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Seattle Office of Planning and Community Development
Via email to udistrict@seattle.gov

I am writing on behalf of the University District Community Council to offer additional comments on the Seattle Office of Planning and Community Development's sweeping rezone proposal for the University District. As our previous objections to this scheme have fallen almost entirely on deaf ears, you'll have to forgive us if this letter sounds like the work of a frustrated and annoyed organization, because it is.

This proposal and its accompanying "Director's Report" doesn't pass the straight face test. The "thoughtfulness" supposedly engaged-in by OPCD more resembles an exercise in pondering "how can we rezone to give certain powerful special interests what they want while falsely giving City Council the impression that the rezone resulted from a broad-based consensus that reflects neighborhood desires?" In short, OPCD's proposal to drastically increase allowable heights in the U District cannot be logically explained or justified by the reasons given in the Director's report. If substantial changes are not made to this piecemeal approach, the City Council should reject the report and the associated upzone proposal.

Dispelling some of the myths, mischaracterizations, misleading statements, misrepresentations, distortions, and self-serving spin in the Director's Report prepared by the OCPD:

1) The incorrect implication that OPCD closely followed principles from the U District Urban Design Framework (2013) in developing the zoning recommendations. (Executive Summary, p. 4)

- The principles of the U District Urban Design Framework were not closely followed. The upzone proposal actually dismantles the Framework by separating out and ignoring the concurrent adoption of measures to address many of its integral elements.
- Among other things, the 2013 Urban Design Framework contemplated that an upzone would not be considered in isolation; rather it would be part of an integrated package conforming to GMA concurrency requirements.

- This package would include provisions for increased open space, parks, and a large public square - preferably above the new light-rail transit station. The package would also include provisions for enhanced social services, comprehensive transportation and public works infrastructure, public schools and facilities, and other essential elements contributing to livability and the capacity for sustainable growth.
- The City Council should not treat this upzone proposal as severable from the rest of the elements of the U District Urban Design Framework. It must delay consideration of upzones until integral elements of that program are concurrently adopted or funded.

2) The misrepresentation, distortion and incorrect implication that "the proposed zoning would allow a limited number of new towers, up to 240' and 320' ..., [putting] density where there are already tall buildings" (Exec. Sum. P. 4)

- The assertion that putting density where there are "already tall buildings" implies that a significant number of tall buildings currently exist in the U District, that they are located close to each other, and that the areas between them are ripe for redevelopment into much taller structures. All untrue, as an honest analysis in the EIS would have revealed.
- There are presently only three "tall buildings" in the U District. The UW tower at Brooklyn and NE 45th (325') is the tallest. The next tallest is the Deca Hotel, immediately across the street. The third is located in a residential area five blocks east and two blocks north of these two: the University Plaza Condominiums, at 8th Ave. NE & NE 47th.

To the contrary ---the upzone proposal calls for extreme height increases in an approximately 32 block area --- stretching from the alley just east of the UW tower & Deca Hotel up to seven blocks west, and up to five blocks north and south of them. Within these vastly increased height zones are found many newly constructed lower-height (max 65' zoning) projects built since 2012, especially in areas north of NE 45th. These include the AVA Apartments (the entire block between 11th & 12th Ave. NE, south of NE 47th), and the Bridges apartment complex on 11th Ave. NE (developed by UW & Children's Hospital). The blocks north of NE 47th to NE 50th between Roosevelt and Brooklyn already appear to be fully built-out with modern mid-rise buildings, with the exception of the VW auto dealership at Roosevelt and NE 47th.

- For the extreme upzones North of NE 45th, we cannot help but wonder if it is solely to satisfy upzoning auto-dealership land-owners and the landowner of a parking lot at 9th Ave. & NE 45th that OPCD would resort to exaggerating and mischaracterizing the number and whereabouts of existing U District "tall buildings"?
- Likewise, for the extreme upzones south of NE 45th: Is OPCD's motivation to expand and mischaracterize the location of existing tall buildings influenced by the UW's plan (outside the scope of this upzone proposal) to construct numerous new high-rise buildings on its West Campus as part of its next Campus Master Plan? Is it to create a high-rise backdrop where the sweeping height increases likely to be proposed by the UW can now be said to be "consistent" with the surrounding neighborhood?

The UDCC cannot help but arrive at the conclusion that the honest answer to both of these questions is “Yes”.

3) There are other misrepresentations and mischaracterizations in the Director’s Report asserting that the proposal would:

- "Keep heights on the Ave relatively low", helping to "maintain the scale and character that neighbors value."
- Provide "thoughtful transitions" by "stepping height limits and density down from the core to the surroundings." (Exec. Sum. p.4)

OPCD's cleverly parsed phrase "relatively low" relates not to the present-day heights (mostly 2 – 3 stories) on the Ave that neighbors and visitors value, but to relative lowness as compared to the surrounding skyscrapers allowable under the new zoning --- which neighbors decidedly do not want.

(We note that OPCD seemed surprised by the level of hostility it faced at its public meeting to present this proposal on 5/31. If it had not been working with the same small group of people for the last 4 years the anger at this sweeping upzone from the many citizens not engaged in this stage-managed process would not have come as a shock at all. The UDCC cannot help but think that Mayor Murray’s recent Executive Order eliminating DON support for District Councils is designed explicitly to stifle this kind of honest grassroots dissent).

- The proposal would allow 85' heights (from maximum 65' now) along the Ave for four blocks south of NE 45th (until meeting the UW west campus overlay zone) and allow building heights of up to 240' along the eastern Ave Alley fronting on 15th Ave. NE.
- In other areas such as along NE 47th between 8th and the alley west of Roosevelt would "step down" from 320' heights to 35' (SMU-85-320 to LR-1). A 300-foot height difference is quite a gigantic first "step"!

Given the present-day character and nature of the already built environment, "maintaining the scale and character that neighbors value" is contraindicated by the proposal to so drastically raise heights and to so illogically designate height transitions. In addition, the proposal to expand mixed-use zoning north of NE 50th Street and east of 15th Ave NE further indicate that the lip service that OPCD pays to transitions between zones is just that – lip service.

4) The UDCC remains gravely concerned that OPCD has failed utterly to provide a real analysis that quantifies accurately the number of existing low-cost market rate apartment housing units that this proposal will displace, and supports City Councilmember Lisa Herbold’s call for a thorough displacement analysis to take place before such significant upzones are undertaken, and that there MUST be 1-for-1 replacement of any such units lost to the redevelopment that appears to be OPCD’s overarching goal for our neighborhood. We are particularly concerned about the rezone of much of the southwest U-District from lowrise to Midrise, which will surely increase the level of redevelopment and displacement that will occur (and which likely wouldn’t absent this upzone) in a quadrant of our neighborhood that contains so many affordable apartments.

5) The UDCC remains convinced that this plan simply does not create a reasonable amount of public benefit to justify the enormous private wealth that will be created at the stroke of a pen if these upzones are adopted - and the implementation of these upzones before the longstanding goal of siting and funding a centrally-located park/open space has occurred almost certainly ensures that this will never occur.

Moreover, the City of Seattle's unwillingness to even consider the sort of impact fees already allowed under the GMA and that are used by many neighboring jurisdictions speaks volumes about its commitment to ensuring that "growth pays for growth". It hasn't for the past 20+ years since the Comprehensive Plan was adopted, and the current upzone proposal all but assures that these costs will continue to fall on the backs of current Seattle residents (that is, those of us who aren't priced out by a City Government that pays for concurrency with property tax levies and favors upscale new development and affluent newcomers at every turn).

We hope that OPCD will listen to the recommendations of CUCAC, the University Park Community Club, and other community organizations and step back from this process and instead move forward on providing the necessary infrastructure to support this level of growth BEFORE this upzone is implemented.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Fox". The signature is fluid and cursive, with a large initial "M" and a stylized "F".

Matt Fox,
UDCC President

Cc: Seattle City Councilmembers