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UW Office of Planning & Management
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By email to: cmpinfo@uw.edu

Re: Comments: Draft UW Campus Master Plan & EIS

The University District Community Council (UDCC) is a non-profit group that has been active for over 40 years, and is composed of a volunteer board and a diverse membership consisting of people of all ages and backgrounds who live and/or work in the neighborhoods surrounding the University of Washington, and which generally corresponds to what the CMP refers to as the "Primary and Secondary Impact Areas". UDCC's history provides the UDCC with a unique long-term perspective on items of mutual interest for the University and its neighbors, and we have been at the table since the City-University Community Advisory Committee was founded.

UW's announcements about the 2018 Draft Seattle Campus Master Plan (CMP) characterize it as a framework for future development that is "progressive and sustainable" and "balances the preservation of the core campus with the need to accommodate the increasing density." UDCC questions the accuracy of this description. This CMP envisions massive and disruptive growth built upon the rubble of usable present-day campus structures that is inconsistent with the surrounding neighborhoods, and the insensitive and unbalanced takeover of open space, natural areas, and views that unfairly impacts the quality of life for surrounding communities as well as students, faculty and staff. The adverse impacts of this projected demolition activity and new construction are inadequately discussed in the DEIS. Mitigation measures, when mentioned at all, are inadequate to address the adverse impacts of the CMP.

General areas of concern with the CMP and DEIS:

Lack of correlation and sufficient explanation for growth projections. Why does the CMP prescribe 50% or more new net growth when student/faculty staff is projected to grow by 20% or less?

The CMP and the accompanying DEIS fail to supply facts to justify the assumptions about increases in enrollment, faculty, and staff over the next ten years. Where are the figures to justify the prospective increase in enrollees and faculty? Even if the projections are assumed to be accurate, where is the proportionality of increasing gsf with a greater multiplier?

CMP takes an unjustified "give UW a blank check" approach to asking for so much new space.

The CMP identifies nearly another 13 million net gsf of building space (not counting structured parking, which will likely add considerably to this figure). In proposing that 6 million gsf of that occur in the next 10 or so years this also doubles the amount built during the life of the current CMP. The new CMP identifies 85 place-holder building sites, with no stated rationale for their

selection other than that the sites may be buildable for something university-related at some time in the future. This so-called “flexible” approach was adopted for the current CMP, and has resulted in a community fight over the siting of the new UW Police Station that could perhaps have been avoided if there was a more open siting process when the CMP was adopted. It has also resulted in a utility building that has no public access being sited at the south end of the Ave, which ought to have been designated for a use that provided a better linkage to the neighboring street.

The University states that it needs 6 million gsf during the life of this plan, and there is no external check on the validity or necessity of this number (for the record, the UDCC thinks it will impose too much of an impact on the community, if there is any official body interested in that comment). During the adoption of the current CMP, the UW was adamant that it could not build additional student housing, but subsequently reversed course to the point where a number of new dorms were added and almost all of the older (and we note, more affordable) dorm units have been or are now being rebuilt. Conversely, the UW stated that the police station “needed” to have numerous features (as we recall, this included an indoor shooting range) that ultimately fell by the wayside when the budget had to be cut – along with exterior design elements that would likely have helped the building interact better with the surrounding neighborhood.

Open space concepts are vitally important, but CMP proposals lack teeth and commitment. Open space, view corridors, natural areas and breathing room for the thousands of people who will live, work, and congregate in the U District are very important. The CMP's nod toward acknowledging this need is appreciated. But – the provision of open space and protection of natural areas should not be implemented as an afterthought of the CMP, or used as an illusory bait & switch tactic to attract CMP support. This is important in no small part because much of the UW's argument for the “need” to substantially increase zoned heights is based on the promise of providing substantial additional open space in addition to the public park soon to be built as a result of SR 520 project mitigation, but it also acknowledges that the current heights could also yield 3 million gsf in the West Campus (CMP, p.84).

The West Campus Green concept for providing open space in conjunction with a proposed city park is a nice idea, but in itself is insufficient mitigation for the loss of natural areas, open space and views elsewhere, and also does not fill the need for more a centrally located public space in the neighboring parts of the primary impact zone that the UW is also actively working to upzone and develop much more intensely. In addition, successful execution of this concept is speculative and much of it is outside the UW's control. The West Campus Green and the East Campus Land Bridge area, as depicted in artists' renderings, rely not only upon the city's agreement to vacate part of Boat Street (with adverse impacts on parking) and the air space over Montlake Blvd (with construction impacts that would severely impact traffic), but also would require the demolition of several buildings and the relocation of the programs currently housed there. The UDCC has the following specific recommendations:

- The University should develop and seriously consider a viable alternative for the West Campus Green that does not require the vacation of Boat Street
- The CMP and EIS should include a list of the building demolitions/relocations/removal of existing gsf that would be necessary to implement the West Campus Green as proposed.
- There should be an analysis of the effects on existing businesses and potential future park visitors of the proposed vacation of Boat Street.
- The UW should consider and describe how future visitors will access the West Campus Green and the new waterfront park already under construction – particularly given that bus service is already being phased out as the new light rail stations come online (both of these stations are pretty far from this park, and a family can't exactly haul a cooler from either of them for a picnic, nor can a boater bring their vessel on public transit to launch it).

As a prerequisite to the city even considering approving the CMP and the upzones to up to 240', the UW should take substantial steps toward developing the proposed open spaces now. This could include actions such as a realistic plan and schedule for demolishing the Marine Studies Building (School of Marine Affairs) and Wallace Hall (Climate Impacts Group, etc.) and relocating these programs elsewhere. Concurrently file petitions with the city to vacate Boat St and the air space over Montlake Blvd and begin the public process of determining whether such vacations could indeed be accomplished and appropriately mitigated. In other words, the UW's CMP should prioritize providing OPEN SPACE FIRST – as a sign of good faith with the community and as a step toward partially mitigating the impacts of new construction and greater density. In addition, the CMP should include some sort of trigger that limits height increases based on the promise that this open space will be provided if it is not implemented after a certain percentage of the planned square footage has been built, or a similar mechanism that would give teeth to this plan.

The CMP should also specifically identify the University Slough as an environmental asset rather than folding it into the Union Bay Natural Area, and add it to the list of Unique and Significant Landscapes and to the designated Public Realm.

Transportation impacts are given short shrift.

The CMP fails to adequately discuss or mitigate for transportation impacts on the campus and surrounding neighborhoods.

The University hums 24/7. It is faulty to premise an impact study on the pretense that transportation impacts from the University's expansion will occur only during "peak travel periods" and M – F. As it is, travel congestion in the U District is nearly intolerable. Add-in construction workers (whom the EIS exempts from the trip caps and traffic counts), patients visiting the medical center and Roosevelt medical offices, (ditto the count and cap exemptions), streets clogged by dump trucks and heavy construction equipment, busses that cannot pull aside to let traffic pass because the bus-pull-outs have been made into bicycle lanes (which occurred after the traffic studies were conducted for the EIS) – and any reasonable person should see that the UW's desired growth under this Campus Master Plan will not only result in gridlock, it will adversely impact public safety by impairing the ability of Emergency Responders to promptly reach and address emergency situations on campus and in the adjoining NE and NW neighborhoods.

Some of the worst traffic congestion in the Primary Impact zones includes but is not limited to:

1. Montlake Blvd. near the Light Rail Station and Montlake Bridge approach to Hwy 520.
2. NE 45th St. from Laurelhurst/U Village to Interstate 5.
3. NE 50th intersections from 17th Ave. NE to Interstate 5.
4. Roosevelt Way NE from Ravenna to the University Bridge (and the streets such as NE 42nd, NE 45th, and NE 47th that lead from the UW to it)
5. 35th Ave. NE approaching U. Village and NE 45th St.
6. 15th Avenue southbound in the AM commute and northbound during the PM commute (and we note that City now plans to remove peak hour lanes between NE 55th Street and Lake City Way, which will exacerbate existing congestion considerably, and that this was not analyzed in the DCMP or DEIS).

How will the UW mitigate these increasingly adverse impacts? The DEIS should explore more solutions than measures than the transportation management techniques that are currently in use.

The University should also provide better wayfinding signage from the light rail station at Husky Stadium to Metro bus connections. In addition, the CMP should develop firmer plans around how buses will be deployed and routed when the U-District light rail station comes online.

CMP & DEIS improperly gloss- over the insufficiency of utility and public service infrastructure to serve the new growth and density.

Utility infrastructure improvements are needed to serve the new development proposed under the CMP, but are inadequately discussed. For example, existing sewage overflows from city sewers are unmentioned as are mechanisms for preventing additional stress on and under-capacity system. Seattle has been ordered under mechanisms in the Clean Water Act to cease dumping raw sewage into the Ship Canal and Portage Bay when it rains (CSO events), but doesn't have a plan to effect a complete remedy until the year 2030. A deficit of electrical grid and substation capacity was mentioned in the DEIS, but there is little substantive discussion of how and where this will limit new construction, or whether increasing electrical usage to serve an additional 3 Million gsF will overburden the system's capacity to also serve neighborhood growth. Wishful thinking is convenient, but is an unreliable basis for assuring that infrastructure will be ready and available to serve each of the 85 prospective building sites.

And speaking of public facilities:

Additional public toilet facilities are needed to serve people coming to and using areas in and around the UW campus, and the deficit of such facilities has already been documented in the University District Urban Design Framework. UW's increased housing, office space, and labs will add a large number of people to the University District. They have toilet needs too. The University's office towers might be able to meet their needs during regular business hours, but after hours and on weekends, those buildings will be closed off. The need for public toilet facilities will also be unmet for the influx of transit riders to the U District when the Brooklyn Light Rail station opens in 2021, as the plans for that station do not include providing public toilets. The CMP should discuss how to address this need.

Deficient analysis of cumulative Impacts of CMP & U District Upzone

Areas of the U District north of the West and Main Campuses and the area where there are many small businesses and where many students and diverse permanent residents reside will bear the brunt of the adverse impacts of the proposed campus expansion. Four of the five EIS alternatives place the bulk of projected growth on West campus, where streets and public services are largely shared with the surrounding neighborhoods. Why does the EIS lack an alternative (other than the no action alternative) that calls for substantially less growth in West Campus? Why go from "zero to 3 million gsF" in all of the approaches, without analyzing an intermediate growth objective? The UDCC urges the UW to consider other development options in the final CMP that do not focus so much of the new growth in the W. Campus.

Transportation studies demonstrate that major arterials are already overburdened with traffic and congestion. Yet cumulative impacts to and insufficient mitigation measures are described or proposed; perhaps because the DEIS as a whole tends to pretend that the CMP will produce few adverse impacts to the primary and secondary impact zones.

See also discussion, above re: specific transportation comments, and discussion of impacts on infrastructure and public facilities.

Excessive heights and closely packed structure placements adversely impact views, light and air, and aesthetics. They are also inconsistent with both existing and proposed zoning in the surrounding neighborhood.

The CMP's designated "view corridors" are literally too narrow, especially when considered in the context of the canyons of the projected closely spaced towers that will define the streetscapes. This is another area where the DEIS fails to combine and consider the cumulative impacts of the proposed U District Upzone with the CMP. If both are approved as written, many, many places on and off campus where people can now enjoy view of the Cascades, the Olympics, Mount Rainer, the Ship Canal, and Lake Washington, will be eliminated.

- For example, the proposed East Campus development sites would create a street wall that blocks all eye-level views of Lake Washington and most of the mountains from Montlake Blvd.
- A tall structure west of the University Bridge (W-38) would block views of the Ship Canal and Lake Union. The UDCC believes that this should be added to the list of designated view corridors in the CMP and the site should be zoned at a height that does not impede these views.
- The heights for building sites W21 and W22 (as well as the unnamed site to the north of the latter) should remain at 105' to be more consistent with the height limits on University Way. This point is of particular concern to the community, which has repeatedly expressed its support for retaining the pedestrian feel of the Ave.
- Site W30 should be 65' to ensure that it doesn't overwhelm the College Inn (which is designated as a National Historic site).
- Building sites W24 and to a somewhat lesser extent W-25 also affect views that are now public and would form a wall by the neighborhood where there ought to be a gateway. 240' heights are not appropriate in these locations.
- Building sites W-28 and W-29 are projected to be much taller and bulkier than surrounding buildings to the east and to trails and sidewalks. There should be a transition between the Ave sites and taller CMP sites as one gets further south into the core of the W.Campus, and site W-28 and Gould Hall should be reduced significantly from the proposed 240'.
- While the UDCC can support most of the increased heights in the S.Campus, we do not support the current wall of 240' buildings along NE Pacific Street as proposed – greater spacing between them and some mandate that there be a variety of heights needs to be added.
- There is no precedent for the increase in height to 130' along much of the length of Montlake Blvd. Heights of 65' are more consistent with those now found at U-Village and in the surrounding area.
- In the East Campus, at least one (and preferably two) new designated view corridor(s) must be created to preserve water and mountain views if the CMP development of those areas goes forward.

We note that there are numerous locations in the Draft CMP and EIS that show proposed new zoned heights in the areas just outside of the MIO that list the tallest possible height now being proposed by OPCD for those locations. However, the maximum height is based on what will be allowed for more slender residential projects that will also have to provide a number of designated public benefits to achieve those heights. The sort of buildings the UW will be constructing, however, will more like the sort of commercial/office buildings that will be limited to much lower heights – 160 at the tallest, as we understand it. This assumption is used throughout the plan to make the case that the proposed 240' CMP heights are consistent with what is being proposed for the neighborhood, but this is not the case. The maps in the CMP and DEIS must be corrected to list the both elements of the height ranges being proposed by OPCD.

The CMP section on “Departures” on page 229 is inadequate, and as proposed the UW could easily negate the building envelopes proposed in the various development zones, which would far greater bulk and scale than the University is proposing to the community to garner support for and adoption of the new CMP. At the very least, changes of this magnitude should be minor plan amendments that trigger at least some sort of opportunity for public comment and review.

Impacts of "Innovation Districts" differ from traditional university campus uses, and the UW's pursuit of development of such districts is inadequately analyzed and accounted for in the CMP.

The UW appears to justify much of its "need" for new space on its ambition to be the catalyst for an "Innovation District" and industry partner. A number of the CMP's designated development sites,

therefore, are likely to be justifiable on the basis of the expansion of academic or research capacity. Structures used more as commercial office buildings than teaching and research facilities will generate different pedestrian and vehicle traffic, as well as different parking and transit needs. The DEIS fails to adequately quantify and mitigate for these differing uses. In addition, while the UDCC understands the UW position that leaves patients and visitors to the UW Medical Center out of their vehicle trip caps, we do not support adding “partner” or other similar “Innovation District” uses/users to this exemption.

Other observations/comments.

While the UDCC did not oppose the acquisition of the former Safeco Tower by the U of W, there is a long history of the UW expanding into and displacing commercial and residential properties and uses – most recently and notable the acquisition of the market-rate Cavalier Apartments during the current CMP. The UW-led upzone of the U-District that looks to us to be strongly driven by its desire to build high rises on properties it acquired in the Safeco deal gives us serious pause to wonder if removing restrictions on the ability of the U to purchase property in the primary and secondary impact zones during the last CMP process wasn’t a mistake.

Related to this – the UDCC opposes the proposal to vacate NE Northlake Place. The CMP acknowledges that it is not required for the development of site W38 (which, as we state above, should be reduced in size substantially to preserve this important view corridor anyway), and there are still a number of other private sector waterfront/water-dependent businesses in the area that also rely on this street.

The UDCC shares the concerns of the U-District Alliance for Equity and Livability that the CMP does not adequately address the social and economic impacts these plans will have on existing and future UW staff and employees, as well as the lower-income individuals and small businesses in the surrounding neighborhood. We agree with their proposals to address issues such as affordable housing and child care directly through the CMP rather than kicking this problem down the road to the proposed upzones of the U-District through the City’s current process, which offer little or no assurance that the substance of these issues will actually be meaningfully addressed.

One technical correction – the draft CMP cites 35th Ave NE as the Urban Center Boundary, but the EIS for the City of Seattle’s Urban Design Framework/upzone indicates that the Urban Center boundary is 15th Ave NE. The CMP also needs to better distinguish between the higher density Urban Centers and lower intensity development proposed in Urban Villages and other planning areas.

In closing, the UDCC can support many of the height and density increases and much of the campus growth the University of Washington is requesting, but we do have major concerns with the plan as it is now proposed.

We appreciate your attention to these comments and hope that they are reflected in the final proposal.

Matt Fox,
UDCC President