications, the city may impose such conditions as will, in its judgment, secure the objectives and purposes of this ordinance (LMC16.59.030.I).

Response: Acknowledged.

We appreciate the City considering our request.

Sincerely,



Chris Carlson, AICP
Planning Manager