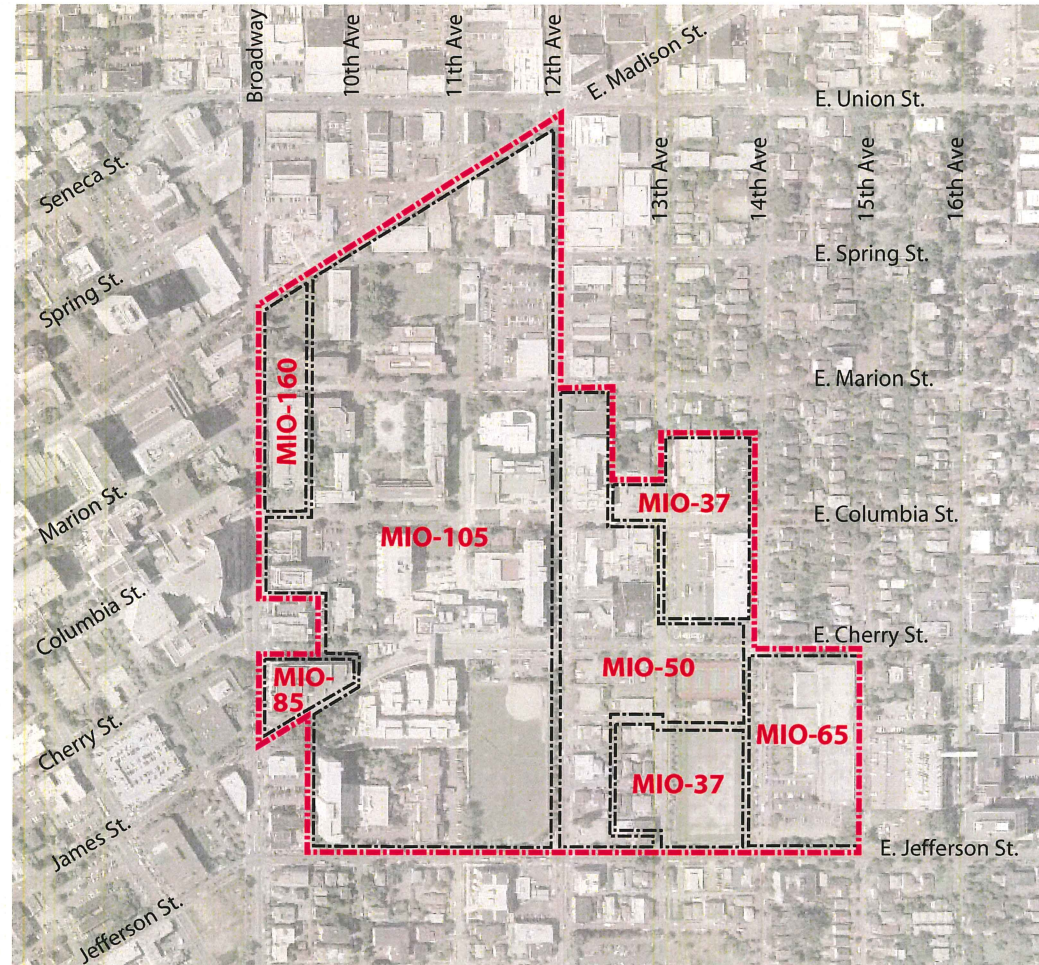


DEVELOPMENT STANDARDS

Existing MIO Boundary and Zoning

This page shows the existing MIO boundary and zoning as approved in the 1997 Major Institution Master Plan. Height limits for the existing site plan range from 37 feet to 160 feet.

The area included within the existing MIO boundary is approximately 3,090,720 sf (70.95 acres) including all public rights-of-way. The parcel area within the MIO boundary (excluding ROW) is 54.9 acres, including both Seattle University and non-university owned land.



- Major Institution Overlay (MIO) zones
- - - Existing MIO boundary

Scale = 1" = 600'








June 2011

Open Space Analysis - Existing Campus



The plan on this page shows the breakdown of open space - both hardscapes and vegetated areas - in terms of function. Open space includes pedestrian and sports hardscapes, pedestrian malls in the vacated streets west of 12th Avenue, athletic fields, lawns, and other landscaped areas. Pedestrian malls serve a primarily pedestrian function but allow for limited vehicle use for maintenance and fire access. The total usable open space of the existing campus is approximately 55%. Areas dedicated to vehicle travel and parking account for another 18% (this does not include existing rights-of-way).

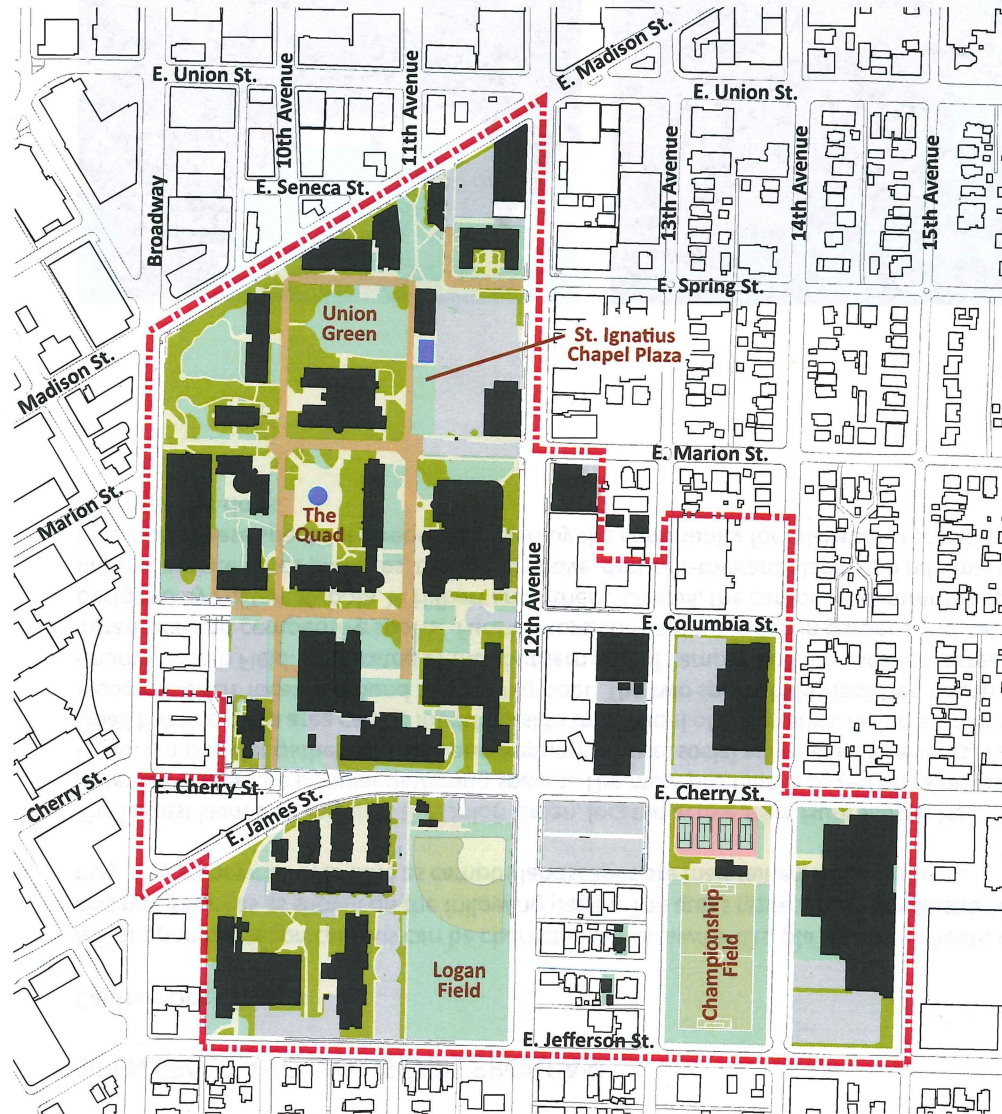
Legend

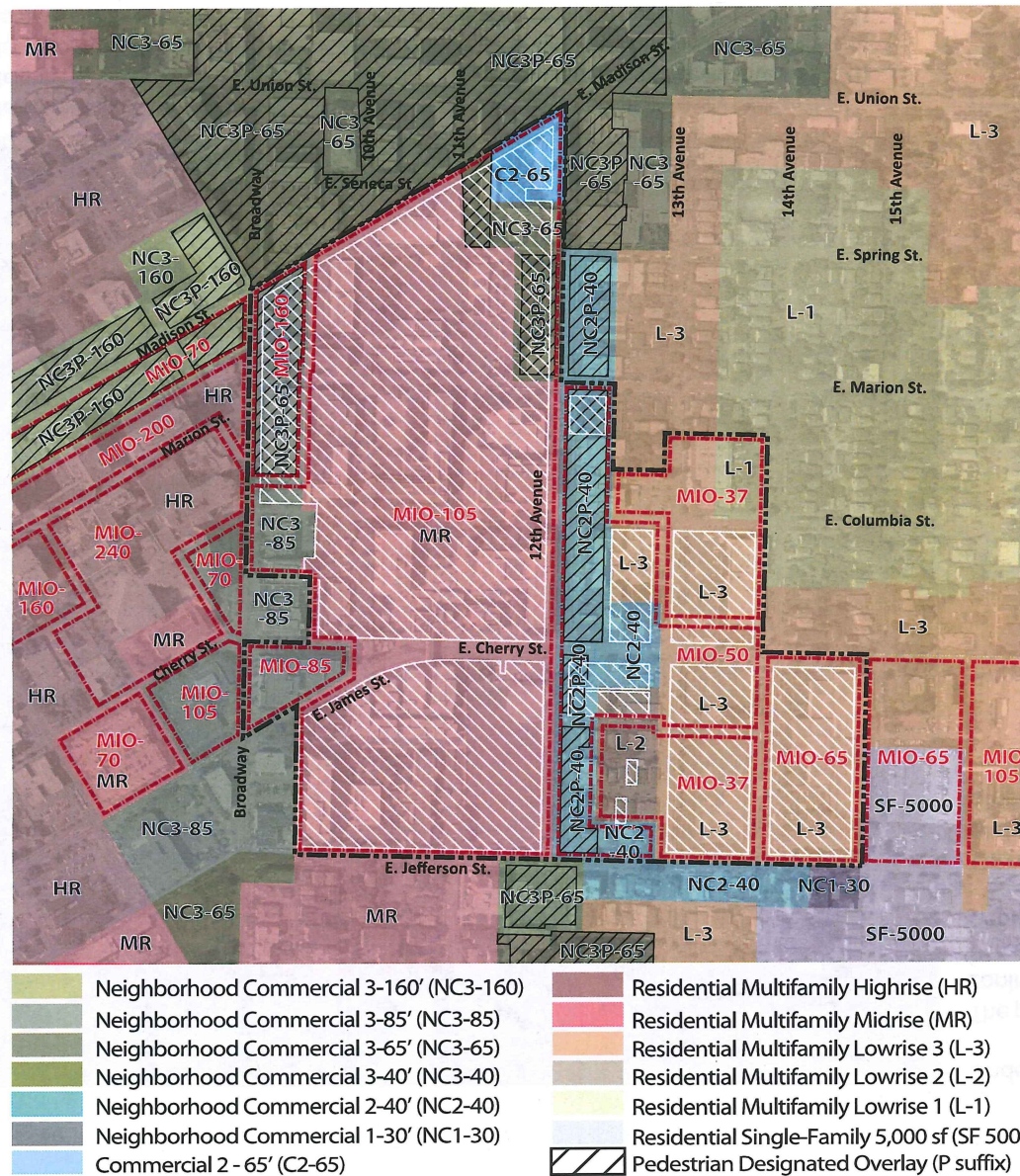
Open Spaces

	14% Landscape Areas
	13% Lawns
	13% Athletic Fields
	11% Pedestrian-Only Hardscapes
	4% Pedestrian Malls

Non-Open Spaces

	27% Buildings
	18% Vehicle Access and Parking



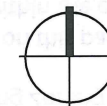


Existing Zoning Plan

The zoning plan on this page shows underlying zones with the existing campus property and existing Major Institution Overlay (MIO) boundaries.

Seattle University owns 48 acres within this area. The underlying zones for the Seattle University area are classified as Residential Multifamily Midrise (MR) for most of the central campus areas, Neighborhood Commercial 3-85 (NC3-85) at the west edge, Commercial 2-65 (C2-65) at the north-east tip, as well as Neighborhood Commercial 2-40 (NC2-40) and Residential Multifamily Lowrise 1, 2, and 3 (L1, L2, L3) at the east edges of campus.

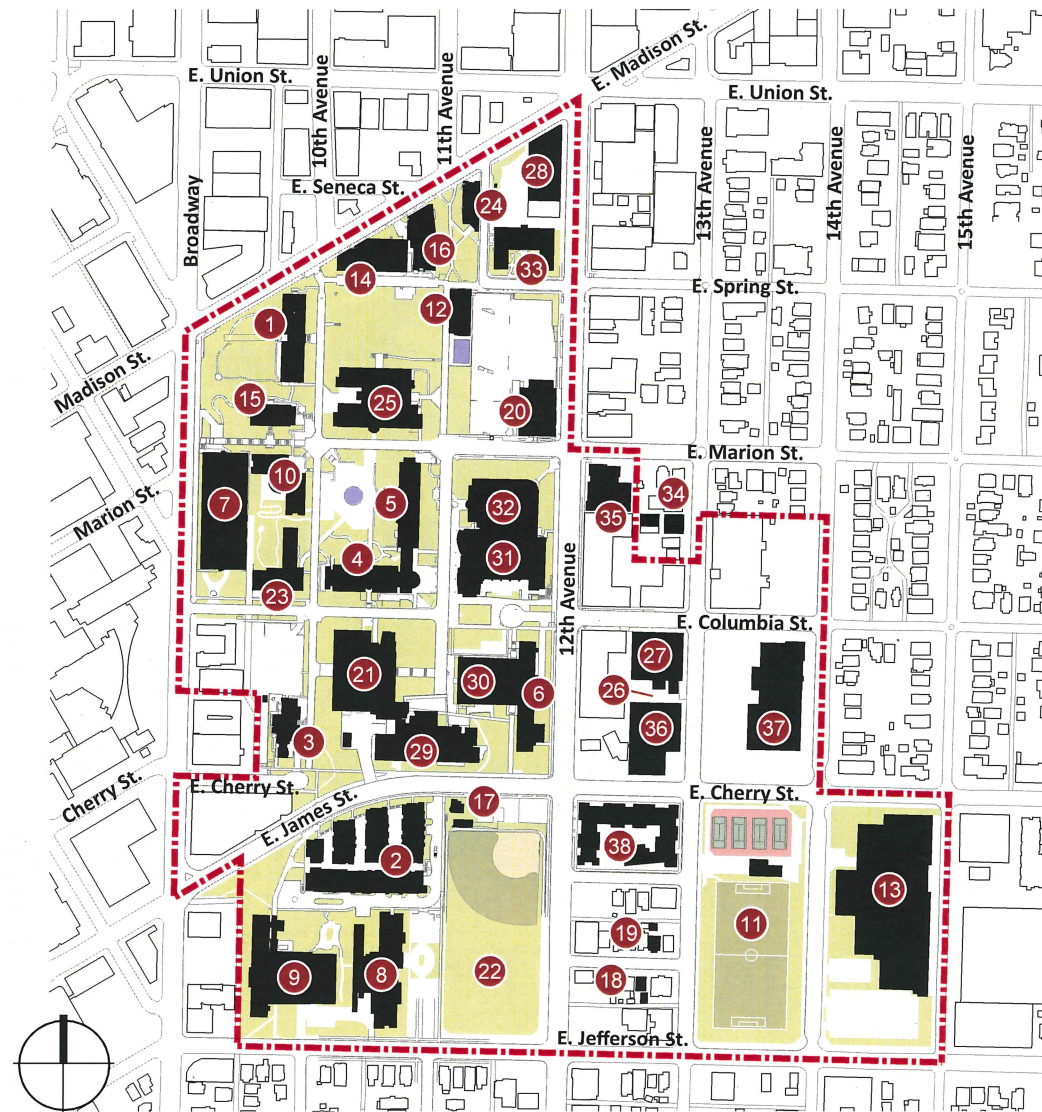
A "P" designation included with any of the NC zoning indicates that specific pedestrian-oriented zoning requirements apply when a parcel fronts on a pedestrian designated street, including E Madison, E Union, Broadway and Broadway East, 10th Avenue, 11th Avenue, 12th Avenue. See the Pedestrian Designated Streets diagram in this section for more information.



- Existing Seattle University MIO Boundary
- Existing MIO Zones (All Institutions)
- Property Owned By Seattle University

- 1 Administration Building
 - 2 Archbishop Murphy Apartments
 - 3 Arrupe Jesuit Residence
 - 4 Engineering Building
 - 5 Bannan Science Building
 - 6 Bellarmine Residence Hall
 - 7 Broadway Garage
 - 8 Teilhard de Chardin Hall
 - 9 Campion Hall
 - 10 Casey Building
 - 11 Championship Field
 - 12 Chapel of St. Ignatius
 - 13 Connolly Center
 - 14 Fine Arts Building
 - 15 Garrand Building
 - 16 Hunthausen Hall
 - 17 James Street Center
 - 18 Kolvenbach 1217
 - 19 Kolvenbach 1220
 - 20 Lee Center for the Arts
 - 21 A.A. Lemieux Library
 - 22 Logan Field
 - 23 Loyola Hall
 - 24 Lynn Building
 - 25 Pigott Building
 - 26 Recycle Yard
 - 27 1215 E Columbia (Seaport Building)
 - 28 Self Storage Building
 - 29 Student Center
 - 30 Student Center Pavilion
 - 31 Sullivan Hall
 - 32 University Services Building
 - 33 Xavier Hall
 - 34 Logan Court
 - 35 824 12th Avenue - Admissions and Alumni Bldg
 - 36 1218 East Cherry Building
 - 37 1313 E Columbia
 - 38 12th and E Cherry Housing
- Existing MIO Boundary

Existing Campus Buildings










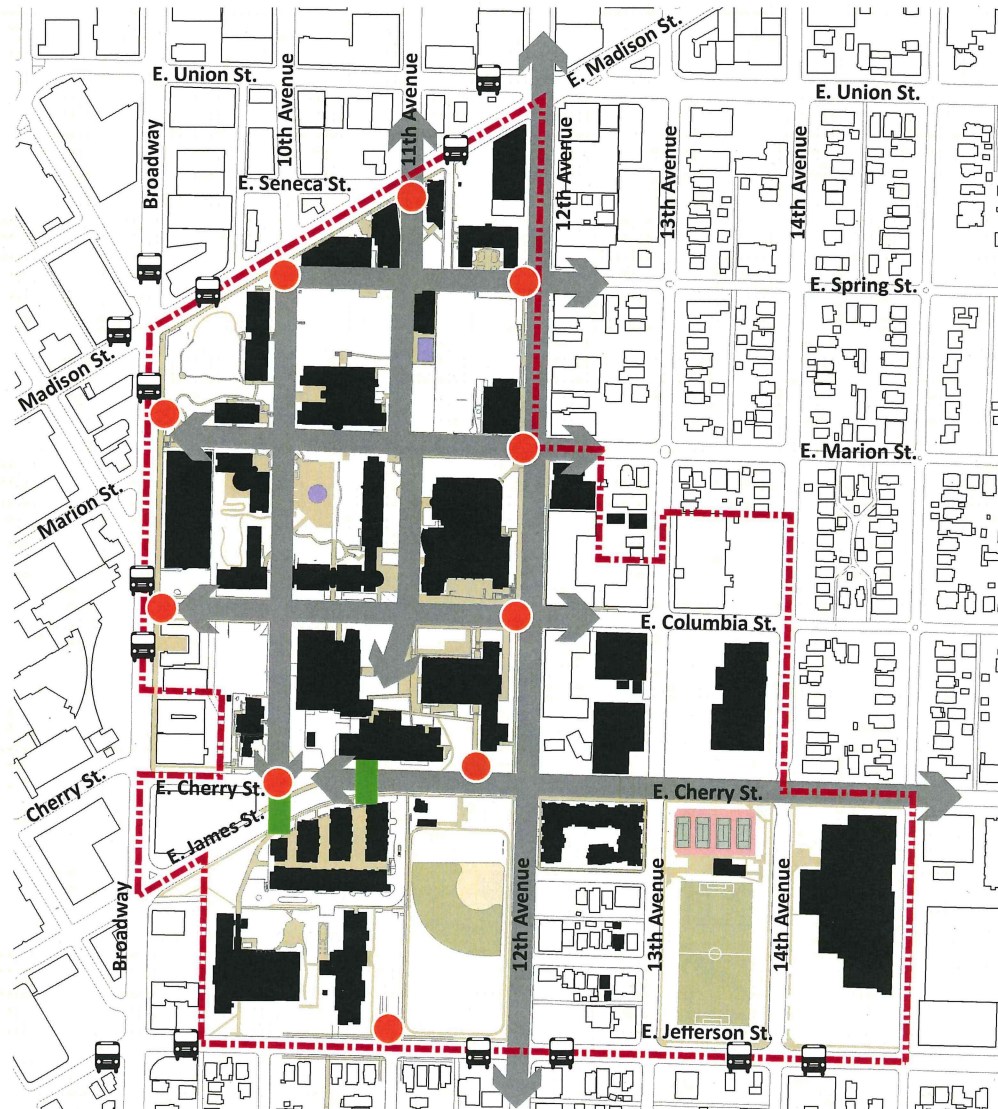
Pedestrian Access for Existing Campus

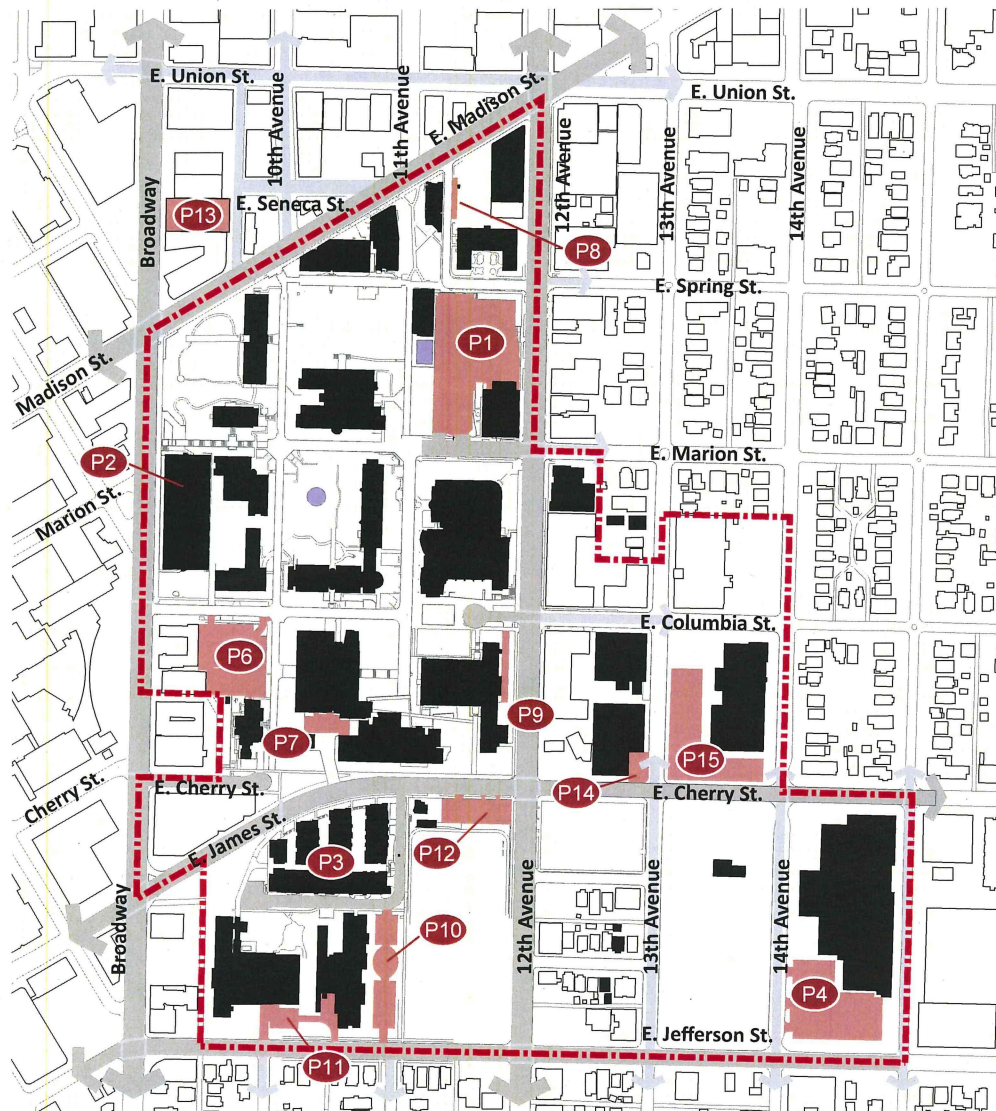
The diagram on this page shows the primary pedestrian access through campus. While on the central campus, it maintains the axially of the original street grid and leads the pedestrian through a series of well landscaped and distinctive outdoor spaces.

Pedestrian connections to the east side of 12th Avenue are less developed. There are several opportunities to make the edges of campus more outward facing and to improve the pedestrian experience along busier streets such as E Madison, 12th Avenue, E Jefferson, and Broadway. More information on this can be found in the Campus & Community Context chapter.

Legend

-  Campus Building
-  Primary Pedestrian Route
-  Other Pedestrian Area
-  Existing Pedestrian Crossing
-  Primary Pedestrian Access
-  METRO Bus Stop
-  Existing MIO Boundary











Existing Parking

- P1 East Marion Lot
- P2 Broadway Garage
- P3 Murphy Garage
- P4 Connolly Center
- P5 *not used*
- P6 Lemieux Library - West
- P7 Lemieux Library - South
- P8 Lynn Building
- P9 Bellarmine
- P10 Teilhard de Chardin Hall
- P11 Campion Hall
- P12 Logan Field
- P13 Broadway Parking Structure
- P14 1218 E Cherry
- P15 1313 E Columbia

Legend






-  Existing Campus Buildings
-  Primary Vehicular Routes
-  Secondary Vehicular Routes
-  Surface Parking
-  Structured or Underground Parking
-  Existing MIO Boundary

Open Space Analysis - Existing Campus



The plan on this page shows the breakdown of open space - both hardscapes and vegetated areas - in terms of function. Open space includes pedestrian and sports hardscapes, pedestrian malls in the vacated streets west of 12th Avenue, athletic fields, lawns, and other landscaped areas. Pedestrian malls serve a primarily pedestrian function but allow for limited vehicle use for maintenance and fire access. The total usable open space of the existing campus is approximately 55%. Areas dedicated to vehicle travel and parking account for another 18% (this does not include existing rights-of-way).

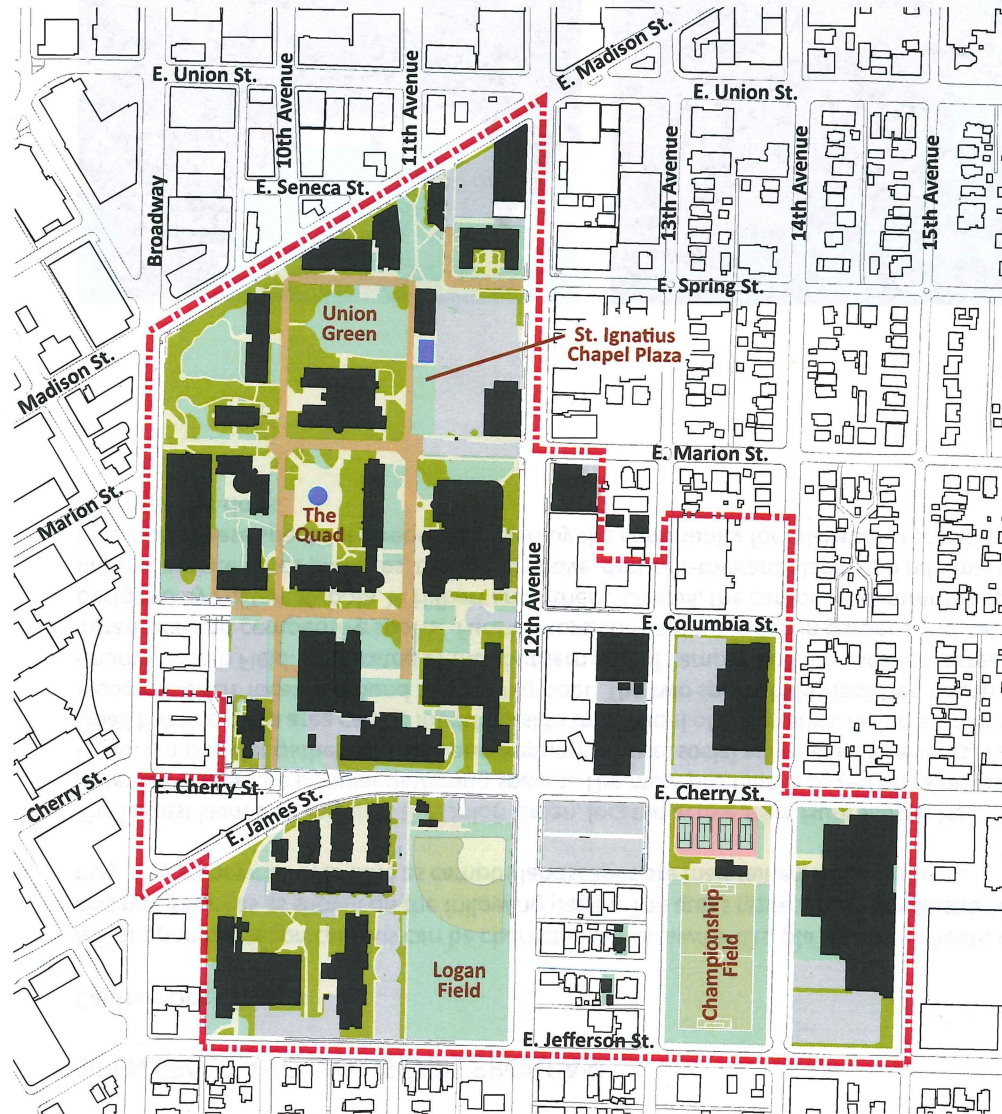
Legend

Open Spaces

	14% Landscape Areas
	13% Lawns
	13% Athletic Fields
	11% Pedestrian-Only Hardscapes
	4% Pedestrian Malls










Non-Open Spaces

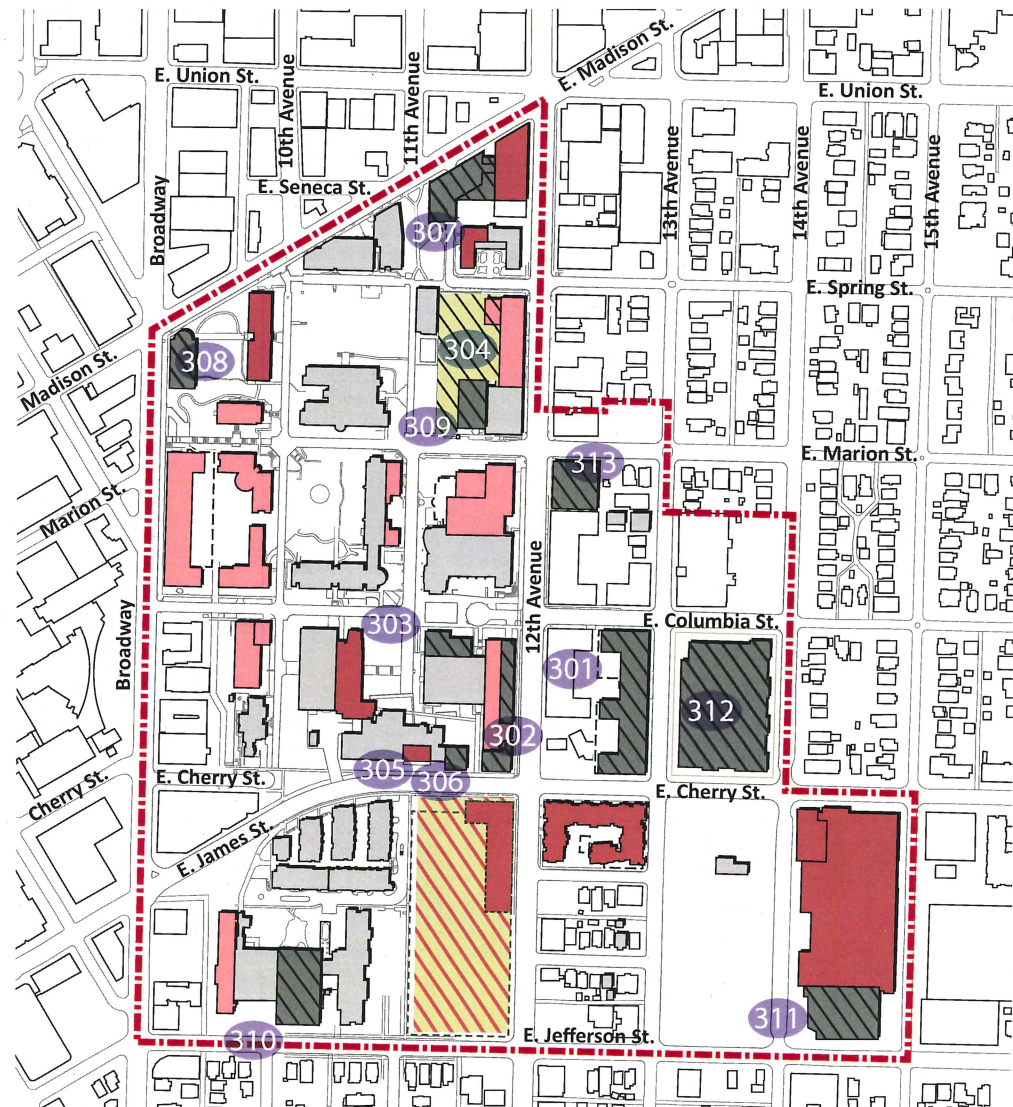
	27% Buildings
	18% Vehicle Access and Parking



Long-Term Plan

Legend






-  Existing Campus Buildings
-  Planned Near-Term Projects and Renovations
-  Planned Near-Term Open Space Above Structured Parking
-  Potential Near-Term Projects and Renovations
-  Potential Long-Term Projects and Renovations
-  Potential Long-Term Open Space Above Structured Parking
-  Buildings to be Demolished
-  Surrounding Buildings
-  Proposed MIO Boundary

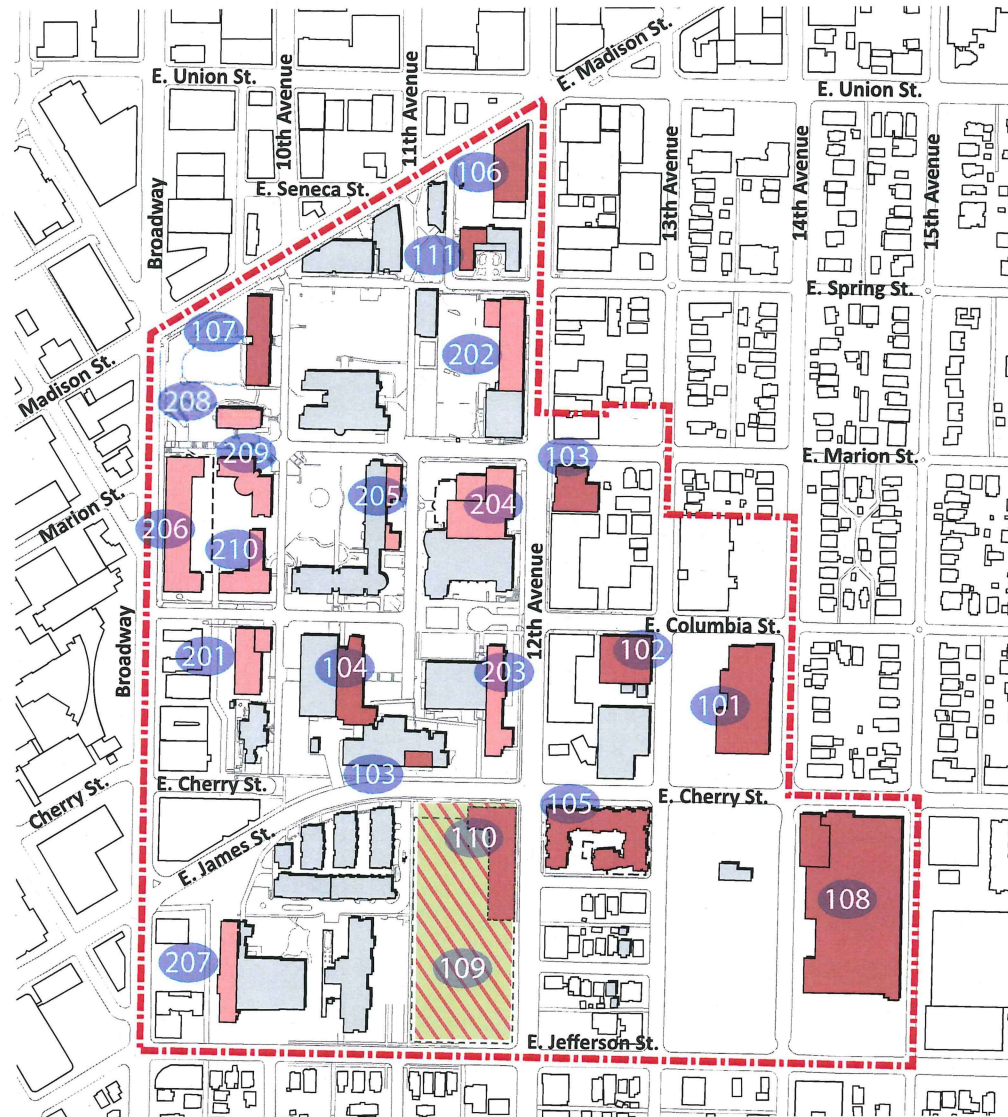


June 2011

Near-Term Plan

Legend

-  Existing Campus Buildings
-  Planned Near-Term Projects and Renovations
-  Planned Near-Term Open Space Above Structured Parking
-  Potential Near-Term Projects and Renovations
-  Buildings to be Demolished
-  Surrounding Buildings
-  Proposed MIO Boundary



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Planned and Potential Near-Term Development Plans

Planned Near Term Projects & Renovations (0-10 years)	Net Additional Square Footage	Proposed Building Height (ft)	New or Renovation	Expected Completion
101 1313 E Columbia Renovation*	0	40	Renovation	2009
102 1215 E Columbia / Academic (Seaport Building) *	5,000	30	Both	2010
103 824 12th Avenue Building (Admissions & Alumni Bldg)*	5,000	15	Both	2009
104 Library Addition *	35,000	40	Both	2010
105 12th & E Cherry Housing *	160,000	50	New	2011
106 Academic & Housing at 12th & E Madison	55,000	105	Both	2011
107 Administration Building (10th & E Madison)	0	45	Renovation	2011
108 Connolly Center at E Cherry & 14th	80,000	40	Both	2011
109 New Logan Field Underground Parking	130,000	40	New	2012
110 New Logan Field Retail	30,000	40	New	2012
111 Xavier Global House	5,000	35	Both	2013
Total New SF	505,000			

* These projects are permitted under the existing 1997 MIMP.

Potential Near Term Projects & Renovations (0-10 years)	Net Additional Square Footage	Proposed Building Height (ft)	New or Renovation	Targeted Completion
201 Academic Building at 10th & E Columbia	100,000	65	New	2011
202 Academic & Housing on 12th Ave & E Spring	95,000	105	New	2012
203 Bellarmine Hall on 12th Ave	0	105	Renovation	2013
204 Academic & Law School Expansion	120,000	75	New	2013
205 Bannan Science	50,000	65	New	2013
206 Columbia and Broadway Building	350,000	160	New	2015
207 Champion Hall Renovation	0	130	Renovation	2014
208 Garrard	0	45	Renovation	2016
209 Casey	0	65	Renovation	2016
210 Loyola	0	55	Renovation	2016
Total New SF	715,000			

Potential Long-Term Development Plans

Potential Long Term Projects & Renovations		Net Additional Square Footage	Proposed Building Height (ft)	New or Renovation	Targeted Completion
301	Student Housing / Office / Mixed Use at 13th Avenue	185,000	65	New	2017
302	12th & E James Retail	15,000	30	New	2018
303	Academic and Student Services, Addition to Student Center Pavilion (11th Avenue & E Columbia Street)	25,000	30	New	2019
304	Green Over Parking	0	n/a	New	2019
305	Student Center (entrance onto E James)	0	n/a	Renovation	2019
306	Student Center	25,000	50	New	2020
307	Academic & Housing on E Madison	75,000	105	New	2020
308	Academic Building at Broadway & E Madison	100,000	65	New	2023
309	Executive Education / Conference & Events (12th Avenue & E Marion Street)	25,000	50	New	2025
310	Campion Ballroom	20,000	40	New	2026
311	Addition to Connolly Center	85,000	65	New	2026
312	1313 E Columbia	280,000	65	New	2027
313	824 12th Avenue	90,000	65	New	2027
Total New SF		925,000			

Total Developed Area by Phase		Net Additional Square Footage	Date Range
100's	Planned Near-Term Projects and Renovations	505,000	2009 to 2013
200's	Potential Near-Term Projects and Renovations	715,000	2011 to 2016
300's	Potential Long-Term Projects and Renovations	925,000	2017 to 2027
Total Proposed Development		2,145,000	

Potential Long-Term Development Plans

Potential Long Term Projects & Renovations		Net Additional Square Footage	Proposed Building Height (ft)	New or Renovation	Targeted Completion
301	Student Housing / Office / Mixed Use at 13th Avenue	185,000	65	New	2017
302	12th & E James Retail	15,000	30	New	2018
303	Academic and Student Services, Addition to Student Center Pavilion (11th Avenue & E Columbia Street)	25,000	30	New	2019
304	Green Over Parking	0	n/a	New	2019
305	Student Center (entrance onto E James)	0	n/a	Renovation	2019
306	Student Center	25,000	50	New	2020
307	Academic & Housing on E Madison	75,000	105	New	2020
308	Academic Building at Broadway & E Madison	100,000	65	New	2023
309	Executive Education / Conference & Events (12th Avenue & E Marion Street)	25,000	50	New	2025
310	Campion Ballroom	20,000	40	New	2026
311	Addition to Connolly Center	85,000	65	New	2026
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Total New SF		925,000			

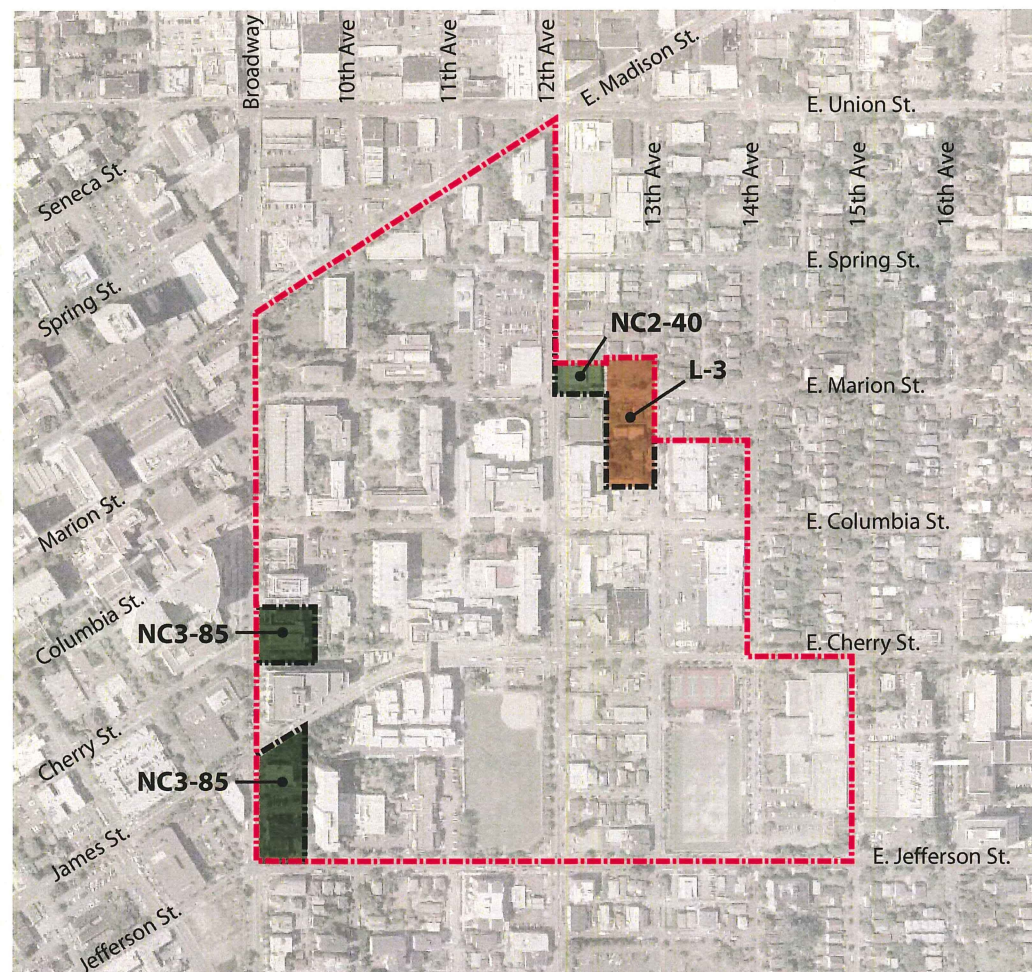
Total Developed Area by Phase		Net Additional Square Footage	Date Range
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200's	Potential Near-Term Projects and Renovations	715,000	2011 to 2016
300's	Potential Long-Term Projects and Renovations	925,000	2017 to 2027
Total Proposed Development		2,145,000	

Proposed MIO Boundary Expansion

The plan on this page shows the existing Major Institution Overlay (MIO) zones along with the expanded MIO District boundary. Seattle University proposes this expansion of the MIO boundary to allow flexibility and the opportunity for partnerships for future growth and development. By expanding the MIO boundary, Seattle University will have the opportunity to help the neighborhood create a more vital and engaged urban village.

Proposed MIO adjustments are shown for an area centered on E Marion Street between 12th Avenue and 13th Avenue as well as two areas along Broadway between E Columbia Street and E Jefferson Street. The underlying zoning for these areas is called out on the plan.

The area included within the proposed MIO boundary is approximately 3,264,943 sf (74.95 acres) including all public rights-of-way. The parcel area within the proposed MIO boundary (excluding ROW) is 56.9 acres, including both Seattle University and non-SU owned land. This is a 2.0 acre increase (3.6%) over the existing parcel area within the MIO boundary.



- Existing MIO boundary
- - - Proposed MIO boundary

Scale = 1" = 600'

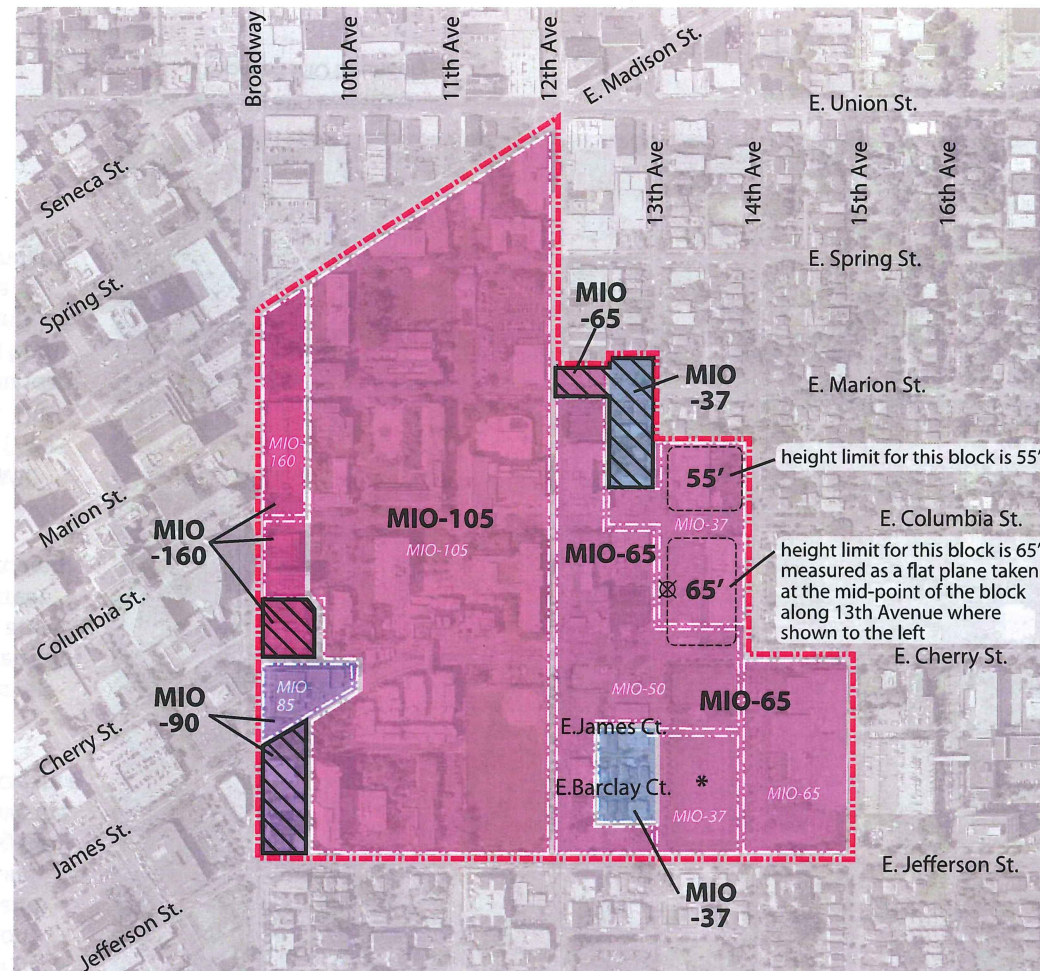


Proposed Building Height Limits

This plan shows the proposed MIO zoning in solid colors and the existing MIO zoning with white boundaries and text. New MIO heights are proposed along Broadway between E Cherry Street and E Columbia Street as well as between E Marion Street and E Jefferson Street along the eastern portions of campus.

The proposed height change is intended to provide a buffer from the higher-density hospital properties along Broadway as well as the flexibility to implement mixed-use (retail, academic, and housing) development east of 12th Avenue. Much of the area surrounding E James and E Barclay Courts has been retained as MIO-37 to help maintain the small scale feel of these two blocks. The specific height recommendations east of 13th Avenue between E Marion and E Cherry Streets were designed to provide flexibility for future university development while mitigating some of the height concerns posed by neighboring residents.

Buildings with academic uses are now averaging larger floor-to-floor dimensions than in the past to allow for a more flexible structure, the demands of information technology, and sustainable features. Emerging building types that support a range of sustainable features are frequently taller and narrower. This allows for greater availability of natural light and ventilation, improving occupant well-being and decreasing heating and cooling loads, as well as preserving more open space adjacent to the building.



- Existing MIO Boundary
- Existing MIO Zoning Designation
- Proposed MIO Boundary
- Proposed MIO Zoning Designation
- MIO Boundary Expansion Areas

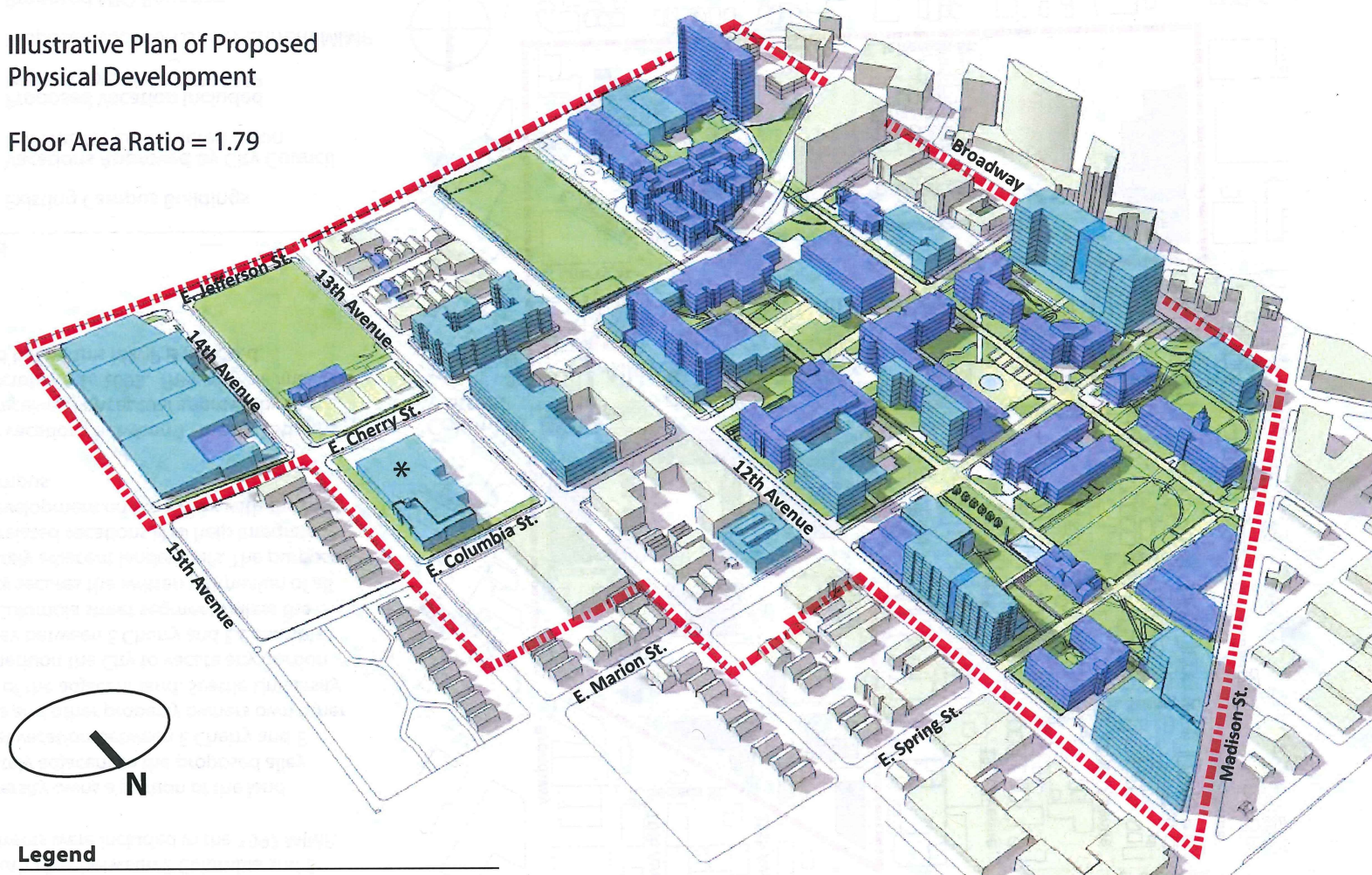
* Lights associated with sports field allowable up to 105' height limit.

Scale = 1" = 600'



Illustrative Plan of Proposed Physical Development

Floor Area Ratio = 1.79



Legend

- Surrounding Buildings
- Existing Campus Buildings
- Proposed New and Renovated Buildings
- Proposed MIO Boundary

* For potential projects at this location, refer to the Long-Term Plan for the 1313 E Columbia Site in this section

D. POTENTIAL SIGNIFICANT ADVERSE ENVIRONMENTAL IMPACTS & MITIGATION

The following table summarizes the potential significant adverse environmental impacts and mitigation measures identified in this environmental analysis. It is not intended to be a substitute for the complete discussion of each element that is contained in *Section III*.

3.1 AIR AND GLOBAL CLIMATE CHANGE					
Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action Alternative
Impacts <u>Air</u> No significant air quality problems would be expected at any locations as a result of the Proposed Action. <u>Global Climate Change</u> Based upon the calculations from the SEPA GHG Emissions worksheet, the Proposed Action would generate 4,164,066 MTCO ₂ e additional GHG emissions (over Existing Conditions) anticipated during the lifespan of the building development (65 years). Mitigation Measures <u>Air</u> No significant air quality impacts have been identified and no mitigation measures are proposed. <u>Global Climate Change</u> Some examples of how the University is planning to reduce greenhouse gas emissions include: reducing student commuter traffic, addressing operational issues include increasing efficiencies in heating and cooling systems, installing high-efficiency water and lighting fixtures, reusing existing buildings, maximizing daylight within buildings, and installing raingardens to manage stormwater on site.	Impacts <u>Air</u> Air Quality impacts for Alternative 1 would be the same as for the Proposed Action. <u>Global Climate Change</u> Based upon the calculations from the SEPA GHG Emissions worksheet, Alternative 1 would generate 1,809,597 MTCO ₂ e additional GHG emissions (over Existing Conditions) anticipated during the lifespan of the building development (65 years). Mitigation Measures <u>Air</u> Measures would be the same as those proposed for the Proposed Action. <u>Global Climate Change</u> Measures would be the same as those proposed for the Proposed Action.	Impacts <u>Air</u> Air Quality impacts for Alternative 2 would be the same as for the Proposed Action. <u>Global Climate Change</u> Based upon the calculations from the SEPA GHG Emissions worksheet, the Alternative 2 would generate 4,164,066 MTCO ₂ e additional GHG emissions (over Existing Conditions) anticipated during the lifespan of the building development (65 years). Mitigation Measures <u>Air</u> Measures would be the same as those proposed for the Proposed Action. <u>Global Climate Change</u> Measures would be the same as those proposed for the Proposed Action.	Impacts <u>Air</u> Air Quality impacts for Alternative 3 would be the same as for the Proposed Action. <u>Global Climate Change</u> Based upon the calculations from the SEPA GHG Emissions worksheet, the Proposed Action would generate 4,164,066 MTCO ₂ e additional GHG emissions (over Existing Conditions) anticipated during the lifespan of the building development (65 years). Mitigation Measures <u>Air</u> Measures would be the same as those proposed for the Proposed Action. <u>Global Climate Change</u> Measures would be the same as those proposed for the Proposed Action.	Impacts <u>Air</u> Air Quality impacts for Alternative 4 would be the same as for the Proposed Action. <u>Global Climate Change</u> Based upon the calculations from the SEPA GHG Emissions worksheet, the Proposed Action would generate 4,164,066 MTCO ₂ e additional GHG emissions (over Existing Conditions) anticipated during the lifespan of the building development (65 years). Mitigation Measures <u>Air</u> Measures would be the same as those proposed for the Proposed Action. <u>Global Climate Change</u> Measures would be the same as those proposed for the Proposed Action.	Impacts <u>Air</u> No new air quality impacts would be associated with the No Action Alternative. <u>Global Climate Change</u> No new GHG emissions would result as part of the No Action Alternative. Mitigation Measures <u>Air</u> No significant air quality impacts would be associated with the No Action Alternative and no mitigation measures are proposed. <u>Global Climate Change</u> No mitigation measures are proposed for the No Action Alternative.

3.2 PLANTS					
Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action Alternative
<p>Impacts</p> <p>Redevelopment construction activities would occur adjacent to or within areas where gardens and/or significant trees are currently located resulting in impacts to or displacement of trees or plant communities. Until final design is completed for specific <i>MIMP</i> projects, the specific impacts to any particular plant resources would not be known.</p> <p>Mitigation Measures</p> <p>Where feasible, siting in conjunction with building remodeling and/or new construction associated with planned or potential projects would attempt to avoid conflicts with significant trees and groves.</p> <p>Trees that must be removed to accommodate planned or potential projects would be replaced consistent with provisions of Chapter 25.11 (SMC) and the adopted Director's Rule that implements DMC 25.11.</p> <p>A temporary topsoil erosion and sedimentation control plan and a drainage control plan would be implemented to mitigate construction-related impacts.</p> <p>Landscaped areas affected by construction staging or parking would be restored to their existing condition or better following construction.</p>	<p>Impacts</p> <p>Impacts to trees and plant communities for <i>Alternative 1</i> would be the same as for the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p>Measures would be the same as those proposed for the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Impacts to trees and plant communities for <i>Alternative 2</i> would be the same as for the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p>Measures would be the same as those proposed for the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Impacts to trees and plant communities for <i>Alternative 3</i> would be the same as for the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p>Measures would be the same as those proposed for the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Impacts to trees and plant communities for <i>Alternative 4</i> would be the same as for the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p>Measures would be the same as those proposed for the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>No impacts to trees and plant communities would be assumed for the <i>No Action Alternative</i>.</p> <p>Mitigation Measures</p> <p>No impacts to trees and plant communities would be assumed for the <i>No Action Alternative</i>; therefore, no mitigation measures are proposed.</p>

3.3 ENVIRONMENTAL HEALTH AND NOISE

Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action Alternative
<p>Impacts</p> <p><u>Environmental Health</u> Redevelopment activities associated with the <i>Proposed Action</i> at the 1223 E. Cherry Street could result in direct contact with contaminated building materials, soils and groundwater, if not remediated.</p> <p>Unanticipated contamination could be discovered during construction activities associated with the <i>Proposed Action</i>, such as asbestos-containing materials and/or lead-based paints in buildings and underground heating oil tanks.</p> <p><u>Noise</u> Increases in traffic volumes on area roadways under the <i>Proposed Action</i> would be expected to result in discernable noise increases; therefore, no significant noise impacts are anticipated.</p> <p>Certain elements of the Proposed Action have the potential to result in noise impacts at nearby residential and noise-sensitive commercial receivers. These elements could include noise from noise from proposed parking garages ventilation equipment, building HVAC equipment, and noise from dormitories (voices, music, etc.).</p> <p>Mitigation Measures</p> <p><u>Environmental Health</u> Seattle University has prepared a Cleanup Action Plan (CAP) for the remediation or removal of contaminants on the 1223 East Cherry St. site. Cleanup activities associated with the <i>Proposed Action</i> would be performed in compliance with the CAP.</p>	<p>Impacts</p> <p><u>Environmental Health</u> Environmental Health impacts for <i>Alternative 1</i> would be the similar to those for the <i>Proposed Action</i>, except the housing project at 1223 E. Cherry Street may not be developed under this Alternative.</p> <p><u>Noise</u> Noise impacts associated with <i>Alternative 1</i> would be similar to the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p><u>Environmental Health</u> Measures would be the same as those proposed for the <i>Proposed Action</i>, except the housing project at 1223 E. Cherry Street may not be developed under this Alternative.</p>	<p>Impacts</p> <p><u>Environmental Health</u> Environmental Health impacts for <i>Alternative 2</i> would be the similar to those for the <i>Proposed Action</i>.</p> <p><u>Noise</u> Noise impacts associated with <i>Alternative 2</i> would be similar to the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p><u>Environmental Health</u> Measures would be the same as those proposed for the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p><u>Environmental Health</u> Environmental Health impacts for <i>Alternative 3</i> would be the similar to those for the <i>Proposed Action</i>.</p> <p><u>Noise</u> Noise impacts associated with <i>Alternative 3</i> would be similar to the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p><u>Environmental Health</u> Measures would be the same as those proposed for the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p><u>Environmental Health</u> Environmental Health impacts for <i>Alternative 4</i> would be the similar to those for the <i>Proposed Action</i>.</p> <p><u>Noise</u> Noise impacts associated with <i>Alternative 4</i> would be similar to the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p><u>Environmental Health</u> Measures would be the same as those proposed for the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p><u>Environmental Health</u> No new environmental health impacts would be associated with the <i>No Action Alternative</i>.</p> <p><u>Noise</u> No noise impacts would be assumed under the <i>No Action Alternative</i>.</p> <p>Mitigation Measures</p> <p><u>Environmental Health</u> No mitigation measures are assumed under the <i>No Action Alternative</i>.</p>

3.3 ENVIRONMENTAL HEALTH AND NOISE					
Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action Alternative
<p>Seattle University would complete pre-demolition surveys and applicable asbestos and/or lead abatement activities where required by local, state and federal air quality or worker safety regulations, prior to any construction activities.</p> <p>Seattle University would comply with release reporting, investigation and applicable cleanup provisions of the MTCA regulations for any new contamination discovered during construction activities.</p> <p>Seattle University would perform follow-up testing of the groundwater in the Utility Pole Storage Area on the 1313 East Columbia St. site following removal of the utility poles.</p> <p><u>Noise</u> To minimize noise impacts associated with HVAC and air handling equipment, such equipment should be selected and positioned to maximize noise reduction to the extent possible. When conducting analyses to ensure compliance with the Seattle noise limits, facility designers should assess sound levels as they relate to the nearest residential zones.</p> <p>With regard to garbage and recycling collection associated with the new student housing facilities, the University should, to the extent feasible, design the collection areas to minimize or eliminate line-of-site to nearby sensitive receivers. In addition, the University should work with the collection vendors to schedule collections at appropriate (i.e., least intrusive) times.</p>	<p><u>Noise</u> Measures would be the same as those proposed for the <i>Proposed Action</i>.</p>	<p><u>Noise</u> Measures would be the same as those proposed for the <i>Proposed Action</i>.</p>	<p><u>Noise</u> Measures would be the same as those proposed for the <i>Proposed Action</i>.</p>	<p><u>Noise</u> Measures would be the same as those proposed for the <i>Proposed Action</i>.</p>	<p><u>Noise</u> No mitigation measures are assumed under the <i>No Action Alternative</i>.</p>

3.4 LAND USE					
Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action Alternative
<p>Impacts</p> <p>Full implementation of the MIMP would involve new construction and/or additions/renovation to approximately 34 buildings and facilities over the 20-year time period. The total net additional square footage proposed by the MIMP would be approximately 2,145,000 square feet over that time frame. Development on-campus would contain uses and functions that support the mission of the University (i.e. academic uses, student support, student housing, and administrative space) or are functionally – integrated with Seattle University.</p> <p>Implementation of the MIMP would result in the intensification of uses on-campus as a result of new building development, remodeling and intensifying development associated with existing buildings, and the modification and addition of parking areas.</p> <p>The pattern and types of land uses on campus would not change significantly under the <i>Proposed Action</i>; however, building density and building heights would likely change in some areas including increased height limits in some areas.</p>	<p>Impacts</p> <p>Land use impacts related to campus development under <i>Alternative 1</i> would be similar to those described under the <i>Proposed Action</i>. Building density in areas where student housing projects were proposed would likely be lower than under the <i>Proposed Action</i>.</p> <p>No increase in on-campus housing under <i>Alternative 1</i> would also result in an increased demand for off-campus housing in the vicinity of campus.</p> <p>The increased number of students living off campus would result in an increased number of student trips to and from campus for classes and other activities.</p>	<p>Impacts</p> <p>Land use impacts under <i>Alternative 2</i> would be similar to those described under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Land use impacts from development under <i>Alternative 3</i> would be similar to those described under the <i>Proposed Action</i> due to the similar nature of the development programs. The elimination of the MIO boundary expansion would preclude more unified development from potentially occurring in the future along Broadway and 12th Ave.</p>	<p>Impacts</p> <p>Under this alternative, no building height increases would occur east of 12th Ave. Campus development would be similar to the <i>Proposed Action</i>; however, building development east of 12th Ave. would meet current building height limitations.</p> <p>Development east of 12th Ave. under <i>Alternative 4</i> would differ from the <i>Proposed Action</i> due to the restriction on height increases. Maintaining existing building heights east of 12th Ave. would allow for lower buildings and would reduce the potential for building mass-related impacts on adjacent properties. In addition, building shadows would be reduced for those properties adjacent to the proposed 13th Ave. building and 1313 E Columbia. However, due to the lower height limits under this alternative, either more intensive on-campus development would be required west of 12th Ave. or further expansion of the University's MIO boundaries would be needed.</p>	<p>Impacts</p> <p>Under the <i>No Action Alternative</i>, no significant land use impacts would occur. Building remodeling would continue to occur in the future as some buildings on-campus could require improvements in order to accommodate the expected enrollment; such projects would not be anticipated to change the overall land use character of the buildings or the campus in general. Existing open space areas would also be more intensely utilized as the on-campus population gradually grows.</p>
<p>Mitigation Measures</p> <p>No mitigation of direct land use impacts would be required for the <i>Proposed Action</i>.</p>	<p>Mitigation Measures</p> <p>No mitigation of direct land use impacts would be required for the <i>Alternative 1</i>.</p>	<p>Mitigation Measures</p> <p>No mitigation of direct land use impacts would be required for the <i>Alternative 2</i>.</p>	<p>Mitigation Measures</p> <p>No mitigation of direct land use impacts would be required for the <i>Alternative 3</i>.</p>	<p>Mitigation Measures</p> <p>No mitigation of direct land use impacts would be required for the <i>Alternative 4</i>.</p>	<p>Mitigation Measures</p> <p>No mitigation of direct land use impacts would be required for the <i>No Action Alternative</i>.</p>

3.5 AESTHETICS					
Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action Alternative
<p>Impacts</p> <p>The amount of development that is planned as part of the <i>Proposed Action</i> would change the aesthetic character of portions of the Seattle University campus by increasing density and building heights. While none of the future buildings have yet been designed, it is proposed that design of these structures consider and address appropriate architectural design guidelines.</p> <p>Each development activity would be expected to improve open space, develop expanded pedestrian access, create a more positive aesthetic experience, and establish better connections with the surrounding neighborhoods.</p> <p>Development that <i>is</i> proposed for the Seattle University campus – in the Near-Term and Long-Term – would have no affect on public view corridors associated with the City's designated parks, viewpoints, view corridors, scenic routes, landmarks, designated historic places or designated views of the Space Needle.</p> <p>Mitigation Measures</p> <p>No significant adverse environmental impacts are anticipated with regard to aesthetics and, therefore, no mitigation is necessary. As noted in this section of the Draft EIS, street-level and upper-level setbacks are proposed to help mitigate bulk and massing of new campus construction adjacent to existing, non-University land uses.</p>	<p>Impacts</p> <p>Aesthetic-related impacts under <i>Alternative 1</i> are not expected to differ substantially from that associated with the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p>Measures would be as described under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Aesthetic-related impacts under <i>Alternative 2</i> are not expected to differ substantially from that associated with the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p>Measures would be as described under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Aesthetic-related impacts under <i>Alternative 3</i> are not expected to differ substantially from that associated with the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p>Measures would be as described under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Under <i>Alternative 4</i>, the development space lost by the height restriction would be recovered by intensifying campus development west of 12th Ave., or by further expanding the University's MIO boundary east of 12th Ave. If the option to intensify campus development west of 12th Ave. were exercised, the height of certain buildings would be increased.</p> <p>This would represent a substantial change in building heights, and the taller buildings would be more visible from locations on and off campus. If the option to expand the MIO boundary east of 12th Ave. were exercised, new campus development could be expected in this area.</p> <p>In addition, most of the development currently identified under the <i>Proposed Action</i> would continue, resulting in similar aesthetic-related impacts for the majority of the campus.</p> <p>Mitigation Measures</p> <p>Measures would be as described under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Under the <i>No Action Alternative</i>, no new building development and minimal growth in campus population would occur. The aesthetic character of the campus would remain as described under existing conditions.</p> <p>Mitigation Measures</p> <p>No mitigation measures would be assumed under the <i>No Action Alternative</i>.</p>

3.6 LIGHT, GLARE AND SHADOWS					
Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action Alternative
<p>Impacts</p> <p>Development under the <i>Proposed Action</i> would result in additional light associated with stationary and mobile sources including interior and exterior building lighting, security lighting, and additions to pedestrian lighting. Additional vehicular traffic would result in additional light from vehicles entering and exiting the campus. It is anticipated that light emanating from new development on the campus would be similar to existing development on-campus.</p> <p>The primary sources of glare from the <i>Proposed Action</i> would be direct glare from lighting sources (i.e. building, security, and field lighting) and reflective solar glare from specular surfaces (i.e. glazing, luminaire housings, athletic field surfaces).</p> <p>Development under the MIMP would cast shadows that would be generally similar to those produced from existing campus buildings. No significant shadow-related impacts are anticipated from the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p>Light and glare standards proposed in the <i>MIMP</i> would help guide lighting design to minimize potential offsite impacts including luminaire specifications, lighting locations, light distribution, aiming angles and mounting heights.</p> <p>Building design could consider the use of less reflective glazing materials to minimize the potential glare impacts to offsite uses.</p> <p>Future new building design could consider the final orientation and massing of the building to minimize the potential shadow impacts to campus resources and offsite uses.</p>	<p>Impacts</p> <p>Potential light and glare impacts under <i>Alternative 1</i> would be similar to those described under the <i>Proposed Action</i>. Potential shadow impacts under <i>Alternative 1</i> would be similar in nature, but less than those described under the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p>Measures would be as described under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Potential light, glare and shadow impacts under <i>Alternative 2</i> would be similar to those described under the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p>Measures would be as described under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Potential light, glare and shadow impacts under <i>Alternative 3</i> would be similar to those described under the <i>Proposed Action</i>.</p> <p>Mitigation Measures</p> <p>Measures would be as described under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p><i>Alternative 4</i> would result in lower building heights east of 12th Ave. when compared to the <i>Proposed Action</i>, resulting in lower building intensity and lower associated levels of light, glare and shadows in this area. In order to compensate for no height increases east of 12th Ave., either more intensive on-campus development would be necessary west of 12th Ave. or further expansion of the MIO boundary would be required resulting in an associated increase in light, glare and shadows.</p> <p>Mitigation Measures</p> <p>Measures would be as described under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>No new light, glare or shadow impacts would be assumed under the <i>No Action Alternative</i>.</p> <p>Mitigation Measures</p> <p>No mitigation measures would be assumed under the <i>No Action Alternative</i>.</p>

3.7 HISTORIC RESOURCES					
Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action Alternative
<p>Impacts</p> <p>Five projects assumed under the <i>Proposed Action</i> involve potential removal of structures that meet a 40-yr. age criterion (see <i>Section 3.7</i>) including the University Services Building (1946), Seaport Building (1920), 1218 E. Cherry Building (1937) Lynn Building (1926) and the 1313 E. Columbia Building (1939).</p> <p>The 1313 E. Columbia Building is currently under consideration as a City Landmark. The structure has been designated and the Seattle City Council is anticipated to pass an ordinance regarding its designation in Spring 2010. Before alternations or significant changes can be made to the site or exterior of this building, a Certificate of Approval from the City of Seattle Landmark's Preservation Board.</p>	<p>Impacts</p> <p>Under <i>Alternative 1</i>, it is assumed that Seattle University would continue to have increased growth comparable to the <i>Proposed Action</i>; however, no additional student housing would be provided. Two of the Long-Term projects include housing that also involve removal of existing campus buildings (e.g., Lynn, Seaport, and 1218 E. Cherry Buildings). While these existing structures would not be removed for housing, conceivably they could still be replaced with for other campus uses.</p>	<p>Impacts</p> <p>Impacts under <i>Alternative 2</i> would be similar to the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Impacts under <i>Alternative 3</i> would be similar to the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>In order to accommodate the development needs of Seattle University without additional building height increases east of 12th Ave., development in new MIO Boundary Expansion areas east of 12th Ave. would be required. These areas include the location of buildings more than 40 years old that could potentially be determined to be historic.</p> <p>The area of development under this <i>Alternative</i> would be greater than that of the <i>Proposed Action</i> and potential impacts to historic resources under <i>Alternative 4</i> would be expected to be greater than those described under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Under the <i>No Action Alternative</i>, no new building development and minimal growth in campus population would occur. Historic resources on campus would remain as described under existing conditions.</p>
<p>Mitigation Measures</p> <p>As described earlier, historical analysis (Appendix A) would be required for demolition or alteration under the <i>Proposed Action</i> of any structure that is 50 years old or older. That analysis would be required at the time of submittal of the Master Use Permit for the replacement project.</p>	<p>Mitigation Measures</p> <p>Mitigation measures under <i>Alternative 1</i> would be similar to the <i>Proposed Action</i>.</p>	<p>Mitigation Measures</p> <p>Mitigation measures under <i>Alternative 2</i> would be similar to the <i>Proposed Action</i>.</p>	<p>Mitigation Measures</p> <p>Mitigation measures under <i>Alternative 3</i> would be similar to the <i>Proposed Action</i>.</p>	<p>Mitigation Measures</p> <p>Mitigation measures under <i>Alternative 4</i> would be similar to the <i>Proposed Action</i>.</p>	<p>Mitigation Measures</p> <p>No mitigation measures would be required under the <i>No Action Alternative</i>.</p>

3.8 TRANSPORTATION					
Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action Alternative
<p>Impacts</p> <p>Under the <i>Proposed Action</i>, the commuter population (faculty, staff, and commuter students) is forecasted to increase by approximately 1,477 commuters. The PM peak hour trip generation analysis results in 1,102 PM peak hour commuter trips, 189 more than the current level by 2028.</p> <p>All signalized intersections are forecasted to operate at LOS-D or better during the PM peak hour. The LOS is also expected to remain at the same level at signalized intersections or improve with the exception of 12th Ave & Union and 12th Ave & Cherry. At these intersection delays would increase by only 1 second and 4 seconds, respectively.</p> <p>The <i>Proposed Action</i> includes up to 1,867 parking stalls on-campus in the far term, which will adequately accommodate the anticipated on-campus parking demand and meets the major institution parking supply requirements.</p>	<p>Impacts</p> <p><i>Alternative 1</i> assumes the same population growth as the <i>Proposed Action</i> and growth in support facilities but no expansion of housing resulting in an increasing number of commuter students.</p> <p>The commuter population (faculty, staff, and commuter students) is forecasted to increase by approximately 2,450 commuters. The PM peak hour trip generation analysis results in 1,121 PM peak hour commuter trips, 208 more than the current level by 2028.</p> <p>Overall the intersection LOS delays increase very minimally under <i>Alternative 1</i>, however the northbound approach at 13th Avenue & Cherry falls from LOS-E to LOS-F with 52 seconds of average delay</p> <p>Parking demand would increase under <i>Alternative 1</i>. Under this <i>No Student Housing Alternative</i> there would be 9,572 commuters that would require a parking supply of 2,052 stalls at peak times. This is 185 stalls over the proposed supply of 1,867 stalls. Additional parking would have to be provided if this alternative were pursued.</p>	<p>Impacts</p> <p>The effect of a <i>No Street Vacation Alternative</i> on the transportation network would include a potential reduction in the size of the proposed Logan Field Garage and the need to make up the parking at another location. Planned vacations for the MUP approved mixed-use project at 12th and Cherry and proposed vacations on the west side of the campus would not adversely affect transportation conditions.</p>	<p>Impacts</p> <p>This alternative would likely reduce development potential and could result in less student housing than contemplated under the <i>Proposed Action</i>. The effect of this on transportation would be similar to the <i>Alternative 1</i> where there would be an increase in trips generated by the University and additional parking supplies would have to be provided.</p>	<p>Impacts</p> <p>This alternative would also likely reduce development potential and could result in less student housing than contemplated under the <i>Proposed Action</i>. The effect of this on transportation would be similar to <i>Alternative 1</i> where there would be an increase in trips generated by the University and additional parking supplies would have to be provided.</p>	<p>Impacts</p> <p>No transportation impacts would be assumed under the <i>No Action Alternative</i>.</p>
<p>Mitigation Measures</p> <p>Analysis of the <i>Proposed Action</i> and its alternatives did not reveal any adverse impacts that would require mitigation under SEPA.</p>	<p>Mitigation Measures</p> <p>Analysis of the <i>Proposed Action</i> and its alternatives did not reveal any adverse impacts that would require mitigation under SEPA.</p>	<p>Mitigation Measures</p> <p>Analysis of the <i>Proposed Action</i> and its alternatives did not reveal any adverse impacts that would require mitigation under SEPA.</p>	<p>Mitigation Measures</p> <p>Analysis of the <i>Proposed Action</i> and its alternatives did not reveal any adverse impacts that would require mitigation under SEPA.</p>	<p>Mitigation Measures</p> <p>Analysis of the <i>Proposed Action</i> and its alternatives did not reveal any adverse impacts that would require mitigation under SEPA.</p>	<p>Mitigation Measures</p> <p>No mitigation measures would be assumed under the <i>No Action Alternative</i>.</p>

3.9 CONSTRUCTION IMPACTS					
Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action Alternative
<p>Impacts</p> <p><u>Air Quality</u> Construction of the <i>Proposed Action</i> would generate air pollutants as a result of fugitive dust from demolition activities associated with the buildings and the surface parking areas, earthwork, and emissions from construction vehicles. Such emissions, however, would be temporary in nature and localized to the immediate vicinity of the construction activity and would not, therefore, be anticipated to be significant.</p> <p><u>Noise</u> Noise from demolition and construction activities for new or expanded facilities have the potential to impact nearby receivers, particularly sensitive uses such as residences, schools, or hospitals. The temporary nature of construction coupled with its restriction to daytime hours minimizes the potential for significant impacts from construction activities and equipment.</p> <p><u>Environmental Health</u> See <i>Environmental Health</i> Section.</p> <p><u>Transportation</u> Construction-related traffic impacts would occur in varying degrees throughout the construction process including construction worker commuter traffic and parking and truck traffic on adjacent roads bringing heavy equipment to the worksite, removing excavated materials and delivering fill materials.</p> <p>As individual projects are planned and Master Use Permits applied for, the need for a construction traffic management plan and/or street use permits would need to be evaluated if a project is likely to impact traffic flow on nearby streets.</p>	<p>Impacts</p> <p>Construction related impacts under <i>Alternative 1</i> would be similar to those assumed under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Construction related impacts under <i>Alternative 2</i> would be similar to those assumed under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Construction related impacts under <i>Alternative 3</i> would be similar to those assumed under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>Construction related impacts under <i>Alternative 4</i> would be similar to those assumed under the <i>Proposed Action</i>.</p>	<p>Impacts</p> <p>No construction-related impacts would be assumed under the <i>No Action Alternative</i>.</p>

3.9 CONSTRUCTION IMPACTS					
Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action Alternative
Mitigation Measures <u>Air Quality</u> Site development would adhere to Puget Sound Clean Air Agency's regulations and the City's construction best practices regarding demolition activity and fugitive dust emissions. <u>Noise</u> Some relatively simple and inexpensive practices can reduce the extent to which people are affected by construction noise and ensure that construction noise levels stay within the applicable daytime sound level limits. Examples include using properly sized and maintained mufflers, engine intake silencers, engine enclosures, and turning off idle equipment. Construction contracts can specify that mufflers be in good working order and that engine enclosures be used on equipment when the engine is the dominant source of noise. Stationary equipment could be placed as far away from sensitive receiving locations as possible. Substituting hydraulic or electric models for impact tools such as jack hammers, rock drills and pavement breakers could reduce construction and demolition noise. Construction staging areas expected to be in use for more than a few weeks should be placed as far as possible from sensitive receivers, particularly residences. In areas where construction would occur within about 200 feet of existing uses (such as residences, schools/classrooms, and noise-sensitive businesses), effective noise control measures should be employed to minimize the potential for noise impacts. Such measures could include using quiet equipment and temporary noise barriers to shield sensitive uses, and orienting the work	Mitigation Measures Mitigation measures assumed under <i>Alternative 1</i> would be similar to those assumed under the <i>Proposed Action</i> .	Mitigation Measures Mitigation measures assumed under <i>Alternative 2</i> would be similar to those assumed under the <i>Proposed Action</i> .	Mitigation Measures Mitigation measures assumed under <i>Alternative 1</i> would be similar to those assumed under the <i>Proposed Action</i> .	Mitigation Measures Mitigation measures assumed under <i>Alternative 3</i> would be similar to those assumed under the <i>Proposed Action</i> .	Mitigation Measures No mitigation measures are assumed under the <i>No Action Alternative</i> .

3.9 CONSTRUCTION IMPACTS					
Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action Alternative
areas to minimize noise transmission to sensitive off-site locations. <u>Environmental Health</u> See the <i>Environmental Health</i> section. <u>Transportation</u> The proponent would coordinate with SDOT to minimize impacts caused by construction vehicle traffic. A construction traffic plan for truck deliveries/routes and construction workers would be prepared to minimize disruption to traffic flow on adjacent streets and roadways. The proponent would coordinate with Metro transit relative to construction activity that could affect transit service proximate to the project site.					

3.10 HOUSING					
Proposed Action	Alternative 1 No Student Housing Alternative	Alternative 2 No Alley Vacation Alternative	Alternative 3 No MIO Boundary Expansion	Alternative 4 No Height Increase East of 12th Ave	No Action
<p><u>Impacts</u></p> <p>Up to 1,239,000⁸ square feet of the 2,145,000 sq. ft. of development assumed under the Proposed Action could be dedicated to student housing. to accommodate approximately 1,923 to 2,806 new student beds accommodating a total of up to approximately 4,584 students (or 48 percent) would be accommodated in existing or new student housing (3,091 undergraduate or 60 percent and 1,457 graduate or 36 percent). This amount of proposed student housing almost exactly matches the University's goal of accommodating up to 60% of undergraduate and 36% of graduate students in on-campus housing. This represents approximately 48% of all students as projected in 2027.</p> <p>No development is planned by the University in the proposed MIO boundary expansion areas and would not be assumed to displace existing on-campus private residential uses or student housing within the existing MIO boundary area or within any of the proposed MIO boundary expansion areas.</p> <p>The addition of the proposed housing facilities could be expected to relieve pressure on the tight private rental market in the surrounding neighborhoods by reducing the need for students to seek off-campus housing.</p>	<p><u>Impacts</u></p> <p>As part of the Proposed Action, a total of 2,145,000 sq. ft. of development is assumed with up to approximately 1,109,000 sq. ft. developed as new student housing and 1,036,000 sq. ft. developed as other uses. This alternative assumes comparable increases in student enrollment, staff and faculty to that of the Proposed Action; however, no new student housing is included as part of this alternative. This alternative assumes the total amount of development would be decreased by 560,000 sq. ft. (approximately 300,000 sq.ft. in the Near-Term and approximately 260,000 sq.ft. in the Long-Term). The remaining 1,585,000 sq. ft. of development assumed under the Proposed Action would occur but would be developed as academic, student life, religious and support facilities uses.</p>	<p><u>Impacts</u></p> <p>Under No Street or Alley Vacations Alternative, new student housing would still be built under the proposed Near-Term development. Assumptions regarding housing impacts associated with this alternative would, therefore, be similar to the Proposed Action (i.e., no on-campus private residential uses or student housing would be displaced and pressure on the private rental market would be reduced).</p>	<p><u>Impacts</u></p> <p>None of the proposed housing projects are within the University's proposed MIO boundary expansion area and all the proposed housing projects could continue to be built under the No MIO Boundary Expansion Alternative. Therefore, assumptions regarding housing impacts associated with this alternative would be similar to the Proposed Action (i.e., no on-campus private residential uses or student housing would be displaced and pressure on the private rental market would be reduced).</p>	<p><u>Impacts</u></p> <p>The No Height Increase E. of 12th Avenue Alternative would affect two proposed housing projects including #301 – Student Housing/Office/Mixed-Use at 13th Avenue and #312 – 1313 E Columbia Street. Project #301 would be limited to a height of 50 feet, which would result in one less floor of development. This would equate to a loss of approximately 31,000 sq.ft. of development and a reduction of approximately 45 beds of student housing.</p> <p>Project #312 could consist of one of three possible land use options: student housing, academic space or a university center. In the event that the student housing land use option is selected, this alternative would limit development to the current 37 ft. (approximately 3-story) height. Such would equate to a loss of approximately 210,000 sq.ft. of development and a reduction of approximately 225 beds.</p>	<p><u>Impacts</u></p> <p>The No Action Alternative would entail no new plans for construction or renovation of student housing facilities, however, building and renovation projects identified in the existing MIMP could be expected to continue. The only housing project identified in the existing MIMP is #105 - 1223 E. Cherry Street Redevelopment, which would provide approximately 159 student beds. The student population would still be expected to increase by 36 percent. Without the additional 159 student beds included for the remaining 6 proposed housing projects, the private rental market could experience increased pressure as a result of more students seeking off-campus housing alternatives.</p>
<p><u>Mitigation Measures</u></p> <p>No housing impacts are anticipated under the Proposed Action and no mitigation measures are proposed.</p>	<p><u>Mitigation Measures</u></p> <p>No housing impacts are anticipated under the Proposed Action and no mitigation measures are proposed.</p>	<p><u>Mitigation Measures</u></p> <p>No housing impacts are anticipated under the Proposed Action and no mitigation measures are proposed.</p>	<p><u>Mitigation Measures</u></p> <p>No housing impacts are anticipated under the Proposed Action and no mitigation measures are proposed.</p>	<p><u>Mitigation Measures</u></p> <p>No housing impacts are anticipated under the Proposed Action and no mitigation measures are proposed.</p>	<p><u>Mitigation Measures</u></p> <p>No housing impacts are anticipated under the Proposed Action and no mitigation measures are proposed.</p>

⁸ Although up to 1,239,000 sq. ft. of student housing could be provided under the Proposed Action, only approximately 1,109,000 sq. ft. would be new development. Approximately, 130,000 sq. ft. of existing sq. ft. would be renovated and converted to new student housing.

Section I

List of Recommendations

The following are the recommendations of the Seattle University Major Institutions Program Citizen's Advisory Committee (CAC).

Recommendation 1 - That the Final Major Institutions Master Plan for Seattle University should be adopted by the City of Seattle.

Recommendation 2 - Seattle University shall create and maintain a Standing Advisory Committee to review and comment on all proposed and potential projects prior to submission of their respective Master Use Permit applications. Any proposal for a new structure greater than 4000 square feet or additions greater than 4000 square feet to an existing structure shall be subject to formal review and comment by the Standing Advisory Committee. The Standing Advisory Committee (SAC) will use the Design Guidelines for evaluation of all planned and potential projects outlined in the Master Plan.

Recommendation 3 - That five years after adoption of the Master Plan and every 5 years thereafter, Seattle University in cooperation with its SAC shall hold a public meeting to review its annual report and other information intended to illustrate the status of plan implementation. The meeting shall be widely advertised to the surrounding community and involve opportunity for public comment.

Advertisement of this meeting shall generally conform to the procedure of the Department of Neighborhoods shall include at a minimum: -

- a. Mailing to all property owners and residents within 600 feet of the MIOP boundary;
- b. Publication in the City Land Use Bulletin;
- c. E-mail notification to all those who have attended any meeting concerning this issue within the last five years
- d. E-mail notification to the presidents or designated representatives of all community Councils, Chambers of Commerce or other known neighborhood based organizations on the Department of Neighborhoods Community Contacts lists for the Central Area and First Hill Communities;
- e. Posting on the Department of Neighborhoods and Seattle University's web-sites.

Recommendation 4 - The total amount and general distribution of proposed development on the Seattle University Campus should be approved as outlined in the proposed MIMP. All Associated FAR and lot coverage's proposed in the plan are similarly acceptable to the CAC.

Recommendation 5 - That the boundary expansion as requested by Seattle University along Broadway be approved without additional conditions.

Recommendation 6- That the boundary expansion as requested by Seattle University at the northeast corner of 12th and E Marion, be approved on condition that the MIMP incorporate those restrictions in the Director's final report (Condition #44 and 45), that for the site located at the northeast corner of 12th Avenue and East Marion Street (currently the Photographic Center Northwest), any potential university development on the parcel fronting on the pedestrian-designated 12th Avenue will comply with allowed uses per SMC 23.47A.005.D1 or those additional uses as follows

- "
 - campus bookstore
 - child care facility
 - coffee shop
 - food service
 - fitness center
 - copy center
 - theater / performing arts
 - financial / banking centers
 - community meeting spaces
 - campus /community service centers**
 - "art center" or "active nonprofit use"***

***Service Center uses include but are not limited to activities such as community outreach; employment and employee services; public safety services including transit and parking-pass distribution, lost and found, keys, and dispatch; student services; and counseling services."

** Active nonprofit use means one that would encourage public participation in events or programs such as the Central Area Forum for Arts and Ideas.

"Art center", is a facility that is more than a single purpose gallery use

Recommendation 7 - The proposed vacation of that portion of E. Columbia Street between Broadway and mid-block between Broadway and the vacated 10th Avenue Right-of-way and the connecting alley south to E Cherry Street should be approved subject to the condition that neither application nor approval should be granted until such time as Seattle University has acquired ownership of all (or approval of all) properties accessed by this alley.

Recommendation 8 - That in the event that development above the threshold of a ground level footprint of 75,000 square feet on 1313 E Columbia Street or 45,000 square feet on 1300 E. Columbia Street occurs, that Seattle University shall submit a plan for review by the CAC that shows Seattle University's actual open space plan for these two sites. Provision of open space on both of these spaces shall be a requirement of development and receive DPD approval of the plan.

Recommendation 9 - Open space shall be required for both the 1300 and 1313 E. Columbia Street sites and provision of accessible open space at one site shall not relieve Seattle University from its obligation to provide open space at the other site.

Recommendation 10 – 13th Avenue between E. Columbia and E. Cherry streets be redesigned with widened sidewalks and other features intended to foster a pedestrian character.

Recommendation 11 - In the event that Seattle University determines that vacating all, or a portion of 13th Avenue between E Columbia and E. Cherry Streets for the provision of greater open space is warranted and desirable, that such a vacation be allowed without requiring a modification of the Seattle University Master Plan, and that that street designation as the location of planned open space in the published plan be considered sufficient plan reference to allow such a proposal to proceed through a separate street vacation process.

Recommendation 12 – Maintenance of the 105 foot height limit for the majority of the Seattle University Campus west of 12th Avenue and the increases for heights along Broadway should be approved without conditions.

Recommendation 13 – The Heights as proposed east of 12th Avenue in the Final Major Institutions Master Plan dated June 2011 should be approved with the exception of the 1300 and 1313 East Columbia sites, for which the University and the CAC agreed to specific significant reductions in height and additional ground and upper level setbacks.

Recommendation 14 – Height limits and setbacks for 1300 and 1313 E. Columbia shall be as shown in updates to the Plan provided by both Seattle University and DPD and generally shall be:

For 1313 E. Columbia:

1) A ground level setback of 15 feet along 14th Avenue; 2) an upper level setback to a point 80 feet to the west of 14th Avenue within which no portion of the structure except those exempted from height limitations by Code may exceed an elevation of 328.01 feet; and 3) for the remainder of the site, no portion of the structure except those exempted from height limitations by Code may exceed an elevation of 345.14 feet.

For 1300 E. Columbia:

1) A setback of 15 feet along 14th Avenue and the north margin of the site; 2) a setback of 10 feet along 13th Avenue; and 3) a lower height limit of 337.35 feet in elevation and an upper height limit of 346.3 feet in elevation as established by DPD in the Report of the Director of DPD.

Recommendation 15 - Any development that proposes to exceed the agreed-upon building envelope established for the 1313 East Columbia site or 1300 East Columbia site shall require a major amendment to the Master Plan

Recommendation 16- Prior to any decision by Seattle University to move forward with a MUP application for an Event Center, the following shall be required:

- 1) completion of site feasibility study including analysis of all alternative locations;
- 2) completion of a traffic analysis and site specific light, glare, and noise studies ;
- 3) completion of a preliminary design study including the potential building envelope as defined in the MIMP and illustrations of an actual conceptual design of the exterior of the building.
- 3) facilitation and hosting of at least one meeting with the wider community during which the preliminary outcomes of 1 through 3 above are presented and public comment taken. The meeting shall be widely advertised.

The Standing Advisory Committee shall be involved in the review of the scopes of work for each study, and shall review the studies at key points in their development. The completed studies, documentation of community comments received at the public meeting, and any Standing Advisory Committee comments or recommendations shall accompany any MUP application.

Recommendation 17 - In the event that a decision is made to move to the MUP phase, and as part of any MUP or SEPA review, the Standing Advisory Committee shall be given the opportunity to review and comment on the project during the schematic and design development phases.

Recommendation 18- That for the boundary expansion areas on 13th Avenue along E. Marion street, that existing housing be maintained until such a time as the University identifies a specific use for the sites, and that priority for development on both sites be for residential use.

Recommendation 19 – That, within the expansion areas, if any market rate or affordable housing units use are demolished or changed to major institution uses, the University must provide comparable replacement housing; and that construction of student housing (dormitories or other SU owned student housing) should not constitute replacement housing.

Recommendation 20 – The Urban Design Strategies for 12th Avenue shown on pages 142 and 143 and the map identifying is acceptable and should be used as the template for future development along this street and considered during the review of any applications for permits to improve any Seattle University development along 12th Avenue. Seattle University should be encouraged to create street activating uses and retail wherever possible, including areas not now identified for such on page 141 of the plan, along 12th Avenue and particularly on blocks where existing buildings do not now include such uses.

Recommendation 21 – That Seattle University shall involve the Standing Advisory Committee in the review of streetscape plans for both Madison Street and Broadway adjacent to its Campus.

Appendices

Appendix 1 Minority Report

The following Minority report was provided by Bill Zosel and Ellen Sollod.

Recommendation 1 – That the Final Major Institution Master Plan for Seattle University not be adopted by the City of Seattle at least until after the completion of an adequate Environmental Impact Statement which provides the Director of the Department of Planning and Development and the City Council the evidence and analysis necessary to make an informed decision.

The purposes of an Environmental Impact Statement include providing an "impartial discussion of significant environmental impacts and ... (informing) decision makers and the public of *reasonable alternatives*, including mitigations measures, that would avoid or minimize adverse impacts or enhance environmental quality," (emphasis added) SMC 25.04.400.

SMC 25.05.030 B. states that "Agencies shall to the fullest extent possible: ...

3. Prepare environmental documents that are concise, clear, and to the point *and are supported by evidence* that the necessary environmental analyses have been made." ...

7. Identify, evaluate, and require or implement, where required by the act and these rules, *reasonable alternatives that would mitigate adverse effects of proposed actions on the environment.*" (emphasis added).

The EIS in this matter fails to provide evidence and analysis of the alternatives that are at the very core of the Seattle Land Use Code's regulatory scheme for major institution development. SMC 34.69.002 sets forth the purpose and intent of the code regarding a Major Institution Master Plan (MIMP). The Code supports "appropriate institutional growth within boundaries" and seeks to "balance a Major Institution's ability to change ... with the need to protect the livability and vitality of adjacent neighborhoods."

The Code explicitly states a purpose and intent to:

"Encourage the concentration of Major Institution development on existing campuses, or alternatively, the decentralization of such uses to locations more than two thousand five hundred (2,500) feet from campus boundaries," SMC 23.69.002 C.

and, for emphasis:

"Discourage the expansion of established major institution boundaries," SMC 23.69.002 E.

The proposed MIMP of Seattle University fails to propose any development on numerous sites within its existing campus and, instead, proposes to expand its boundaries. All of the needs for space for uses identified by Seattle U. in its proposed MIMP could be accommodated within its existing campus. Whether or not the proposed MIMP, with boundary expansions and development standard changes is consistent with the Seattle Land Use Code it is impossible to tell because the EIS does not provide the evidence and analyses necessary to make an informed decision.

Recommendation 2 – If the Final MIMP of Seattle University is adopted, the expansion of the campus boundaries to the area between 12th and 13th Avenues on either side of E. Marion Street should not be approved.

While the Land Use Code explicitly discourages boundary expansion, of course some expansion of boundaries of major institutions must be permitted by the Code. However, at the very least there should be a demonstration of a need for such expansion. Far from a demonstration of need, the proposed S.U. MIMP does not even suggest a possible need or use for expansion into this area. The expansion should not be approved without an

Environmental Impact Statement which analyzes the uses for such an expansion and considers the alternative locations on the existing campus.

The area of proposed boundary expansion includes a site on 12th Avenue of approximately 10,440 square feet in a Neighborhood Commercial Zone. It has been occupied for several decades by the Photographic Center Northwest, a school and art gallery. If the Photographic Center chose to move some time in the future the site could continue to be the location of neighborhood serving commercial space, and, possibly, new housing.

Immediately to the east of the Photographic Center building, at the northwest corner of 13th Avenue and E. Marion Street the S.U. MIMP expansion would include an undeveloped site of approximately 8,689 square feet zoned MR 3. (This is currently a parking lot). Depending on the type of development, this site could accommodate twenty or more units of housing, contributing significantly to the vitality of the neighborhood and furthering the goals of the City of Seattle Comprehensive Plan, the Central Area Neighborhood Plan, and the 12th Avenue Plan.

On the South side of E. Marion Street and on 13th Avenue the MIMP expansion proposes to include seven lots zoned MR3 all of which have housing, although not necessarily developed to the zoned potential. The proposed expansion to include these lots could remove dozens of actual and potential housing units from the housing stock of the 12th Avenue Urban Village. City policy clearly intends that the University build housing on its campus and not displace existing housing and housing development potential --- either through the substitution of University uses, or by the distortion of the market resulting from University land-banking.

The EIS does not discuss evidence or analyze evidence for expansion into this area. The expansion should not be approved until such an EIS analysis occurs and the Director of DPD has an opportunity to review the analysis.

The threat to a vital 12th Avenue cultural institution and business, and the elimination of dozens of actual and potential housing units from the neighborhood is contrary to Seattle's Comprehensive Plan, the Central District Plan, and the Mayor's 12th Avenue Plan, all of which are intended to support and encourage commercial and housing density.

In particular, pursuant to the Mayor's 12th Avenue Plan the City of Seattle purchased land on 12th Avenue through an exchange of money and other real estate. This is land that Seattle University had owned. The Mayor's 12th Avenue Plan created the transfer of this land from Seattle University to the City so that a more vital mixed-use "main street" could be supported. Pursuant to the Plan the City selected developers to whom it sold its newly acquired 12th Avenue sites. Rather than demanding "top market value" from purchases of these sites, the City placed additional demands on purchasers. That is, purchasers were required to build mixed-use buildings with neighborhood-serving retail space. In return, the City accepted payment that probably was less than it could have received from sales unhindered by the City's particular objectives.

Furthermore, in a quite unusual policy move, the City dedicated the proceeds from the sale of its land to capital improvements on and near 12th Avenue --- mainly curb bulbs, textured crosswalks, pedestrian-scale streetlights, and street trees. This was done to encourage and foster residential and retail development that would result in a 12th Avenue that serves the neighborhood in addition to the institution of Seattle University. To allow the University to expand to the east side of 12th Avenue after two decades and millions of dollars invested by the City to foster non-institutional development is contrary to the 12th Avenue Plan adopted by the City Council.

Balanced against the policy and goals of the 12th Avenue Plan there is no need on the part of the institution cited in the EIS or the proposed MIMP.

Recommendation 3-- If the final MIMP of Seattle University is adopted, the height increase for the 12th Avenue site of the Photographic Center Northwest should not be granted.

S.U. in its proposed MIMP asks for an increase in the allowed height for development on a portion of a 12th Avenue block from 40 feet to 65 feet.

This request is controlled by SMC 23.34.009, which sets forth standards for rezones in a commercial or industrial area. The criteria of the Land Use Code make it clear that gradual transitions are required and raising the height for a portion of a block without buffers between that portion and adjacent properties should not be allowed.

(While it is not denied that an argument could be made that a 65 foot height limit for all 12th Avenue commercial properties could be appropriate, that is an argument that should apply to the entire block or to several blocks and it is not appropriate to increase the height limit for one building for one potential developer.) If S.U. develops to a greater height than is allowed adjacent development it could have an undue impact on the nearby buildings and uses. Furthermore, until S.U. goes forward with development on that site, the fact that it, and it alone, has the right to a greater height will have the effect of discouraging other possible development on the site.

Recommendation 4 - If the final MIMP of Seattle University is adopted, the development standard changes for the block bounded by 14th and 13th Avenues, and E. Cherry and E. Columbia Streets, (the landmark Coca Cola site) should not be adopted.

The proposed MIMP would allow remodeling or adding to the historic Coca Cola bottling building and/ or increases in height limits for the block. This is a landmark building and the site is adjacent to small-scale residences. Development on this site, therefore, is particularly sensitive. Seattle University contemplates the possibility of an event center or basketball arena at this site. As pointed out in comments to the EIS and in submissions by neighbors, the University has not explored in a meaningful way alternatives which would make the proposed changes unnecessary. Even if an events center were placed on this site, the exact location of the footprint of the building possibly could be moved a some feet to the west, and/or excavation could result in some of the event center being built below the current grade. Other locations within the S.U. campus that could accommodate an events center have not been explored. The Environmental Protection regulations of the City of Seattle require reasonable alternatives to be analyzed.

Furthermore, the height increases proposed by the S.U. MIMP are contrary to the rezone criteria of the Land Use Code. The gradual transition standards are not met.

Recommendation 5 – If the final MIMP of Seattle University is adopted, the development standard changes for the block bounded by 14th and 13th Avenues, and E. Columbia and E. Marion Streets, (the hospital laundry site) should not be adopted.

The proposed MIMP would change the development standards for *part of* the block that is occupied by the hospital laundry building. This site is not currently controlled by Seattle University. The University states that it could remodel or replace the existing building and/or build on the existing unbuilt portion of the site for housing or academic uses.

The Land Use Code strongly encourages the development of Major Institutions to take place on existing campuses and strongly discourages expansion. The EIS and the proposed MIMP provide no evidence and no analysis as to why adequate new housing and adequate new academic space cannot be developed on sites on the existing campus and with existing development standards.

Hundreds of thousands of square feet of space is available within S.U.'s current campus and zoning envelope. No existing building would need to be removed and replaced other than those that S.U. already has said it intends to replace. No existing campus open space need be removed.

The Major Institution Master Plan Land Use Code allows institutions greater heights than is allowed to other owners or developers. The purpose of such greater height allowances is that taller institutional development may take place making it less necessary for the institution to spread its impacts farther into nearby commercial and residential neighborhoods. While S.U. has in past Master Plans requested and received significant increases in zoning heights on its campus, it is now failing to use the already-granted greater height limits and, instead, is seeking develop taller buildings in new areas in residential blocks.

Without, at least, an analysis of the possibilities present in the existing zoning envelope, new height increases should not be granted. The EIS fails to consider these reasonable alternatives. The Director of DPD did not have the benefit of any such analysis before making her recommendation.

Furthermore, the proposed height increases for a portion of this block are contrary to the rezone criteria of the Land Use Code. The gradual transition standards are not met. In fact, there is no transition. Rather, the proposed height increases have a boundary that is in mid-block and severely impact adjacent residential sites.

These sites are currently of a much smaller scale, but even if the owners chose to replace them in the future, they would not be allowed to develop to the height that is allowed its immediate neighbor, Seattle University. It is likely that the livability and the value of the properties on the same block as S.U. would be seriously impacted. This is not analyzed by the EIS.

Recommendation 6 – If the final MIMP of Seattle University is adopted, the proposed Transportation Management Plan should be improved so that there are more effective efforts to reduce the impacts of single occupancy vehicle commuting on the neighborhood.

Recommendation 7 – If the final MIMP of Seattle University is adopted, the mechanisms for providing advance notice and opportunity for review of future development should be improved.

The Major Institution Master Plan Land Use Code regulations do not require the institution to reveal in its Master Plan specific uses for specific sites. Yet, a major purpose of the Land Use Code is to provide adequate notice of planned developments. The proposed MIMP of Seattle University contains requests for significant development standard increases and requests for boundary expansions without, in some cases, any indication of possible future development on those sites. The final MIMP should contain provisions that require the University to reveal at the earliest possible time its planning for potential development on particular sites so that the public can be informed and participate in a manner consistent with the spirit of the Major Institution Land Use Code.



City of Seattle

Department of Planning and Development
Diane Sugimura, Director

**CITY OF SEATTLE
ANALYSIS, RECOMMENDATION AND DETERMINATION OF
THE DIRECTOR OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

Application Number: 3008328
Applicant Name: Seattle University
Address of Proposal: 901 12th Avenue

SUMMARY OF PROPOSED ACTION

City Council Action: Approval of a new Major Institution Master Plan for Seattle University.

The following approvals are required:

Council Action – Major Institution Master Plan – SMC Chapter 23.69

Council Action – Rezone and Designation of a Major Institution Overlay – SMC
Chapter 23.34 (from MIO 37, 50, 65, 85, 105 160 to MIO 37, 65, 90, 105, 160)

SEPA – Environmental Determination – SMC Chapter 25.05.

SEPA DETERMINATIONS: ☐ Exempt ☐ DNS ☐ MDNS ☒ EIS

☐ DNS with conditions

☐ DNS involving non-exempt grading, or demolition, or
involving another agency with jurisdiction.

INTRODUCTION

This report is the Director's analysis and recommendation to the City Council on the Seattle University Final Major Institution Master Plan (herein referred to as either Master Plan or MIMP). The report considers the recommendations of the Citizens Advisory Committee (CAC), the environmental analysis and comments in the Final Environmental Impact Statement (FEIS), and the applicable portions of the adopted policies and regulations of the Seattle Municipal Code (SMC) Title 23, Land Use Policies and Codes. The Department of Planning and Development (DPD) is the SEPA lead agency.

The Director recommends approval of the Final Master Plan subject to the conditions outlined in Section VII, at the conclusion of this report.

This report is divided into seven sections.

- ◆ **Section I** (page 2) includes background information on the project, including application history, a description of the project site, the CAC and public comment.
- ◆ **Section II** (page 7) identifies the general purpose, mission and goals of the Seattle University Final Master Plan.
- ◆ **Section III** (page 8) discusses the Final Master Plan's program elements.
- ◆ **Section IV** (page 15) analyzes the Final Master Plan's compliance with major institution policies and codes, including a comprehensive analysis of impacts and recommended mitigation pursuant to SMC 23.69.002 and SMC 23.69.032 E.
- ◆ **Section V** (page 45) analyzes the Final Master Plan's compliance with applicable rezone criteria.
- ◆ **Section VI** (page 62) summarizes the SEPA analysis contained in the FEIS, and refers to applicable mitigations.
- ◆ **Section VII** (page 74) lists the conditions recommended by the Director.

I. BACKGROUND INFORMATION

Seattle University (SU) was founded at this site in 1891. Existing buildings at the campus total approximately 2,044,000 square feet.

Seattle University has applied to the Department of Planning and Development (DPD) for a new Major Institution Master Plan. If approved, this Master Plan will replace the existing Master Plan.

Seattle University has requested to enlarge its existing Major Institution Overlay (MIO) boundary to include three new areas as shown on Figure 1:

1. **Area A** comprises approximately 1.14 acres. It extends from 12th Avenue on the west to 13th Avenue on the east and from just north of East Marion Street on the north to north of East Columbia Street on the south. There are eleven structures within this expansion area totaling approximately 38,110 square feet; they include one commercial building and approximately 19 dwelling units in the remaining ten structures. This site includes the existing Photographic Center Northwest organization in one of the commercial structures. The proposed overlay height of Area A is MIO 37 and MIO 65.

2. **Area B** comprises approximately 0.44 acres and is bounded by Broadway on the west and East Cherry Street (extended) on the south. There are two commercial structures within this expansion area (approximately 39,000 square feet and 44,000 square feet). The proposed overlay height for Area B is MIO 160.
3. **Area C** comprises approximately 0.83 acres and is bounded by Broadway on the west, East James Street on the north and East Jefferson Street on the south. There are three buildings within this expansion area totaling approximately 49,700 square feet. One of the structures contains a restaurant at street level with four residential dwelling units above and the other structures contain 30 to 40 dwelling units. The proposed overlay height for Area C is MIO 90.

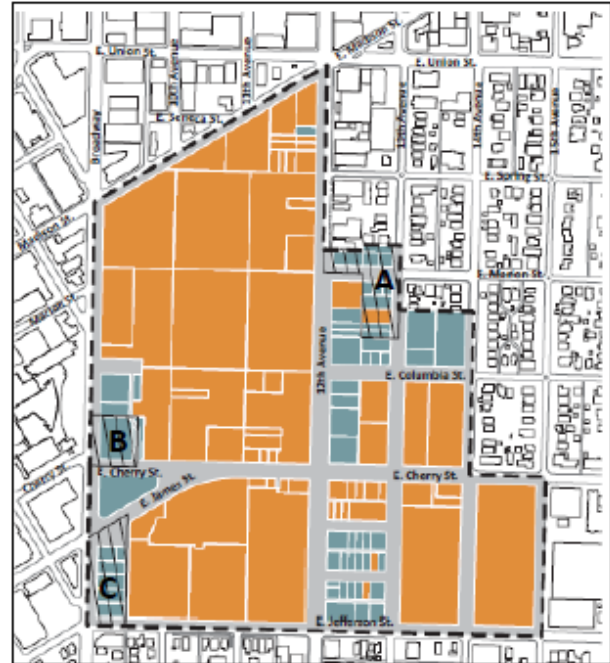


Figure 1. Proposed Expanded MIO Boundaries

Total new planned (definite plans to construct in the next ten years and possibly by 2013) and potential (less defined but could be constructed in the next ten years and possibly by 2016) near-term construction would result in a net increase of approximately 1,220,000 million square feet. Total new long term potential (as needs arise and funding becomes available, development would occur in the 2017-2027 year timeframe) construction would result in a net increase of approximately 925,000 square feet. The total net increase of near and long term projects would be 2,145,000 square feet. The total square footage on the campus following construction of both planned and potential projects near and long term development would be approximately 4,189,000 square feet (including existing development).

The planned and potential projects include academic facilities, housing and student life facilities, and various campus enhancements, such as open spaces, pedestrian pathways and arrival features. Several of the near-term planned developments have already been completed under the existing MIMP (see Table 2-2, page 2-21 of the FEIS and Figure 4 of this document). The long-term projects include the addition of housing and integrated learning spaces, replacement of surface parking with structured parking, as well as campus enhancements.

The Master Plan would continue to provide parking in existing established parking lots and new parking facilities on the campus that are accessory to both planned and potential buildings. In addition to the existing 1,529 parking spaces located in garages and surface parking lots, the Plan proposes to increase parking by 339 new spaces on campus for a total of 1,868 spaces.

A. STREET AND ALLEY VACATIONS

In addition to the construction of the projects outlined above, the applicant is proposing the partial vacation of one street, partial vacation of three alleys and one full alley vacation. While the street vacation process necessarily follows any MIMP review and approval, and is subject to its own procedures and policies, DPD anticipates these decisions will include common elements (such as site considerations, impacts, and public benefit), and that the analyses will likely include considerable overlap with the issues analyzed in this report.

I. B. MAJOR INSTITUTION OVERLAY/REZONE

Seattle University proposes to expand the Major Institution Overlay (MIO) to include the three areas outlined on pages 2 and 3 of this report. Seattle University also proposes several changes to the building height allowances within the existing and proposed boundaries. As proposed, the height limits on the property at the northwestern quadrant of Columbia and 14th would be increased from 37 feet to 55 feet. The southwestern quadrant would be increased from 37 feet to 65 feet. The height limit on the area of campus generally east of 12th would increase from 50 feet and 37 feet to 55 and 65 feet.



Figure 2. Existing MIO Boundaries and Height Limits

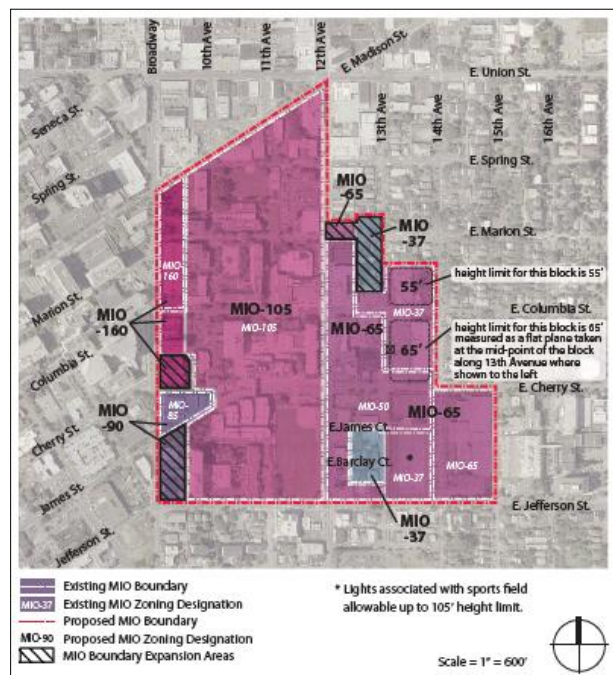


Figure 3. Proposed MIO Boundaries and Height Limits

Figure 2 shows the existing MIO boundaries and height limits. Figure 3 shows the existing MIO boundaries and height limits, as well as the proposed boundaries and height limits.

The following approvals are required as part of the Master Plan:

- ❖ Adoption of a new Major Institution Master Plan (SMC Chapter 23.69)
- ❖ Rezone (SMC 23.34, including designation of a Major Institutional Overlay)
 SEPA Review and Analysis (SMC 25.05)

I. C. PROCEDURAL MILESTONES

- Seattle University (SU) began to work with the Department of Neighborhoods (DON) in September 2007 to assist with the formation of a Citizens Advisory Committee (CAC).
- The formation and first meeting of the CAC occurred January 30, 2008.
- SU submitted the formal Notice of Intent to prepare a new Master Plan to the Department of Planning and Development (DPD) on February 27, 2008.
- A Concept Plan was submitted by SU to the DPD dated February 2008.
- DPD issued a Public Notice of Scoping on March 6, 2008, and held a Public Scoping Meeting on March 26, 2008.
- SU submitted an application to the DPD for a new Master Plan on March 27, 2008. The public comment period ended on April 9, 2008.
- A Preliminary Draft Master Plan was submitted by SU to the DPD dated June 2008.
- A Draft Master Plan was submitted by SU to the DPD dated November 2008.
- DPD published a Notice of Availability of the Draft EIS and Public Hearing on May 7, 2009.
- DPD published a Notice of Availability of the Draft MIMP and Public Hearing on May 15, 2009.
- A Public Hearing was held on June 3, 2009 to hear comments on the Draft EIS and Draft MIMP. The written comment period ended on June 21, 2009.
- A Preliminary Final Master Plan was submitted by SU to the DPD dated April 2010.
- DPD published a Notice of Availability of the Final EIS and Final Master Plan on June 2, 2011.

I. D. PRIOR APPROVALS

City Council adopted Seattle University Major Institution Master Plan by Ordinance #118667 in 1997, and that plan remains in effect today. DPD (then the Department of Construction and Land Use – DCLU) prepared the Draft and Final EIS for public review and comment between 1995 and 1996.

The existing MIO contains six height districts: 37, 50, 65, 85, 105 and 160, some of which include height limitations lower than the underlying zoned height. The existing setbacks vary from zero to 15 feet depending on the frontage (see page 61 of existing MIMP). Many of the setbacks are heavily landscaped to provide a vegetated screen between the campus and surrounding neighborhood.

I. E. SITE & VICINITY DESCRIPTION

Seattle University is located on an approximately 47.9-acre site in central Seattle at 901 12th Avenue, located at the confluence of the Capitol Hill/First Hill/Central Area and Squire Park neighborhoods of Seattle. The campus is located just east of downtown Seattle, between First Hill and the Squire Park neighborhood. It is situated between East Madison to the north, East Jefferson Streets to the south and Broadway to the west. The campus is bound on the east by 12th, 14th, and 15th Avenues. The site generally slopes downward from west to east.

Seattle University does not allow vehicular traffic through the central campus. Some university uses are located beyond the central campus and across Cherry Street, 12th, 13th and 14th Avenues to the east. There are a variety of surface parking lots and structured parking garages located throughout the existing campus. There are multiple pedestrian entrance points to the campus including two along Broadway (west side), two along East Cherry Street and one off of East Jefferson Street (southern area), five along 12th Avenue (eastern area) and two along Madison Street (north side).

The surrounding neighborhood is a mixed medium to high-density area with single and multifamily houses, large apartment buildings, commercial uses, civic institutions, hospitals and schools. Many single-family homes exist in the Squire Park neighborhood to the east and south of campus, though many of these have been converted into duplexes, townhouses, and flats.

I. F. PUBLIC COMMENT AND AGENCY COMMENT

DPD solicited public input during the scoping of environmental analysis in February and March 2008, and held a public scoping meeting on March 26, 2008. DPD received written comments during the public review of the Draft EIS from May 7 through June 21, 2009 (45 days) and court reporters transcribed comments from the public hearing on June 3, 2009. Members of the public and affected agencies submitted a total of approximately 27 written comments, and eight individuals provided oral comments at the hearing. These letters and comments are contained in VI and VII of the FEIS. All CAC meetings were open to the public, appeared to be well publicized by Department of Neighborhoods (DON) staff, and were generally well attended by neighbors and interested citizens. Each CAC meeting provided opportunity for public comment. Approximately 14 additional public comment letters were received following the publication of the FEIS. These letters are contained in the project file. Section V of the FEIS summarizes the key issues raised by public comment.

I. G. CITIZENS ADVISORY COMMITTEE

The CAC met regularly throughout the planning process. From early 2008 through late 2011, the CAC held approximately 33 meetings. CAC input was considered during the development of the Draft and Final Master Plan and EIS, as Seattle University modified its initial concept plan in response to CAC comments and concerns. Subsequently, in response to the CAC's formal comments on the Draft Master Plan and Draft EIS, Seattle University made changes to the Final Master Plan, and DPD updated its Final EIS (see Section VI of the Final EIS for the CAC's comment letter). The Final Master Plan summarizes these changes (page 19). The CAC delivered a letter outlining their comments and recommendations on the Draft MIMP and DEIS to DPD on January 9, 2009 (note that a typo was contained in the date of the letter, showing 2008).

I. H. CHANGES TO MASTER PLAN IN RESPONSE TO PUBLIC COMMENTS

Before drafting a Master Plan, Seattle University solicited comments from members of the public on its Internal Concept Plan. In response to the comments it received, Seattle University agreed in its Draft Master Plan to (a) limit its proposed full-block boundary expansion along 12th between Spring and Marion to include only the Photographic Center site; (b) not to seek vacation of the alley vacation adjacent to the Northwest Kidney Center as long as the Kidney Center operates; and (c) conduct a detailed study of the 12th Avenue corridor, which appears on pages 142-145 of the Final Master Plan.

Section VI of the FEIS includes written comments on the DEIS and responses to those comments. Section VII of the FEIS includes public testimony regarding the FEIS and responses to those comments. Seattle University selected the Proposed Action as its Final Master Plan. In selecting the Proposed Action, Seattle University made the following changes to the Final Master Plan in response to comments from the public, the CAC and DPD.

- ◆ Clarification of the institution's plans for future growth;
- ◆ Increased sensitivity to the existing residential neighborhood with more nuanced provisions including:
 - ❖ Increased upper level setbacks at the most sensitive MIO boundary edges;
 - ❖ Decreased height at the Barclay Court Area;
 - ❖ Additional planned and potential open space;
- ◆ Development of a streetscape plan for 12th Avenue;
- ◆ Further refinement of the Transportation Management Program (TMP); and
- ◆ Adjustments to and clarification of the alley vacation process.

II. GOALS, MISSION AND OBJECTIVES

II. A. PURPOSE OF THE MAJOR INSTITUTION MASTER PLAN

City Council adopted Seattle University Major Institution Master Plan by Ordinance #117667 in 1997, and it remains in effect today. The Master Plan proposal and alternatives are meant to: 1) reflect Seattle University programmatic needs; 2) address community input provided during public meetings held on the Master Plan and during EIS scoping (February and March 2008), and during the comment period on the Draft EIS (May and June 2009); and 3) to respond to input from the CAC's public meetings.

II. B. SEATTLE UNIVERSITY MISSION

Seattle University's stated mission is the following:

"Seattle University is dedicated to its mission of teaching and learning, education for values, preparation for service, and growth of the whole person. The university's curriculum has been designed to emphasize the development of human values and the exploration of ethical implications of personal and professional activities across students' lifetimes"

"Seattle University is dedicated to educating the whole person, to professional formation, and to empowering leaders for a just and humane world."

II. C. MASTER PLAN OBJECTIVES

The primary Seattle University Master Plan goals and objectives are summarized as follows:

- ◆ Strengthen the vitality of the academic community as a setting for student life. The campus should integrate learning and student development. Additional student housing should be provided to increase the residential population in order to strengthen the university experience and minimize impacts to surrounding neighborhoods.

Enhance the University's mission, identity, and visibility within the community with volunteer programs and internships with the community. The physical campus needs to be enhanced to reflect these collaborations and to increase the presence and visibility of the university within the community and the City of Seattle.

- ◆ Assure the capacity to meet foreseeable and long-term space needs for the identified current and future need for academic space, student housing, support space and parking.
- ◆ Promote a positive working relationship with the community by working with neighborhood groups and the community-at-large to communicate the needs of the institution, understand the needs of the community, and to provide opportunities for meaningful interaction regarding campus development.
- ◆ Incorporate the principles of sustainable design in all aspects of site and building design, construction, maintenance, and operation. Sustainability principles supporting this goal are:
 - Incorporate sustainable design approaches into the design of all physical campus elements
 - Conserve non-renewable natural resources
 - Make sustainable features visible and available as learning and teaching opportunities
 - Build structures for permanence and quality as well as flexibility
 - Design new and renovation projects to meet LEED standards
- ◆ Activate 12th Avenue and other corridors to improve the university's physical connection to the neighborhood. The university will seek to improve all the edges of campus to facilitate better integration into the surrounding neighborhood areas and a positive interface with the community.
- ◆ Create a clear and gracious arrival experience and accommodation for members of the university community and visitors with good way-finding to reflect the institutions' openness to public interaction and access.
- ◆ Employ the campus landscape to bring a unified campus character to the University with a cohesive network of open spaces and pathways replacing the former grid of city streets upon which the main campus was developed.
- ◆ Increase pedestrian safety at arterial crossings to connect the campus and reduce safety hazards with improved pedestrian connections.

III. MASTER PLAN ELEMENTS

III. A. MAJOR INSTITUTION OVERLAY DISTRICT

The proposed MIO District would be irregularly shaped and would include the existing Seattle University campus. The campus is situated between East Madison to the north, East Jefferson Streets to the south and Broadway to the west. The campus is bound on the east by 12th, 14th, and 15th Avenues. See Figure 1.

Two MIO boundary expansion areas are included along Broadway. The northern area would be zoned MIO-160, consistent with the higher heights along the Broadway corridor between Seattle University and Swedish Hospital. The southern expansion area along Broadway would be zoned MIO-90. The third boundary expansion area includes the current site of the Photographic Center Northwest (PCNW) and its parking lot to the east as well as the remainder of the block bounded

by E Marion to the north and 13th Avenue to the east. The PCNW parcel fronting on 12th Avenue would be zoned MIO-65 consistent with the other heights along that arterial. Consistent with the underlying LR-3 zoning, the expansion area west of 13th Avenue would be zoned MIO-37. This area includes the parking lots for the Photographic Center Northwest as well as five townhouses already owned by SU. See Figures 1 and 3.

III. B. DEVELOPMENT PROGRAM

The Seattle University owned property within the existing MIO boundary is approximately 47.9 acres with an approximate total building area of 2,044,000 square feet. The proposed expansion of the MIO boundary is by 2.4 acres (for a total of 57.3 acres) with an approximate building area of 4,189,000 square feet.

The Master Plan proposes both planned and potential development consistent with Major Institution code requirements (SMC 23.69.030). The Master Plan contemplates near and long-term development timeframes and further divides the near-term timeframe into planned and potential developments. Seattle University has stated that timing for long-term developments are estimates, and are subject to change.

Near-Term Development

The Seattle University Master Plan near-term development includes both planned and potential development. Near-term *planned* development refers to projects with definite plans to construct in the next ten years and possibly by 2013. Near-term *potential* development is less defined, but could be constructed in the next ten years and possibly by 2016. This development includes both new construction and renovation of existing structures. Both the planned and potential near-term projects are described in Figure 4. For the purposes of phasing, the planned near-term is considered Phase One and the potential near-term projects are considered the Phase Two.

Planned and Potential Near-Term Development Plans				
Planned Near Term Projects & Renovations (0-10 years)	Net Additional Square Footage	Proposed Building Height (ft)	New or Renovation	Expected Completion
101 1313 E Columbia Renovation*	0	40	Renovation	2009
102 1215 E Columbia / Academic (Seaport Building) *	5,000	30	Both	2010
103 824 12th Avenue Building (Admissions & Alumni Bldg)*	5,000	15	Both	2009
104 Library Addition *	35,000	40	Both	2010
105 12th & E Cherry Housing *	160,000	50	New	2011
106 Academic & Housing at 12th & E Madison	55,000	105	Both	2011
107 Administration Building (10th & E Madison)	0	45	Renovation	2011
108 Connolly Center at E Cherry & 14th	80,000	40	Both	2011
109 New Logan Field Underground Parking	130,000	40	New	2012
110 New Logan Field Retail	30,000	40	New	2012
111 Xavier Global House	5,000	35	Both	2013
Total New SF	505,000			
* These projects are permitted under the existing 1997 MIMP.				
Potential Near Term Projects & Renovations (0-10 years)	Net Additional Square Footage	Proposed Building Height (ft)	New or Renovation	Targeted Completion
201 Academic Building at 10th & E Columbia	100,000	65	New	2011
202 Academic & Housing on 12th Ave & E Spring	95,000	105	New	2012
203 Bellarmine Hall on 12th Ave	0	105	Renovation	2013
204 Academic & Law School Expansion	120,000	75	New	2013
205 Bannan Science	50,000	65	New	2013
206 Columbia and Broadway Building	350,000	160	New	2015
207 Campion Hall Renovation	0	130	Renovation	2014
208 Garrand	0	45	Renovation	2016
209 Casey	0	65	Renovation	2016
210 Loyola	0	55	Renovation	2016
Total New SF	715,000			

Figure 4. Planned and Potential Near-Term Development Plans

Long-Term Development

Long-term potential development describes those projects that could be constructed as needs arise and funding becomes available. Such development would occur in the 2017-2027 year timeframe. See Figure 5 for the list of the long-term potential development projects. The long-term potential development is considered Phase Three.

Potential Long-Term Development Plans				
Potential Long Term Projects & Renovations	Net Additional Square Footage	Proposed Building Height (ft)	New or Renovation	Targeted Completion
301 Student Housing / Office / Mixed Use at 13th Avenue	185,000	65	New	2017
302 12th & E James Retail	15,000	30	New	2018
303 Academic and Student Services, Addition to Student Center Pavilion (11th Avenue & E Columbia Street)	25,000	30	New	2019
304 Green Over Parking	0	n/a	New	2019
305 Student Center (entrance onto E James)	0	n/a	Renovation	2019
306 Student Center	25,000	50	New	2020
307 Academic & Housing on E Madison	75,000	105	New	2020
308 Academic Building at Broadway & E Madison	100,000	65	New	2023
309 Executive Education / Conference & Events (12th Avenue & E Marion Street)	25,000	50	New	2025
310 Campion Ballroom	20,000	40	New	2026
311 Addition to Connolly Center	85,000	65	New	2026
312 1313 E Columbia	280,000	65	New	2027
313 824 12th Avenue	90,000	65	New	2027
Total New SF	925,000			

Figure 5. Potential Long Term Development Plans

Street and Alley Vacations

In addition to the construction of the projects outlined above, the applicant is proposing the partial vacation of one street, partial vacation of three alleys and one full alley vacation. See Figure 6.

- Partial Street Vacation – East Columbia Street East of Broadway** – This is approximately a 176-foot segment of East Columbia Street (66-foot width) – extending east of Broadway. The segment of East Columbia Street that adjoins the proposed vacation and extends eastward of this street segment was vacated in 1965 (Vacation Ord. #93852). This proposed vacation is intended to help integrate development along Broadway with the University campus.
- Partial Alley Vacation – Between East Columbia and East Cherry Street** – This is an approximate 180-foot segment of the north-portion of the alley (16 ft. wide) that is located between East Columbia Street and East Cherry Street (immediately east of Broadway). Like the segment of East Columbia Street (described above), this vacation is proposed to help integrate

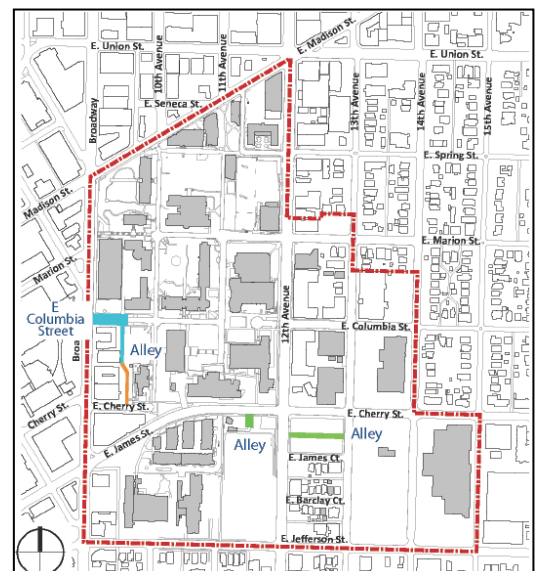


Figure 6. Proposed Alley and Street Vacations

development along Broadway with the University campus. The University will not petition the City to vacate this alley until it owns the adjacent properties or has the consent of the adjacent property owners.

- **Partial Alley Vacation – South of East Cherry Street** – An approximate 40-foot segment of a 16-foot wide alley between 11th Avenue (extended) and 12th Avenue immediately south of East Cherry Street received conceptual City Council approval in 2003 in conjunction with the existing MIMP. The balance of this alley between the proposed segment and East Jefferson Street was vacated in 1922 (Vacation Ord. #43433). The purpose of this vacation is to provide for redevelopment of this block in conjunction with planned Near-Term projects: New Logan Field Underground Parking and New Logan Field Retail. It is anticipated that final approval of this pending vacation may occur prior to adoption of the proposed MIMP.
- **Partial Alley Vacation** -- An approximate 185-foot segment of the south-portion of the 16-foot wide alley that is located between East Columbia Street and East Cherry Street (immediately east of Broadway) is proposed for vacation. Like the previously-proposed vacation for the north-portion of this alley, it is intended that this vacation could help integrate development along Broadway with the University campus.
- **Alley Vacation – Between 12th Avenue and 13th Avenue** -- An approximately 252-foot long alley (10 ft. wide) that extends between 12th and 13th Avenues received conceptual City Council approval in 2003 in conjunction with the existing MIMP. The purpose of this vacation is to provide for redevelopment of this block in conjunction with planned Near-Term project: 12th & East Cherry Housing, a five-story, approximately 160,000 square feet building (MUP #3009390). It is anticipated that final approval of this pending vacation will occur prior to adoption of the proposed MIMP.

III. C. DEVELOPMENT STANDARDS

The Final Master Plan discusses Seattle University's proposed development standards on pages 99-127. Consistent with SMC 23.69.030, the development standards would modify and supersede the underlying zoning standards. Specifically, Seattle University proposes to replace the underlying LR-3, NC2-40 and NC3-85 zoning development standards with the Master Plan development standards pursuant to the major institutions code (SMC 23.69).

Height

New MIO heights are proposed along Broadway between E Cherry Street and E Columbia Street (MIO 160, See Figure 1, Area B) as well as between E Marion Street and E Jefferson Street (MIO 90, See Figure 1, Area C) along the eastern portions of campus. The central portion of campus bordered by 12th Avenue on the east is proposed to remain at MIO 105. Across 12th Avenue, the proposed new zones include MIO 37 and MIO 65 (See Figure 1, Area A).

Modulation

New modulation standards are proposed for building facades located five feet or less from the public right-of-way to be consistent with underlying zoning. However, no modulation of building facades will be required where structures abut or are located across the right-of-way from other university-owned property and no modulation of building facades will be required along 12th Avenue in areas zoned MR (west side of 12th Avenue).

Setbacks

Where university-owned parcels are situated directly across from one another on a right-of-way or where adjacent to other commercial or institutional uses, a zero foot (0') setback is proposed. Street-level setbacks are proposed along boundaries abutting residential zones. These setbacks vary and have been individually prescribed based on the specific abutting condition. The Final MIMP outlines these setbacks on page 111. Subsequent to the Final MIMP and FEIS, in October 2011, the University, in response to concerns raised by the public and CAC, proposed revised development standards for the setbacks of the two blocks fronting on 14th Avenue, at the eastern edge of the MIO boundary. These changes are referred to as the Revised Final MIMP – October 2011. The two blocks are located at 1300 East Columbia Street and 1313 East Columbia Street. The changes are summarized below and in Figures 7 and 8:

1313 East Columbia Street (site of Coca Cola Building, a designated historic landmark)		
	Final MIMP – June 2011	Revised Final MIMP – October 2011
Ground Level Setback from east PL, along 14 th Ave	15'	15'
Upper Level Setback (above 40') from east PL, along 14 th Ave	40'	80'
1300 East Columbia Street (site of Laundry Services Building)		
	Final MIMP – June 2011	Revised Final MIMP – October 2011
Ground Level Setback from east PL, along 14 th Ave	15'	15'
Upper Level Setback (above 40') from east PL, along 14 th Ave	40'	60'
Ground Level Setback from north PL	15'	15'
Upper Level Setback (above 40') from north PL	40'	40'

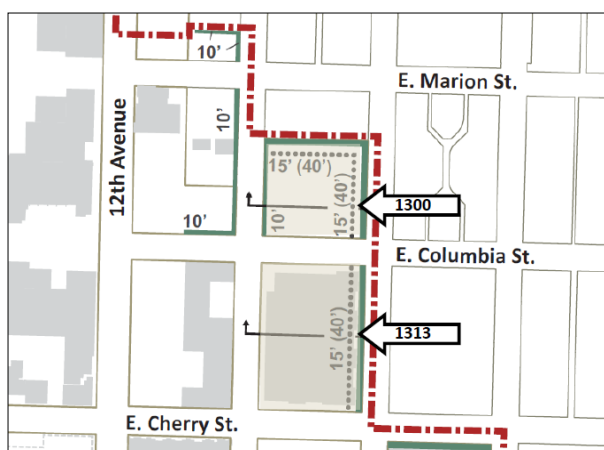


Figure 7. Setbacks in Final MIMP – June 2011

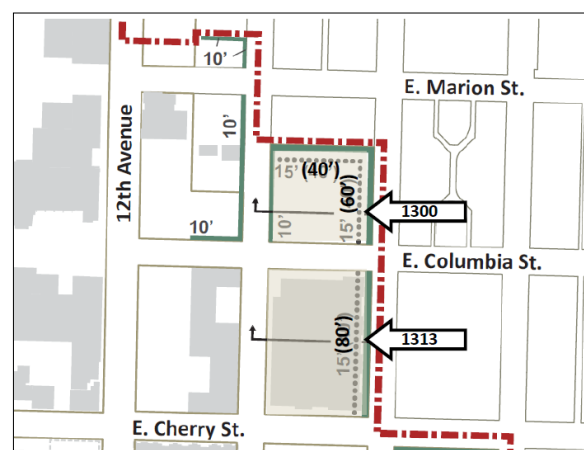


Figure 8. Setbacks in Revised Final MIMP – October 2011

This report uses this most recent proposal as the basis for the analysis of the proposed Master Plan.

Lot Coverage

Seattle University proposes an institutional lot coverage limit of 50 percent.

Landscaping, Open Space, and Pedestrian Circulation

Seattle University proposes in the Final Master Plan that a minimum of 40% of the property owned by Seattle University within the MIO District shall be retained in lawns, planting beds, plazas, malls, walkways, and athletic fields and courts. A minimum of half of this area will be maintained as landscaped open spaces, including athletic fields. The Final MIMP proposes that Seattle University will not be required to follow the provisions of the Green Area Factor. The Final MIMP proposes three designated open spaces defined as open space that is “significant and serves as the focal point for users of the Major Institution”. Additional open space may include increased setbacks, landscaping, street narrowing and pocket parks.

Parking

Seattle University presently has approximately 1,529 parking spaces in 15 facilities (surface and structured). With the exception of 10 parking spaces that are leased from Swedish Medical Center's Cherry Hill Campus and 15 spaces that are leased at the Broadway Deck, all are located within the University's existing campus boundaries. It is proposed that during the Near-Term the amount of campus parking be increased by 526 spaces (approx. 34 percent) from 1,529 parking spaces to 2,055 spaces. (These facilities are depicted in Figure 2-13 of the FEIS). For the Long-Term phase, it is proposed that the total on-campus parking be reduced by approximately 10 percent from 2,055 to 1,868 spaces, which equates to a net increase of 339 spaces more parking spaces than currently exist and 187 fewer spaces than would occur during the Near-Term. DPD does not anticipate maximum on-campus parking to exceed 2,055.

III. D. TRANSPORTATION MANAGEMENT PROGRAM

The Final Master Plan gives details of the proposed TMP on pages 158-166 and in Section 3.8 of the Final EIS. The proposed enhanced TMP is a modified continuation of the current TMP. The plan describes required details consistent with the major institution code, including the intent, location, authority, goals, HOV incentive, program elements, participants' responsibility, evaluation criteria and procedures. The TMP is consistent with DPD Director's Rule 14-2002.

III. E. PHASING AND EIS ALTERNATIVES

The Master Plan proposes project phasing, dependent on funding and need. The three phases are described under Section III.B of this report. The Master Plan describes growth phases generally; specific phasing timelines and scopes may shift somewhat. The Master Plan would remain in place until Seattle University completes the Plan's scope and constructs the allowed developable square footage.

The Final EIS includes six alternatives:

- Proposed Action
- No Student Housing (Alternative 1)
- No Alley Vacation (Alternative 2)
- NO MIO Boundary Expansion (Alternative 3)

- No Height Increase East of 12th Avenue (Alternative 4)
- No Action

Seattle University has selected the Proposed Action as its Final Master Plan.

IV. ANALYSIS – MAJOR INSTITUTION MASTER PLAN

IV. A. PURPOSE AND INTENT

This section addresses the Purpose and Intent of Seattle's land use regulations for Major Institutions pursuant to SMC 23.69.002. Each criterion is shown in **bold** and analysis follows each criterion, and relies upon all sources of information developed as part of the referenced code requirements, including both the Final Master Plan and Final EIS.

A. Permit appropriate institutional growth within boundaries while minimizing the adverse impacts associated with development and geographic expansion;

The University anticipates a 36% increase in overall enrollment over the 20-year planning period, and a 54% increase in the percentage of undergraduates living on campus. The University believes that enrollment expansion is necessary to remain competitive and viable as an institution, while increasing the percentage of on-campus housing is important to its educational mission. In addition, increasing on-campus housing provides environmental benefits such as reduced commute trips and lower carbon emissions. The increased development capacity and limited boundary expansion depicted in the MIMP accommodate the University's anticipated growth with controlled impacts on the surrounding neighborhood.

The MIMP includes a boundary expansion of 4.4%, to accommodate an increase in development capacity for the campus, and a number of planned and potential new buildings. This program will result in a significant increase in the amount of floor area and total square footage of the campus. This increase in floor area (205%), as analyzed in the FEIS, included mitigation for short-term and long-term impacts from planned and potential growth outlined in the MIMP. The FEIS does not anticipate significant adverse environmental impacts, but the MIMP development program nevertheless includes mitigation to protect several elements of the environment during and after any new construction planned in the MIMP.

For the following elements of the environment, the FEIS identifies mitigation and/or identifies no significant adverse impacts from growth under the Master Plan:

- Air quality and global climate change
- Plants
- Environmental health and noise
- Land Use and Relationship to Plans/Policies/Regulations
- Aesthetics
- Light/Glare/Shadows
- Historic Resources
- Transportation, Circulation, and Parking
- Construction-Related Impacts
- Housing

See Section VI of this report for analysis of the environmental impacts and mitigation.

B. Balance a Major Institution's ability to change and the public benefit derived from change with the need to protect the livability and vitality of adjacent neighborhoods;

Much of the development under the MIMP will take place in the heart of campus, away from sensitive residential uses. All five of the planned near-term development projects that are east of 12th Avenue have already occurred under the existing MIMP. Of these five projects, one was a renovation (MIMP, page 45, #101), three were renovations and minor expansions (MIMP, page 45, #102, 103 and 108) and the fifth was new construction at the corner of 12th Avenue and East Cherry Street (MIMP, page 45, #105). All of the remaining 16 development projects that are planned and potential for the near term (within the next ten years) are located west of 12th Avenue, on the central campus.

Of the 13 long-term development projects, four projects are located east of 12th Avenue. One of these four is an addition to the Connolly Center (MIMP, page 49, #311); another is an addition to a building along 12th Avenue (MIMP, page 49, #313). The third project is a new structure on the 1300 East Columbia site (MIMP, page 49, #301).

The final project located east of 12th Avenue is a build out of the block located at 1313 East Columbia Street (MIMP, page 49, #312), across from a residential zone outside of the MIO boundary. This site has received considerable attention from the CAC, public and institution which has resulted in increased upper level setbacks, a specific height measurement that limits the height of any new development. Furthermore, this site contains a historic landmark, the Coca Cola Building, and thus the ability to modify and/or add on to the existing building is regulated by the Landmarks Preservation Board.

Of particular concern to the community is one of the three alternative development schemes proposed at this site: an event center to accommodate 5,000 people. Such a use poses potential unique traffic, parking, noise, and scale impacts which could affect the livability and vitality of the residential community to the east. The FEIS does not contain an analysis of the impacts associated with an event center. These impacts would have to be analyzed on a project specific basis at the time a Master Use Permit application is submitted.

DPD Recommendation -- These conditions are reiterated in Section VII.

① Page 51, add the following text at the end of the page as follows:

“Prior to any decision by Seattle University to move forward with a Master Use Permit application for an event center, the following studies, reviews and steps shall be required:

- 1) A full parking and traffic analysis, a site specific light and glare study and a noise analysis shall be completed for review by the Standing Advisory Committee;
- 2) An evaluation of alternative campus locations shall be completed for review by the Standing Advisory Committee; and
- 3) The proposed project shall be presented to the community at a widely advertised meeting at the conceptual design phase.
- 4) As part of any Master Use Permit or SEPA review, the Standing Advisory Committee shall be given the opportunity to review and comment on the project during the schematic and design development phases.”

New development is mostly separated from potential impacts to surrounding neighborhoods due to geography (most of campus is downhill from surrounding areas to the west and east), other Major Institutions (Swedish main campus to the west and Swedish Cherry Hill to the east), and arterials nearly encircling the MIO. Those residential areas along the perimeter of the MIO boundary are protected by ground-level building setbacks of between 10-15 feet, an additional upper-level building setback of 60 or 80 feet for all portions of structures over 40 feet, and building height limits ranging from 37 feet to 65 feet. A particularly challenging condition is where the MIO boundary abuts private property that is zoned residential. This occurs in one location along 13th Avenue, and extends between 13th and 14th Avenue between East Columbia and East Spring Streets. Here, the MIO abuts a Lowrise zone that is developed with residential uses. The mitigation for such a condition is partially addressed with the ground level and upper level setbacks and height measurements outlined later in this report. However, the quality of this setback space is critical to a sensitive transition; therefore DPD recommends the following condition.

DPD Recommendation -- These conditions are reiterated in Section VII.

❶ The indented sentence under Landscape Screening on page 121 shall be amended as follows: “Screening shall be provided wherever parking lots or parking structures abut a public right-of-way or are located along a MIO boundary. For all structures, located along a MIO boundary that is not a public right-of-way and where the underlying zoning is residential, landscape screening shall be provided.”

Increasing on-campus living furthers the University’s mission to strengthen the vitality of the academic community. The University’s mission includes providing volunteer and internship opportunities to get students into the community in helpful roles. Currently, over 70% of the student body participates in community service; a percentage the University expects will remain consistent or increase as University enrollment and residential student population increase.

In addition to the reduced bulk and scale impacts from the proposed facilities through these transitional heights and building setbacks, the Master Plan specifically addresses proposed protections and enhancements to the livability of adjacent neighborhoods with the continued enhancement of open spaces, landscaping, further investing in the Transportation Management Program and its corollary benefits to the surrounding neighborhood, and emphasis on new development on the existing campus.

Seattle University proposes to relate the campus to its surroundings through a variety of open spaces and improved pedestrian circulation routes across the campus, intended to connect with transit and the surrounding community. These strategies should continue to enhance the campus’ physical connection to the community. The Master Plan intends to improve livability and vitality of adjacent neighborhoods by opening and enhancing these spaces.

Seattle University proposes to focus all of the new planned and potential near term development and most of the long-term potential development projects on the central campus, away from the residential low-rise zoned areas to the north and east. The relatively lower topography of the MIO overlay east of 12th Avenue facilitates diminished bulk impacts on surrounding residential neighborhoods. The Master Plan and FEIS identify and analyze increases in traffic, height, bulk and scale impacts resulting from growth of the institution. The Master Plan and related environmental documents evaluate a series of mitigating measures to address potential impacts.

Growth and change represented by the Master Plan will affect the nearby neighborhoods. The Plan represents more vehicle trips on existing roadways, more active use of the expanded campus, and more substantial buildings in areas currently occupied by lower scaled structures and surface parking areas. In the FEIS, DPD recognizes the impacts associated with Seattle University proposed development. However, DPD concludes that the adjacent residential neighborhoods and their associated neighborhood businesses are not likely to decline as a result of the Plan, and will continue to be the livable, vital communities currently in evidence. In that regard, the Master Plan successfully meets this goal.

C. Encourage the concentration of Major Institution development on existing campuses, or alternatively, the decentralization of such uses to locations more than two thousand five hundred (2,500) feet from campus boundaries;

The University will concentrate its development almost entirely on the existing campus. The planned and potential development outlined in the MIMP is largely confined to the existing boundaries of the MIO. Expansion proposed in the MIMP is limited, amounting to a 4.4% increase in MIO area. The University indicates that decentralization of institutional uses is inconsistent with its institutional goals and therefore the MIMP does not propose any additional decentralization beyond the 9,000 square-foot University facility currently operating in Bellevue.

D. Provide for the coordinated growth of major institutions through major institution conceptual master plans and the establishment of major institutions overlay zones;

The Master Plan itself and supporting documents provide for this goal.

E. Discourage the expansion of established major institution boundaries;

The Master Plan proposes to expand slightly the University's MIO boundaries, and therefore poses a potential conflict with this stated goal. However, the proposed expansions provide improved edge conditions and more recognizable boundaries. The MIMP reduces impacts to the immediate neighborhood by concentrating development within the existing campus boundaries and proposing no near- or long-term projects for the expansion areas. The no-expansion alternatives explored in the FEIS (No MIO Boundary Expansion Increase Alternative and the No Action Alternative) did not adequately serve the University's institutional goals or development needs.

SMC 23.34.124 B (designation of MIO districts), discussed in more detail below, speaks to the question of appropriate Major Institutional boundaries:

- *Boundaries shall provide for contiguous areas which are as compact as possible within the constraints of existing development and property ownership.*
- *Appropriate provisions of this chapter for the underlying zoning and the surrounding areas shall be considered in the determination of boundaries.*
- *Preferred locations for boundaries shall be streets, alleys or other public rights-of-way. Configuration of platted lot lines, size of parcels, block orientation and street layout shall also be considered.*

The proposed expansions on the west side of the MIO serve the goal of boundaries following public rights-of-way, in particular along Broadway and E. Jefferson Street. The expansion on the west side of campus carries with it a number of benefits to the campus and the community, including more appropriate height limits than those of the existing zoning, which differ dramatically from the MIO 240 foot height limits across Broadway.

The Master Plan represents a minor expansion of Major Institution boundaries. However, DPD considers the goal's intent to be the protection of established residential neighborhoods from unchecked geographic expansion by major institutions. DPD considers the Preferred Alternative to meet this intent, considering its relative advantages and its proposed package of mitigations and the conditions recommended in this report.

F. Encourage significant community involvement in the development, monitoring, implementation and amendment of major institution master plans, including the establishment of citizen's advisory committees containing community and major institution representatives;

The Mayor and City Council appointed members of the CAC after significant outreach to the surrounding business and residential community. Through public meetings, public notice, acceptance of public comment, and a public hearing, Seattle University, the CAC, the Department of Neighborhoods and DPD have encouraged significant involvement in the evolution of the Master Plan and formulation of the Environmental Impact Statement.

Seattle University submitted and DPD published its Notice of Intent in February 2008, as required by SMC 23.69.032 B. In addition, Seattle University and DON conducted outreach to stakeholders in the residential and business community. The following is the list of CAC members appointed initially, including City and university staff:

CAC Member	Neighborhood	Category
Maria Barrientos	N/A	Citywide Representative
Loyal Hanrahan, Vice Chair	12th Avenue	Works or Owns Property in the Area (Seattle Academy of Arts and Sciences)
Paul Kidder	N/A	Seattle University Faculty, Non-management representative of Seattle University
James Kirkpatrick	First Hill, Capitol Hill	Representative of Community Group (First Hill Improvement Association)
Betsy Mickel	First Hill	Works or Owns Property in the Area (Northwest Kidney Center)
Marcia Peterson	N/A	Representative of Adjacent Institution (Swedish Medical Center)
John Savo, Chair	Squire Park	General Community; Architect
Ellen Sollod	Squire Park, 12th Avenue	Neighbor
Mark Stoner	Pike/Pine	Owner of Property or Business in the area; Architect
Bill Zosel	Squire Park	Neighbor

Ex-Officio Members		
Steve Sheppard	N/A	Department of Neighborhoods
Lisa Rutzick	N/A	Department of Planning and Development
Joy Jacobson	N/A	Seattle University
Robert Schwartz	N/A	Seattle University
Past Members		
Betsy Hunter	Capitol Hill	Representative of Community Group
Tanaya Wright	Squire Park	Neighbor
Darren Reddick	N/A	Representative of Adjacent Institution (Swedish Medical Center)
Paul Chiles		General Community

See Resolution 31070 (July 14, 2008) approving composition of CAC and incorporating by reference Memorandum of Agreement between City and University (Feb. 28, 2008). Prior to the development of the Director's Report, The CAC held approximately 35 meetings to review and comment on the development of the MIMP, EIS, and CAC recommendations. Meetings were open to the public. In addition to notices required by the MIMP code, special notice was given to issue-focused stakeholders when meetings agendas were to cover their particular interests and concerns.

G. Locate new institutions in areas where such activities are compatible with the surrounding land uses and where the impacts associated with existing and future development can be appropriately mitigated;

Not applicable; Seattle University is an existing Major Institution.

H. Accommodate the changing needs of major institutions, provide flexibility for development and encourage a high quality environment through modifications of use restrictions and parking requirements of the underlying zoning;

The MIMP development program and standards are intended to meet the University's changing needs over the life of the MIMP. For additional information on development standards and modifications to standards of the underlying zoning, please see discussions under Sections C above and L, below.

I. Make the need for appropriate transition primary considerations in determining setbacks. Also setbacks may be appropriate to achieve proper scale, building modulation, or view corridors;

The arterials that coincide with the proposed MIO boundaries nearly surround the campus, including Madison (principal arterial) to the north, Broadway (minor arterial) to the west, East Jefferson (collector arterial) to the south, and 14th (collector arterial) and 12th (minor arterial) to the east, providing transitions to the adjacent neighborhoods. Development controls were included with the MIMP to reduce height bulk and scale impacts at campus edges, in particular for projects along the MIO's eastern border, the most sensitive boundary edge. Along the eastern MIO boundaries, the proposed ground-level setbacks are 15 feet; interior ground-level setbacks are 10 feet. In addition, MIO-edge buildings along the eastern boundary of campus will also provide upper-level setbacks of 60 and 80 feet for all portions of buildings higher than 40 feet above grade. See the Setback discussion in Section III.C of this report for greater detail. Integration of this information into the MIMP is recommended as conditions below. The MIMP

also proposes bulk and density standards, through the building modulation (consistent with the underlying zoning), floor area ratio restrictions (page 109) and street level development standards (MIMP page 116). Additionally, the MIMP contains design guidelines for campus development, listed in the Campus and Community Context section of the MIMP (pages 132-134). The EIS notes that design guidelines and development standards of the MIMP will guide redevelopment of the campus. Several of these guidelines were discussed during CAC deliberations and edits to the language were suggested to help clarify and integrate neighborhood considerations. See recommended conditions below. These regulations and standards, along with individual project review will serve to ensure compatibility among land uses.

DPD Recommendation -- These conditions are reiterated in Section VII.

Pursuant to the analysis above, DPD recommends that Council condition its approval of the Final MIMP to update the setback dimensions proposed as part of the Revised Final MIMP – October 2011 in the final document.

❶ On page 111, the graphic shall be amended to reflect the upper level setback of 80' for the 1313 E Columbia site and 60' for the 1300 E Columbia site per the Final MIMP – October 2011 and reflected in Figures 8 through 12.

❷ On page 115, Sections C and D shall be amended to reflect the updated upper level setbacks and height per the Final MIMP – October 2011.

The proposed design guidelines language shall be amended as follows:

❸ On page 132, add the following to the first paragraph:

“That in the design of any Seattle University building, facing either 12th Avenue, Madison or Broadway, Seattle University designers should strive to provide major entries, possible entry plaza, other fenestration, and street activating uses and features in order to avoid any building appearing to “turn its back” to the street front. Design of buildings should not treat the street fronts as back yards.”

❹ On page 133, design guideline #2 shall be deleted.

❺ On page 133, design guideline #4 (now #3) shall be amended as follows:

“Avoid literal interpretations of historically designated buildings when designing new buildings.

❻ On page 133, design guideline #6 (now #5) shall be amended as follows:

“Develop detailing that conveys a building’s function, contemporary use of technology, and the nature of materials, structure, and systems used. Details should also address scale related to the pedestrian.”

❼ On page 133, design guideline #7 (now #6) shall be amended as follows:

“New architecture should respond to the University’s expressed values and standards of excellence in design and material character.”

❽ On page 133, new design guideline #11 shall be added as follows:

“New designs should demonstrate sensitivity to the grain and scale of the existing surrounding development.”

⑨ On page 133, new design guideline #12 shall be added as follows:

“Seattle University plans should include special provisions to activate the streetscape along 12th Avenue, Madison and Broadway through transparency, visible activity, small pedestrian plazas, defined entries at grade level height and should include recognition that 12th Avenue and Broadway in particular have a different character than the other streets in the neighborhood.”

⑩ On page 133, design guideline #15 (now #16) shall be amended as follows:

“Circulation of all modes of access to a building (including services) must not deteriorate the surrounding campus or neighborhood.”

J. Allow an increase to the number of permitted parking spaces only when it is 1) necessary to reduce parking demand on streets in surrounding areas, and 2) compatible with goals to minimize traffic congestion in the area;

The MIMP (pages 65-69) discusses parking quantity, location, and access. Parking requirements for Major Institutions are found in SMC 23.54.016, which establishes minimum long-term and short-term parking requirements based on the number of students and employees present during peak hour plus the number of resident students. In addition, this code provides a maximum parking allowance of 135% of the minimum parking requirements.

Based on the current facilities and staff as detailed in SMC 23.54.016, the minimum parking requirement for the University is 1,416 spaces and the maximum is 1,912 spaces. The documented supply of 1,529 falls within the required range.

For planned projects, the minimum parking required by code will be 1,644 spaces and the maximum 2,219 spaces. The proposed near-term plan will provide approximately 2,055 parking spaces. The proposed long-term plan will provide approximately 1,868 parking spaces. This approximates the estimated minimum long-term requirement of 1,876. The small difference between the projected number of spaces and the estimated minimum long-term requirement is less than the daily fluctuation in actual parking demand. The MIMP indicates that the University will meet minimum parking requirements in the long term through expanded supply or leasing. The University will maintain the minimum amount of parking required to support university operations while minimizing impacts to the surrounding community.

Further analysis at the time of any one project must occur to determine if parking that is being reduced by removal of existing facilities causes the parking supply to fall below the minimum, as it may result in conditioning the project to retain or provide additional parking to address any short term reductions in parking that fall below these minimums.

A goal of the University's TMP is to “maintain the minimum parking supply necessary to support campus operations while minimizing impacts to the surrounding community.” (MIMP page 163). To reach that goal, the University supports existing Residential Parking Zones (“RPZ”) and works with RPZ neighbors and partners to improve the effectiveness of City enforcement. The University will work with SDOT and neighborhood groups to manage on-street parking. Seattle University has documented its successful record of reducing its relative impact by promoting transportation alternatives. The proposed TMP describes measures intended to reduce SOV trips to its campus. Considering this established record and the added measures to be implemented over the course of the proposed Master Plan, DPD considers this goal's second criterion to be adequately met.

- K. Use the TMP to reduce the number of vehicle trips to the major institution, minimize the adverse impacts of traffic on the streets surrounding the institution, minimize demand for parking on nearby streets, especially residential streets, and minimize the adverse impacts of institution-related parking on nearby streets. To meet these objectives, seek to reduce the number of SOVs used by employees and students at peak time and destined for the campus;**

The TMP requirements are generally discussed in the MIMP with specific analysis in the FEIS, based on the existing program, which appears to be satisfactory to address traffic impacts as well as any parking related impacts. The University reports success in reducing the rate of single occupancy vehicle commutes from 53% in 1995 to 39% in 2007. The goal for the proposed TMP is 35% SOV commutes, lower than the Code-required 50% SOV goal. In addition, the University is proposing in the MIMP to construct additional student housing on campus which will have the effect of reducing student commuter trips to and from campus.

The 1997 Master Plan adopted an aggressive TMP that included goals, expressed as a percentage of the campus population that arrives via a SOV, of 55% for commuter students, 60% for faculty, and 40% for staff. Progress towards these goals was measured through electronic surveys of the campus population that were conducted in 1995, 2001, and 2007. The TMP for the proposed Final MIMP would maintain all of the primary elements of the 1997 TMP and include several new initiatives. Key elements of the proposed TMP include the following (see page 2-39 of the FEIS):

1. A minimum transit subsidy of 50% of the cost of transit passes for faculty and staff and 30% of the cost of commuter student transit passes. (MIMP, page 159-160)
2. Increased subsidies for VanPool program participants and additional services to bicycle commuters and pedestrians.
3. A more comprehensive marketing program that will promote the program's benefits and opportunities to the campus population on a regular basis.
4. Parking will be priced so the cost of making a single occupant vehicle commute trip is greater than the cost of making the same trip by transit. It is the difference between the benefit of a subsidized transit pass and the expense of parking fees and vehicle operating costs that will increase the percentage of the campus population that will take transit.
5. Continued coordination with First Hill institutions to improve transit access and pursue mutually beneficial programs to reduce single occupant vehicle trips.
6. Commitment to link institutional policies for sustainability with trip reduction.

DPD and SDOT recommend these TMP mitigations be conditions of the MIMP approval by Council. See Section VII.

L. Through the master plan:

- 1) **give clear guidelines and development standards on which the major institutions can rely for long-term planning and development;**

The MIMP establishes development standards governing setbacks, height, lot coverage, open space and other related development standards consistent with those found in the underlying zoning of the MIO. Height and setbacks are addressed in more detail below regarding requested rezones. The University will be able to rely on the guidelines and standards of the MIMP to plan the long-term functionality of the campus.

2) provide the neighborhood advance notice of the development plans of the major institution;

Following the appointment of the CAC by the City Council, DPD published and distributed notice of opportunities for comment, in accordance with Code. Outreach included large signs located along each property frontage, mailing to property owners within 300' of the project site, and publication in the City's Land Use Information Bulletin. See Procedural Milestones section of this report. Over the course of the Master Plan's execution, the process provides for advance notice as individual projects proceed through their respective Master Use Permit reviews.

3) allow the city to anticipate and plan for public capital or programmatic actions that will be needed to accommodate development;

As required by the Major Institution code, DPD sent notices of the Draft and Final EIS and Master Plan to City departments, including Fire, Transportation, Neighborhoods, Public Utilities, City Light and Human Services. On various occasions, DPD involved staff from SDOT during its review of the proposed TMP and associated transportation mitigations.

4) provide the basis for determining appropriate mitigating actions to avoid or reduce adverse impacts from major institution growth; and

The master planning process includes citizen involvement as well as the involvement of agencies with jurisdiction in drafting and commenting on the MIMP and EIS. This includes disclosure of impacts and evaluation of mitigation, leading to the recommended conditions.

This report lists recommended conditions below in Section VII.

M. Encourage the preservation, restoration and reuse of designated historic buildings.

The MIMP identifies potentially historic buildings within the MIO, including the former Coca-Cola bottling plant at 1313 East Columbia (already designated a historic landmark under the City's Historic Preservation Ordinance) and the Lynn Building along East Madison Street (neither designated nor nominated). The University pledged in the MIMP to work with the Landmarks Preservation Board prior to developing the Lynn building site. The University will follow the recommendations and guidance of the Board.

IV. B. REPORT AND RECOMMENDATION OF THE DIRECTOR

This section shows in **bold** the requirements of the Director's Report and recommendation on the Final Master Plan pursuant to SMC 23.69.032 E. Analysis follows each criterion, and relies upon all sources of information developed as part of the referenced code requirement, including both the Final Master Plan and Final EIS.

E1. Within five (5) weeks of the publication of the final master plan and EIS, the Director shall prepare a draft report on the application for a master plan as provided in Section 23.76.050, Report of the Director.

DPD published its notice of availability of the Final Master Plan and EIS on June 2, 2011. DPD completed this draft and submitted it to the CAC in November 2011.

E2. In the Director's Report, a determination shall be made whether the planned development and changes of the Major Institution are consistent with the purpose and intent of this chapter, and represent a reasonable balance of the public benefits of development and change with the need to maintain livability and vitality of adjacent neighborhoods. Consideration shall be given to:

- a. The reasons for institutional growth and change, the public benefits resulting from the planned new facilities and services, and the way in which the proposed development will serve the public purpose mission of the major institution; and**
- b. The extent to which the growth and change will significantly harm the livability and vitality of the surrounding neighborhood.**

The planned development and changes of the Major Institution, with the Director's recommendations, are consistent with the City's Major Institution Policies and Land Use Element of the Comprehensive Plan. Provided that the proposed Final Master Plan is appropriately mitigated, approval would foster a reasonable balance of the public benefits of development and change with the need to maintain livability and vitality of adjacent neighborhoods. This report summarizes mitigation in the form of recommended conditions to be included in approval of the Final Master Plan.

Seattle University has designed its proposed growth to reduce and remove impediments in its physical plan that limit its ability to meet its mission. Currently, Seattle University has 6,765 students. To meet its projected need, Seattle University plans to add 2,436 students over the next 20 years, bringing the total student count to approximately 9,200.

Seattle University stated mission:

"Seattle University is dedicated to its mission of teaching and learning, education for values, preparation for service, and growth of the whole person. The university's curriculum has been designed to emphasize the development of human values and the exploration of ethical implications of personal and professional activities across students' lifetimes."

"Seattle University is dedicated to educating the whole person, to professional formation, and to empowering leaders for a just and humane world."

To understand how this mission statement meets the intent of developing new MIMP's, SMC 23.69.002 provides some direction with language that describes the purpose and intent of the Major Institution code. Please refer to the *Purpose and Intent* section of this Report.

Seattle University's projected growth in the student body and corresponding faculty and staff results in an increased pressure to a limited campus area. The area limits imposed in the existing Master Plan restrict Seattle University ability to grow in a reasonable way. The Master Plan

directs growth and change at the institution by expanding the physical campus and defining generally the future facility improvements. In order to achieve Seattle University's mission, the Major Institution Master Plan process has focused on alternatives that increase height limits on the existing campus or expand the campus.

In addition to the identified public benefits inherent to Seattle University core mission, this analysis considers other public benefits related to the proposed expansion and adopted in the Final Master Plan, such as the enhanced Transportation Management Program measures and maintenance and enhancement of the open spaces and landscaping throughout campus that are enjoyed by the wider community. DPD considers these benefits to be integral to the proposed expansion, addressing public benefits relevant to both the City's major institution policies.

Public comment throughout the MIMP process repeatedly addressed the issues of principal concern to the neighborhood: impacts of increased height, bulk and scale of development east of 12th Avenue, at the edges of the MIO boundaries and encroachment of the campus on the adjacent residential neighborhood.

The Master Plan identifies physical improvements to grounds and facilities, intended to be sensitive to neighborhood impacts surrounding growth and change. The proposed accessory parking, improvements to existing facilities, as well as new development are all parts of the campus infrastructure deemed necessary to fulfill Seattle University's mission. The Master Plan also includes pedestrian, bicycle and transit improvements, as well as public access to on-site open space and landscaped areas. Seattle University proposes to designate as permanent open space 57% of an expanded campus.

E3. In the Director's Report, an assessment shall be made of the extent to which the Major Institution, with its proposed development and changes, will address the goals and applicable policies under Education and Employability and Health in the Human Development Element of the Comprehensive Plan.

The following policies and goals specifically pertain to the development and implementation of the MIMP:

- *HDG4 Promote an excellent education system and opportunities for life-long learning for all Seattle residents.*
- *HDG5 Promote development of literacy and employability among Seattle residents.*
- *HD19 Work with community colleges, universities and other institutions of higher learning to promote life-long learning opportunities for community members and encourage the broadest possible use of libraries, community centers, schools, and other existing facilities throughout the city, focusing on development of these resources in urban village areas.*
- *HD20 Work with schools and other educational institutions, community-based organizations, and other governments to develop strong linkages between education and training programs and employability development resources.*
- *HDG6 Create a healthy environment where community members are able to practice healthy living, are well nourished, and have good access to affordable health care.*
- *HD21 Encourage Seattle residents to adopt healthy and active lifestyles to improve their general health and well-being. Provide opportunities for people to participate in fitness and recreational activities and to enjoy available open space.*

The MIMP (pages 20-21) describes how the MIMP meets the goals of the Human Development element of the Seattle Comprehensive Plan goals listed above. One element of the University's mission is to further the creation of a just and humane world, and to that end, the University encourages its students to engage in volunteer activities. Over 70% of the University's students participate in volunteerism.

Seattle University strives to be a leader in sustainable practices for its grounds, buildings, operations, and education. It is devoted to respecting and caring for a healthy environment in the community. This means creating a campus that is friendly to animals and humans, reducing the campus' impact on the environment and educating individuals to have a global awareness. These practices are included in curriculum for future nurses, educators, engineers, scientists, business leaders, and policy makers. In addition, the physical structure of campus, with its pedestrian orientation, its open spaces, and its educational facilities, helps the community and the City at large comply with the policies above.

E4. The Director's analysis and recommendation on the proposed master plan's development program component shall consider the following:

- a) **The extent to which the Major Institution proposes to lease space or otherwise locate a use at street level in a commercial zone outside of, but within two thousand, five hundred (2,500) feet of the MIO District boundary that is not similar to a personal and household retail sales and service use, eating and drinking establishment, customer service office, entertainment use or child care center, but is allowed in the zone. To approve such proposal, the Director shall consider the criteria in Section 23.69.035 D3;**

The university does not currently lease residential space outside of the MIO boundary. The following non-residential spaces and parking are currently leased by the university within 2,500 feet of the MIO boundary:

Non-residential space:

- 21,000 sf at James Tower (near Swedish - Cherry Hill)
- 5,000 sf at 1001 Broadway
- 550 sf at the Pacific Northwest Research Institute

Parking:

- 10 spaces at Swedish - Cherry Hill
- 15 spaces at the Broadway Deck

Seattle University proposes to continue to lease space as allowed pursuant to SMC 23.69.022.

- b) **The extent to which proposed development is phased in a manner which minimizes adverse impacts on the surrounding area. When public improvements are anticipated in the vicinity of proposed Major Institution development or expansion, coordination between the Major Institution development schedule and timing of public improvements shall be required;**

Seattle University proposes to expand the campus in three phases over approximately twenty years. Seattle University has designated the first phase as planned physical development in the near term. The Master Plan designates Phase Two as potential physical development in the near-term and Phase Three as potential long-term development. The timing of each phase is not necessarily dependent on major public improvements in the vicinity of the site.

The FEIS addresses phasing in Section 2.4.2 on pages 2-19 through 2-25. The Final Master Plan identifies project phases on pages 42-49. The FEIS projects construction of Phase 1 to occur in the next ten years and possibly by 2013. The anticipated construction schedules for the potential physical development for Phase Two is within ten years and possibly by 2016. Phase Three is the potential long-term development to occur by 2027 as needs arise and funding becomes available.

At the time of project-level permitting, the University will coordinate with any public agencies constructing improvements in the vicinity of the MIO. SDOT recommends that Concept Streetscape Design Plans are developed for Broadway and Madison Street, similar to the streetscape design plan included in the MIMP for 12th Avenue, prior to development along these corridors. The plan elements are described in the recommended conditions below.

DPD Recommendation -- These conditions are reiterated in Section VII.

● Concept Streetscape Design Plan for Broadway and Madison. Within three years of MIMP approval, the University will prepare and submit to DPD and SDOT for their approval conceptual streetscape design plans for (1) the east side of Broadway between Madison Street and Jefferson Street and (2) the south side of Madison between Broadway and 12th Avenue, similar to the conceptual plan for 12th Avenue depicted at pages 142-143 of the MIMP. The University will work with the City and other property owners to identify public and private funding sources to implement the concept plans over time.

The plans shall be prepared consistent with the provisions of the Seattle Right-of-Way Improvements Manual. Elements of the plan must include, but are not limited to: street-level setbacks/land uses and pedestrian environment, private/public realm interface, pedestrian level lighting, way-finding, streetscape furniture, landscaping and tree selection. The plans shall also address all Pedestrian Master Plan priority improvement locations and facilities identified in the Bicycle Master Plan. Where there are bike lanes and right turn only lanes at the same corner, evaluate the feasibility of National Association of City Transportation Officials-standard bicycle facilities.

Once completed, these plans shall be considered during review of any applications for permits to improve any development site adjacent to Broadway or Madison.

- c) **The extent to which historic structures which are designated on any federal, state or local historic or landmark register are proposed to be restored or reused. Any changes to designated Seattle Landmarks shall comply with the requirements of the Landmarks Preservation Ordinance. The Major Institution's Advisory Committee shall review any application to demolish a designated Seattle Landmark and shall submit comments to the Landmarks Preservation Board before any certificate of approval is issued;**

As discussed above, there is one development site containing a designated historic structure on the existing campus: 1313 E Columbia Street (also known as the Coca-Cola Building, Qwest Building, and 711 14th Avenue E). The historic Coca Cola Bottling Plant (Qwest Building) went through the nomination process and was designated as a City of Seattle landmark in August 2008. Ordinance No. 123294 describes the features of the landmark to be preserved and outlines the Certificate of Approval process for changes to those features.

Any development at this site will proceed in accordance with the incentives and controls imposed on the property by the City Council through the Ordinance. For a building designated as a City of Seattle landmark, changes to the designated features of the building will be reviewed by the Landmarks Preservation Board as a part of the Certificate of Approval process. The Landmarks Preservation Board reviews Certificates of Approval to ensure that change is managed in a way that respects the historical significance of the designated landmark. Some members of the CAC have expressed interest in historic nomination of the Lynn Building along E Madison Street. On page 126 of the Final MIMP, it states that when the university moves forward with Master Use Permit (MUP) application for development that would include the demolition or substantial alteration to a building 50 years or older and/or public comment suggests that the building is historic, a referral will be made to the City's Historic Preservation Officer, pursuant to the City's SEPA policies as established in SMC 25.05.675H or the University may submit a landmark nomination application to the Landmarks Preservation Board in advance of the MUP. No other existing buildings within the MIO are currently designated landmarks.

d) The extent to which the proposed density of Major Institution development will affect vehicular and pedestrian circulation, adequacy of public facilities, capacity of public infrastructure, and amount of open space provided;

The FEIS addresses the impacts on vehicular and pedestrian circulation, adequacy of public facilities, capacity of public infrastructure, and open space. The impacts of the proposed density of the University on circulation, public facilities, infrastructure, and open space will be adequately mitigated in the MIMP and by SEPA mitigation identified in the FEIS. Each element is discussed below.

Proposed Density

In accordance with the Major Institutions Code at SMC 23.69.030.E.2, density on campus is calculated using Floor Area Ratio ("FAR"). The Final Master Plan calculates FAR over the entire campus and does not apply specific FAR limits to individual sites, consistent with other master plans. Currently, the FAR for the campus is 0.90. At full build-out, the FAR will increase to 1.79 (4,189,000 square feet). This is lower than the surrounding development, much of which has a FAR of 4.0 or higher. The University will not exceed an FAR of 2.5. Lot coverage is proposed to increase from 29% to 39%. The details of the impact of the increased density are discussed in the MIMP (pages 109-119).

Vehicular and Pedestrian Circulation

Circulation issues are chiefly discussed in the MIMP on pages 58-63 and in various places in the FEIS. The University campus west of 12th is currently, and will remain at full build-out, largely a pedestrian space. The University campus currently has 13 primary pedestrian access points,

including several along 12th Avenue. The MIMP calls for maintaining all existing pedestrian access points and adding two new points along 12th. The new Logan Field parking facility will require a new mid-block crossing at E James/E Cherry.

The University has set a goal of reducing SOV usage to 35%, well below the goal of 50% set by the SMC, thus reducing total vehicular traffic. The University currently has five primary vehicular access points, which the MIMP proposes to retain. The University intends to strengthen some access points both to improve campus identity and the sense of arrival for campus visitors. This will include signalization of the primary visitor access at the intersection of East Marion Street and 12th Avenue.

Seattle University already includes pedestrian pathways available for students, neighbors and the public to access and, where appropriate, to cross the campus. The University's proposed circulation improvements would allow for improved definition and clarity of circulation routes to ease wayfinding. The FEIS addresses additional mitigation for traffic and parking impacts associated with both planned and potential development, to be implemented at the time of new development.

DPD Recommendation -- These conditions are reiterated in Section VII.

❶ Develop a bicycle access plan for the proposed campus, including existing neighborhood bicycle facilities, bicycle parking locations, parking quality (covered, publicly accessible), number of stalls at each location, and bicyclists' wayfinding.

a) On Page 62, add text at end of page describing plan.

Include new graphic showing the following:

b) bicycle access throughout campus; and

c) locations of bicycle parking (including covered and/or secured bicycle parking) throughout campus, noting bicycle parking available to visitors at key locations.

Adequacy of Public Facilities

The MIMP discusses planned infrastructure improvements on pages 88-90. It is anticipated that the existing infrastructure, together with the improvements outlined in the MIMP, will be adequate to serve the expansion contemplated in the MIMP.

Several bus stops are located within a quarter mile of the Major Institution Master Plan boundaries which have a very high number of on/off boardings (e.g., Madison/Broadway, Madison/Boren, 9th/Jefferson, Broadway/Jefferson). These boardings are expected to increase as a result of the proposal. Therefore, DPD and SDOT recommend the following condition.

DPD Recommendation -- These conditions are reiterated in Section VII.

❶ DPD and SDOT recommend that, when a MIMP project is proposed and is subject to SEPA review, the scope of SEPA analysis include an evaluation of potential impacts on nearby transit facilities.

Capacity of Public Infrastructure

It is anticipated that existing utilities will be adequate to serve the expansion.

Open Space

The MIMP discusses open space and landscaping, landscape plans and designated open spaces on pages 120-125. The University intends to continue its award-winning landscape program. Currently, 55% of the campus is maintained in useable open space. Despite the increased floor area associated with the planned and potential development projects, the MIMP anticipates the percentage of open space to increase to 57% at full build-out. Some of this increase will result from the construction of an underground parking garage at the site of the current East Marion Street surface parking lot, with open space above.

Future development on the campus is not proposed to comply with the Green Factor standards. However, a minimum of 40% of the property owned by Seattle University within the MIO District shall be retained in lawns, planting beds, plazas, malls, walkways, and athletic fields and courts. A minimum of half of this area shall be maintained as landscaped open spaces, including athletic fields. The open space and landscaping standards shall not apply to individual lots, building sites, or sub-areas within campus, but the campus as a whole.

The MIMP prescribes that landscape screening shall be provided wherever parking lots or parking structures abut a public right-of-way. Maintaining and adding street trees along campus edges is proposed on page 122 of the MIMP. Three designated open spaces have been identified in the MIMP: Union Green, The Quad and the Plaza of the St. Ignatius Chapel. Future open space has also been identified and divided into planned and possible categories (see page 125 of the MIMP).

With the exception of Championship Field, most all of the existing and designated open spaces on the campus are located on the west side of 12th Avenue. Given the intensification of university uses east of 12th Avenue and the adjacency to the residential neighborhood, more specific designation of open spaces is warranted to provide relief from the built university environment, density and height. The MIMP (page 125) identifies five possible open space areas that would be integrated into future development, three of which are on sites already owned by SU. Greater certainty regarding such future open space development east of 12th Avenue is needed to achieve the balance of density versus open space that is enjoyed on the central campus, as well as to transition to the lower density neighborhood context.

DPD Recommendation -- These conditions are reiterated in Section VII.

❶ The following paragraphs shall be added to Future Open Space (page 125) as follows:
“Neither the short or long term development plans propose future development on the 1300 East Columbia site (not currently under university ownership). Given the sensitive edge condition of this site, high-quality, welcoming open space shall be provided prior to or simultaneously with development at 1300 East Columbia Street consistent with the requirements of this condition. This open space shall be publicly accessible and urban in character, providing relief both visually and in the activities offered. Elements of these spaces shall include, but are not limited to, landscaping, hardscaping, seating, artwork, trash receptacles and irrigation. The Admissions and Alumni courtyard just east of 12th and Marion provides an example of such high-quality open space.

In the event that a development footprint equal to or greater than 45,000 square feet on the 1300 E. Columbia Street site is proposed, Seattle University shall submit a plan for review by the CAC that shows Seattle University's actual open space plan for this site. Prior to issuance of a Master Use Permit at the 1300 East Columbia site, the University shall present the open space plan to the Standing Advisory Committee for review and comment, and obtain DPD approval of the plan. Provision of this open space shall be a requirement of development approval of the plan."

② The following paragraphs shall be added to Future Open Space (page 125) as follows:
"Given the sensitive edge condition of the site located at 1313 East Columbia (#312), high-quality, welcoming open space shall be provided prior to or simultaneously with development at this site consistent with the requirements of this condition. This open space shall be publicly accessible and urban in character, providing relief both visually and in the activities offered. Elements of these spaces shall include, but are not limited to, landscaping, hardscaping, seating, artwork, trash receptacles and irrigation. The Admissions and Alumni courtyard just east of 12th and Marion provides an example of such high-quality open space.

In the event that a development footprint equal to or greater than 75,000 square feet on the 1313 E. Columbia Street site is proposed, Seattle University shall submit a plan for review by the CAC that shows Seattle University's actual open space plan for this site. Prior to issuance of a Master Use Permit at the 1313 East Columbia site, the University shall present the open space plan to the Standing Advisory Committee for review and comment, and obtain DPD approval of the plan. Provision of this open space shall be a requirement of development approval of the plan."

③ The legend and graphic on page 125 shall be amended to include the following information:
Asterisk within Circle in New Color X for 1300 East Columbia – Planned Open Space Publicly Accessible (If Acquired)

Asterisk within Circle in New Color Y for 1313 East Columbia – Planned Open Space Publicly Accessible (SU Owned Land)

- e) **The extent to which the limit on the number of total parking spaces allowed will minimize the impacts of vehicular circulation, traffic volumes and parking in the area surrounding the MIO District.**

The Seattle Municipal Code restricts parking supply to 135% of the minimum required amount. As stated in the MIMP (page 166) and FEIS (page 3.8-8 through 3.8-14), under current conditions, the current supply of 1,529 stalls is under the maximum allowable parking supply of 1,912 spaces and greater than the 1,416 minimum required parking. At full build-out of planned and potential projects, the maximum allowed parking will rise to 2,533. The University will be required to provide parking within the projected minimum and maximum range. In addition, should there be additional demand warranting further mitigation, the University proposes to construct additional parking or leasing needed spaces in off-site parking lots.

The analysis in the FEIS supports the amount of parking to be provided to address both parking and transportation impacts. The FEIS discloses traffic and parking impacts. DPD recommends conditioning to limit these impacts pursuant to SEPA authority, as discussed in Section VI below.

E5. The Director's analysis and recommendation on the proposed master plan's development standards component shall be based on the following:

- a) The extent to which buffers such as topographic features, freeways or large open spaces are present or transitional height limits are proposed to mitigate the difference between the height and scale of existing or proposed Major Institution development and that of the adjoining areas. Transitions may also be achieved through the provision of increased setbacks, articulation of structure facades, limits on structure height or bulk or increased spacing between structures;**

The majority of the MIO boundary is buffered from adjoining areas by arterials and geographic separation. The MIO is in the valley between First Hill and Cherry Hill. The MIO slopes up to the western boundary at Broadway, a minor arterial. Across Broadway to the west is the Swedish Medical Center main campus MIO, featuring large-scale development with a 240-foot height limit. The underlying zoning across Broadway is Midrise, Neighborhood Commercial and Commercial. The principal arterial of East Madison Street separates the MIO from the Neighborhood-Commercial zone to the north.

The collector arterial of East Jefferson Street separates the MIO from the Midrise and Neighborhood-Commercial zones to the south. The underlying zoning across Jefferson is Midrise and Neighborhood Commercial. Across the easternmost portion of the MIO boundary along 15th Avenue, the underlying zone is Single Family and Lowrise 3 and an overlay of the Swedish Cherry Hill MIO-65.

With the exception of the Swedish Cherry Hill MIO to the southeast of the University, the uses to the east of the MIO are largely residential. Zoned Multifamily Lowrise of various intensities (LR1, 2 and 3), these residential structures require buffers to the taller and more intense institutional uses, especially across 14th and on those boundary edges that abut the non-right-of-way property. Given the proximity to lower and single family density at this edge, this is considered the most sensitive edge of the campus with regards to transitions. DPD recognizes this proposed transition to be the most disparate transitional relationship in height, bulk and scale, and finds the proposed setbacks and height measurement technique outlined as part of the Revised MIMP – October 2011 addresses these impacts. The MIMP proposes a ground-level, 15-foot setback for all new development along the eastern MIO boundary along 14th Avenue (the 1300 and 1313 East Columbia sites) and an upper-level, 60-foot and 80-foot setback for all portions of structures exceeding 40 feet in height. See further discussion of the setbacks in Section III.C. The depth of these setbacks, supplemented by the width of the adjoining rights of way, help to diminish the overall height of proposed campus buildings as perceived from nearby properties.

The underlying zoning across from the MIO boundary along 13th and 14th Avenues is Lowrise (LR) 1 and 3. The maximum height allowance of these zones is 35 feet in a Lowrise 1 zone and 45 feet in a Lowrise 3 zone. In Lowrise zones, the front setback ranges from five feet to five feet with a seven foot average. Side setbacks in Lowrise zones range from zero to five feet with a seven foot average. All setbacks proposed by Seattle University abutting or across the street from residential uses within the MIO boundary east of 12th Avenue exceed those required by the underlying zone.

Ultimately, future development must address concerns about how Seattle University interfaces with its streetscapes and the neighborhood, by incorporating human-scaled elements, modulation, and architectural features that communicate attention to human proportion and an appropriate transition from higher buildings to lower ones. In addition to the setbacks, the Final Master Plan includes proposed design guidelines for campus development on pages 132-134, as well as statements regarding campus edge improvements (page 135-137).

The Master Plan provides for campus development that is buffered from the residential Lowrise-zoned areas located along the campus' north, east and south sides, and provides proper transitions to nearby properties through appropriate separations, enhanced landscaping and open space.

- b) The extent to which any structure is permitted to achieve the height limit of the MIO District. The Director shall evaluate the specified limits on the structure height in relationship to the amount of MIO District area permitted to be covered by structures, the impact of shadows on surrounding properties, the need for transition between the Major Institution and the surrounding area, and the need to protect views;**

The development program laid out in the MIMP lists planned and potential projects with enough specificity that some of their potential impacts can be anticipated. The MIMP discusses lot coverage on pages 117-118. Chapter 3.6 of the FEIS presents a detailed shadow analysis for various times of day and year. The MIMP discusses building setbacks on pages 110-115. These discussions analyze these questions as far as the available information permits. Impacts from additional bulk and scale cannot be fully analyzed due to the preliminary conceptual level at which each building has been designed. The MIMP includes a set of design guidelines that will help address how building design will mitigate impacts from additional bulk and scale of new construction at specific sites. If necessary, additional consideration of potential bulk and scale impacts will occur at the time of MUP review of future projects.

Because the campus is in a valley, views in the area are generally limited and localized. There are no designated view corridors in the area although limited views do occur along public rights of way. None of these public views will be negatively affected by the development contemplated in the MIMP. Therefore Seattle University's proposed growth would have no impact in this regard. The Final Master Plan would affect no views from public rights-of-way or other public spaces.

On the existing campus, the MIO height limits would remain much as they are today, with structures regulated by the MIO 160 along the western edge and MIO 105 over the central part of campus. The height limits on the property at the northwestern quadrant of Columbia and 14th would be increased from 37 feet to 65 feet. The southwestern quadrant would be increased from 37 feet to 65 feet. The height limit on the area of campus generally east of 12th would increase from 37 feet and 50 feet to 37 feet and 65. Two sites include limited height restrictions. Figure 2 shows the existing MIO boundaries and height limits. Figure 3 shows both the existing MIO boundaries and the height limits, as well as the proposed boundaries and height limits.

The transition along 14th Avenue poses the most sensitive transitional relationship in height, bulk and scale, and DPD considers this to be a critical boundary edge. From the east, single family homes would be separated from the new development by the width of the street right-of-way of 14th Avenue, a 66-foot buffer. In addition, there is a 15 foot ground level setback and then upper level setbacks (above 37 feet) of 60 feet (on the 1300 East Columbia site) and 80 feet (on the 1313 East Columbia site). The 37 foot height approximates the heights allowed by the underlying Lowrise zones, as well as the current MIO height designation. It should also be noted that the topography rises across 14th Avenue to the east, so many of the existing structures would be around the same level or above the 37-foot height portion of the proposed structures. These upper level setbacks were proposed as part of the Revised Final MIMP – October 2011 and increased from 40 feet as stated in the Final MIMP – June 2011. The right-of-way width combined with the various setbacks provides for a significant transition to the LR1 and LR3 zoning on the east side of 14th Ave through increased setbacks (see Figures 7 and 8).

In October 2011, the CAC voted on increased setbacks and a massing alternative using a height measurement technique not currently contained in the Land Use Code. To ensure that the CAC-approved building envelopes complied with the 65-foot height designation proposed for the two sites, subsequent to that vote, the University re-calculated the height measurements pursuant to the Land Use Code prescribed measurement technique in SMC 23.86.006.A1 and further described in Director's Rule 9-2011. The University confirmed that these code-derived height measurement techniques resulted in a slightly larger envelope than was approved by the CAC. Therefore, the University proposed to limit heights at the two sites to the envelope approved by the CAC below the maximum Code-allowable envelope as follows:

1313 East Columbia Street

For the 1313 East Columbia site, the allowable building envelope for a development under the Code-measured 65- foot height limit would be set from the average grade plane of 280.54 feet, resulting in a maximum elevation of 345.54 feet. This is 0.4 feet taller than the height approved by the CAC in October 2011. Thus, development on this site may not exceed to 345.14 feet in elevation (excluding Rooftop Features per SMC 23.45.514.J). The height calculations are illustrated in Figures 9 and 10.

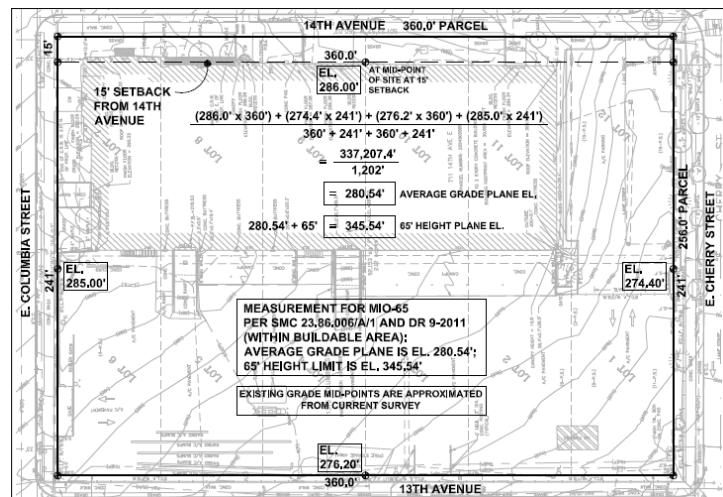


Figure 9. Height Calculation for 1313 East Columbia Site (north is to the left)

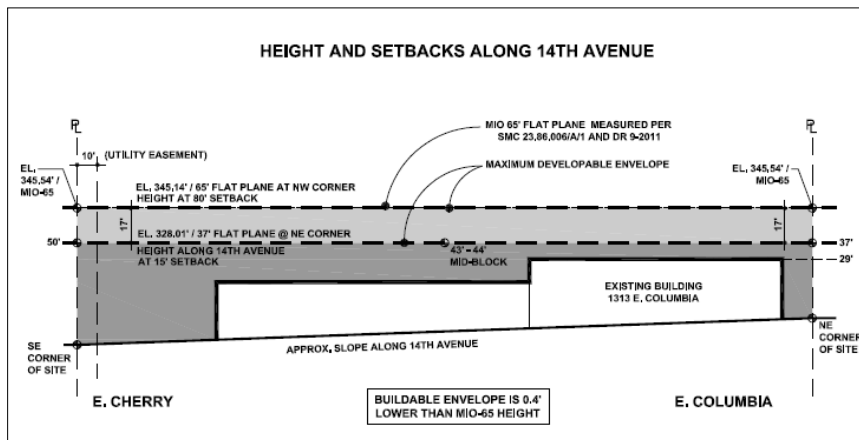


Figure 10. Height and Setbacks along 14th Avenue for the 1313 East Columbia Site

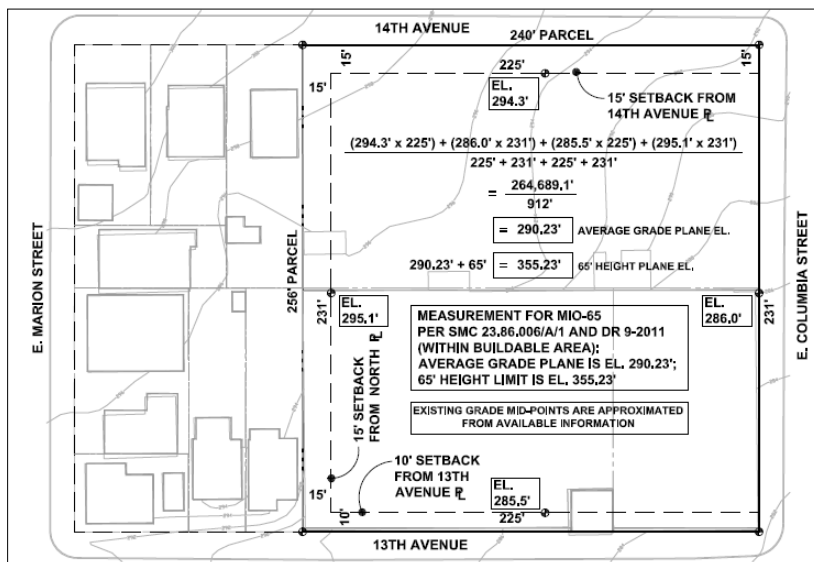


Figure 11. Height Calculation for 1300 East Columbia Site (north is to the left)

1300 East Columbia Street

The Final MIMP proposed a height of 55 feet for the site located at 1300 East Columbia Street. As part of the Revised MIMP – October 2011, the CAC approved a compromise proposal that increased the setbacks while raising the height of the allowable building envelope to 65 feet (from 55 feet) to make up square footage lost due to the increased setback. As explained earlier, the Code prescribed measurement technique results in a taller building envelope than approved by the CAC. For development on the 1300 East Columbia site, the 65 foot height limit would be set from the average grade plane of 290.23 feet in elevation, resulting in a maximum height of 355.23 feet in elevation or 8.93 feet taller than the envelope the CAC approved in October 2011. Thus, development on this site may not exceed to 346.3 feet in elevation (excluding Rooftop Features per SMC 23.45.514.J). The height calculations are illustrated in Figures 11 and 12.

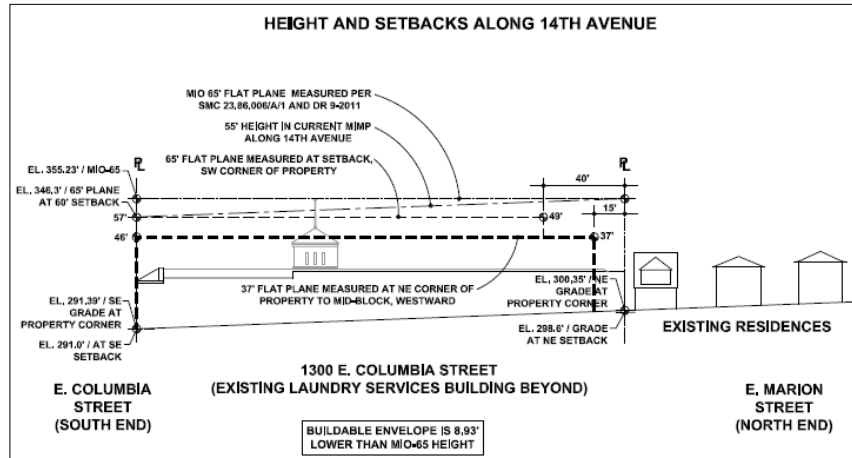


Figure 12. Height and Setbacks along 14th Avenue for the 1300 East Columbia Site

Pursuant to the analysis above, DPD recommends that Council condition its approval of the Final MIMP to update the height measurements proposed as part of the Revised Final MIMP – October 2011 in the final document.

DPD Recommendation -- These conditions are reiterated in Section VII.

- ❶ Update the graphics shown on pages 106 and 107 to show the 1313 East Columbia site with the height limit of 345.14 feet described on page 37 in this report and illustrated in Figures 9 and 10. The graphic call-out notes shall also be updated accordingly.
- ❷ Per the Final MIMP – October 2011, update the graphics shown on pages 106 and 107 to show MIO 65' at 1300 East Columbia site with the height limit of 346.3 feet described in this report on page 38 and illustrated in Figure 11 and 12. The graphic call-out notes shall also be updated accordingly.
- ❸ On page 108, for the 1300 East Columbia site, add Figures 11 and 12 of this report, along with the following text:

“The height measurement on all portions of the site for the upper levels (above 37') would be taken from an average grade plane of 290.23 feet, resulting in a maximum height of 355.23 feet. This is 8.93 feet taller than the CAC approved height in October 2011, so the height limit for this site would be limited to 346.3 feet in elevation.”
- ❹ On page 108, for the 1313 East Columbia site, add Figures 9 and 10 of this report, along with the following text:

“The 65 foot height limit shall be set from the average grade plane of 280.54 feet, resulting in a maximum height of 345.54 feet. This is 0.4 feet taller than the CAC approved height in October 2011, so the height limit for this site is 345.14 feet in elevation.
- ❺ On page 108, the following sentence shall be added to the paragraphs showing the measurement techniques for the 1300 and 1313 East Columbia sites.

“Given the sensitive boundary edge and transitional nature of these two sites, any development that proposes to exceed the height limit established for the 1313 East Columbia site (Project #101, page 45) or 1300 East Columbia site shall require a major amendment in accordance with SMC 23.69.035.”

DPD concludes that these specific height allowances foster an appropriate transition both the lower density residential zone to the east as well as the higher buildings proposed to the west. As currently proposed with the recommended conditions, DPD considers the Master Plan's design guidelines (page 132-134) to be appropriate for this stage of the planning process. The combination of the development standards and design guidelines will help shape the design of future development; however continued community based public participation is essential in considering the integration of future development. DPD recommends that this continued participation utilize the Standing Advisory Committee (SAC) structure and that this style of review comports with the duties and function typical of an SAC.

DPD Recommendation -- These conditions are reiterated in Section VII.

❶ Seattle University shall create and maintain a Standing Advisory Committee to review and comment on all proposed and potential projects prior to submission of their respective Master Use Permit applications. Any proposal for a new structure greater than 4,000 square feet or addition greater than 4,000 square feet to an existing structure shall be subject to formal review and comment by the Standing Advisory Committee (SAC). The Standing Advisory Committee (SAC) will use the Design Guidelines for evaluation of all planned and potential projects outlined in the Master Plan.

- c) The extent to which setbacks of the Major Institution development at the ground level or upper levels of a structure from the boundary of the MIO District or along public rights-of-way are provided for and the extent to which these setbacks provide a transition between Major Institution development and development in adjoining areas;**

Setbacks are discussed in the MIMP on pages 110-115. Generally, the MIMP requires 15-foot ground-level setbacks at the edges of the MIO and, where specified, 10-foot ground-level setbacks at the interior of the MIO. The proposed ground level setbacks generally adhere to or are in excess of the requirements of the underlying zone. At the MIO boundary along 14th Avenue, upper-level setbacks of 60 feet and 80 feet are provided. The ground- and upper-level setbacks specified provide an adequate transition between development under the MIMP and adjacent uses.

As discussed above, DPD recommends that Council adopt the conditions outlined in Section III.

- d) The extent to which the allowable lot coverage is consistent with permitted density and allows for adequate setbacks along public rights-of-way or boundaries of the Major Institution Overlay District. Coverage limits should ensure that view corridors through Major Institution development are enhanced and that area for landscaping and open space is adequate to minimize the impact of Major Institution development within the Overlay District and on the surrounding area**

The Major Institutions Code does not set a limit on allowable lot coverage, but the MIMP establishes an upper limit of 50%. The MIMP discusses lot coverage on pages 117-118. The lot coverage of the existing campus is 29%; at full build-out that number is expected to increase to 39%. This expected coverage, coupled with the 50% upper limit, allows for adequate setbacks

along public rights-of-way and MIO boundaries. It also allows the University to provide significant amounts of landscaping and open space. The proposed lot coverage limit would work in concert with proposed setbacks, FAR, open space, and height limits to provide for improved transitions in height, bulk, and scale to surrounding neighborhoods.

Generally, the plan calls for setbacks that are equal to or much greater than those required by the underlying zoning. There are no required view corridors across the campus, and the Final Master Plan proposes no new view corridors. However, taken together with recommended conditions, the proposed development standards, siting considerations, and the distribution of MIO height limits represent a reasonable strategy for mitigating the impact of Seattle University development.

- e) The extent to which landscaping standards have been incorporated for required setbacks, for open space, along public rights-of-way, and for surface parking areas. Landscaping shall meet or exceed the amount of landscaping required by the underlying zoning. Trees shall be required along all public rights-of-way where feasible;**

The MIMP addresses landscaping on pages 120-122. The University has an award-winning landscaping program and states its intent to continue its extensive landscaping. The MIMP includes areas for landscaping within designated setbacks. Street trees are provided for all arterials as well as streets internal to the campus. Street trees are required along all public rights-of-way. Page 120 of the MIMP states that “A minimum of 40% of the property owned by Seattle University within the MIO District shall be retained in lawns, planting beds, plazas, malls, walkways, and athletic fields and courts. A minimum of half of this area shall be maintained as landscaped open spaces, including athletic fields”. Additionally, the MIMP states that at full build out, the campus will have 57% open space. Seattle University proposes to continue the quality of its existing landscaping throughout campus and along its edges.

Because the “Green Factor” landscaping standards currently required by the underlying Commercial and Multifamily zoning districts address landscaping only at the project level while the MIMP guides growth campus-wide, the MIMP exempts the University from project-by-project compliance with the Green Factor. Nevertheless, the University’s extensive landscaping and open spaces provide more landscaping campus-wide than the minimum that would be required under a lot-by-lot Green Factor requirement. Given the University’s demonstrated commitment to providing quality open spaces, as well as the proposed increase in open space anticipated in the MIMP, it is reasonable to exempt the University from the Green Factor landscaping measurement techniques required by the underlying zoning.

- f) The extent to which access to planned parking, loading and service areas is provided from an arterial street;**

The campus currently contains five primary vehicular access points: two on 12th Avenue, one on East Cherry, one on Broadway, and one on East Jefferson. The first three streets are minor arterials while East Jefferson is a collector arterial. The planned and potential parking projects will not alter these primary access points. Only one parking facility is currently accessed from a non-arterial (13th Avenue) and will remain unchanged.

- g) The extent to which the provisions for pedestrian circulation maximize connections between public pedestrian rights-of-way within and adjoining the MIO District in a convenient manner. Pedestrian connections between neighborhoods separated by Major Institution development shall be emphasized and enhanced;**

The MIMP (pages 59-61) identifies the current and proposed system of pedestrian circulation. The MIMP proposes improvements to existing pedestrian access points as well as the creation of additional access points. Improvements include addition of a traffic signal at the primary vehicular and pedestrian access point at 12th and East Marion and improvements to access points on East Madison at 10th and 11th. New mid-block access points will be created along 12th. A new pedestrian crossing over East James is proposed at 11th. Finally, the MIMP plans a new access point at the intersection of Broadway and East Madison. The MIMP further supports improvement of pedestrian circulation through consideration of appropriate landscaping and open space.

The Master Plan's goal of creating green spaces, including opening the edges of campus to the community, facilitating circulation through the campus, and creating a more inviting, connective entrance to campus would serve to enhance and emphasize connections between campus and the neighborhood. These new and improved pedestrian access points, coupled with the extensive landscaping and open space network, will enhance pedestrian links with and between the surrounding neighborhoods.

See earlier recommended condition regarding development of a bicycle plan and repeated in Section VII.

- h) The extent to which designated open space maintains the pattern and character of the area in which the Major Institution is located and is desirable in the location and access for use by patients, students, visitors and staff of the Major Institution;**

Open space is discussed in the MIMP (pages 71-74). Currently, open space constitutes 55% of the campus area. Although lot coverage is expected to increase from 29% to 39%, the MIMP anticipates open space to increase to 57%, primarily due to replacement of surface parking with open space. The MIMP proposes a system of plazas, courtyards, and pathways to connect buildings with the surrounding public spaces around the campus. The MIMP also encourages that open spaces be enhanced through landscaping. Under the MIMP, new development would enhance open space, especially by creating larger, more usable community gathering areas over new parking facilities.

See discussion and related recommended conditions on pages 32 and 33.

- i) The extent to which designated open space, though not required to be physically accessible to the public, is visually accessible to the public;**

With the exception of the athletic facilities at Logan Field and Championship Field during athletic competitions/practices, pathways and designated open spaces will be physically accessible to the public. Even when they are unavailable for public use, however, the athletic facilities are visually accessible both from the right-of-way and from the areas that are open to the public.

See discussion and related recommended conditions on pages 33 and 34.

- j) **The extent to which the proposed development standards provide for the protection of scenic views and/or views of landmark structures. Scenic views and/or views of landmark structures along existing public rights-of-way or those proposed for vacation may be preserved. New view corridors shall be considered where potential enhancement of views through the Major Institution or of scenic amenities may be enhanced. To maintain or provide for view corridors the Director may require, but not be limited to, the alternate spacing or placement of planned structures or grade-level openings in planned structures. The institution shall not be required to reduce the combined gross floor area for the MIO District in order to protect views other than those protected under city laws of general applicability.**

The University is in a valley between First Hill, Capitol Hill, and Cherry Hill. Views are limited by topography and the presence of substantial urban development in all directions. The area contains no SEPA protected view corridors and no view corridor standards apply.

The University does have one designated landmark structure, the Coca-Cola Building at 1313 East Columbia. The MIMP proposes retention of the historic façades of this building, which front Columbia and 14th along the eastern edge of the MIO. Neither planned nor potential development projects described in the MIMP will affect views of these façades. All future changes/additions to this building and site will be reviewed by the landmarks Preservation Board.

E6. The Director's report shall specify all measures or actions necessary to be taken by the Major Institution to mitigate adverse impacts of Major Institution development that are specified in the proposed master plan.

Those measures found necessary to mitigate adverse impacts of the Major Institution are listed in Section VII of this report.

RECOMMENDATION – MAJOR INSTITUTION MASTER PLAN

The Director recommends **CONDITIONAL APPROVAL** of the proposed Major Institution Master Plan as conditioned in Section VII.

V. ANALYSIS – REZONE

V. A. BACKGROUND

The proposed MIMP includes MIO boundary expansion and revised MIO height limits. MIO boundary extensions are proposed in three areas as addressed in the Development Standards section of the Final MIMP:

1. **East of 12th Avenue.** This area includes both an expansion and increased height:
 - a. Expansion: The expansion of the MIO extends from 12th Avenue on the west to 13th Avenue on the east and from just north of East Marion Street on the north to north of East Columbia Street on the south. The parcel on the east side of 12th Avenue north of

East Marion Street is currently zoned NC2-40 and is proposed to be zoned NC2-40/MIO 65. The property located on the west side of 13th Avenue on either side of East Marion Street, the southern portion of which is a “notch” out of the northeastern boundary of the current MIO. This property is currently zoned LR-3 and is proposed to be zoned LR-3/MIO 37.

- b. **Increased Height:** The area east of 12th Avenue between East Marion Street on the north and East Jefferson Street on the south is currently MIO 37, 50 and 65. The area currently zoned MIO-37 and MIO-50 is proposed to be zoned MIO-65, with certain exceptions. The exceptions are as follows:
- portion of the Barclay Court area that will remain at MIO-37;
 - The property between 13th and 14th Avenues north of East Columbia (1300 East Columbia site) that is proposed for a MIO 65 zone per the Revised MIMP – October 2011 and limited to a lower height limit of 346.3 per the November amendment and outlined on page 38 (See Recommended Conditions 4 and 6); and
 - The 1313 East Columbia block that is currently proposed for a zone of MIO 65 with a height limit of 345.14 feet as outlined on page 37. (See also Recommended Conditions 3 and 7).

2. Along Broadway, North of Cherry Street. This area includes both an expansion and increased height:

- a. **Expansion:** The proposed expansion is bound by Broadway on the west (that is currently a “notch” out of the eastern boundary of the MIO), bordered by East Cherry Street on the south, an alley on the east, and extending north about one-half the distance between East Cherry Street and East Columbia Street. This property is currently zoned NC3-85 and is proposed to be zoned NC3-85/MIO 160.
- b. **Increased Height:** On the west boundary of the existing MIO along Broadway Avenue immediately south of East Columbia Street, the MIMP proposes an increase in height from MIO-105 to MIO-160 to be consistent with the MIO-160 property to the north along Broadway Avenue.

3. Along Broadway, South of Cherry Street. This area includes both an expansion and increased height:

- a. **Expansion.** The proposed expansion is bound by Broadway on the west, East James Street on the north, an alley on the east, and East Jefferson Street on the south. This property is currently zoned NC3-85 and is proposed to be zoned NC3-85/MIO 90.
- b. **Increase Height.** On the west boundary of the University along Broadway Avenue, the property bordered by East Cherry St. on the north and East James St. on the south (the “600 Broadway” property), the MIMP proposes a height increase from MIO-85 to MIO-90. The MIO-85 zoning designation was discontinued by the City and replaced with the MIO-90 zone.

The Final Master Plan depicts the proposed MIO boundary changes on page 106. The proposed overlay zoning changes are summarized as follows:

<i>Location</i>	<i>Existing MIO</i>	<i>Proposed Overlay Zoning</i>	<i>Proposed Height*</i>
East of 12th			
Expansion	n/a	MIO	37', 65'
Increased Height	MIO 37, 50, 65	MIO	37', 65'***
Broadway, North of Cherry			
Expansion	n/a	MIO	160'
Increased Height	MIO 105	MIO	160'
Broadway, South of Cherry			
Expansion	n/a	MIO	90'
Increased Height	MIO 85	MIO	90'

*Refers to base height limits. The Land Use Code and Master Plan allow exceptions for certain pitched roofs and other appurtenances.

**See Recommended Condition for MIO 90 for a portion of the MIO east of 12th Avenue.

The CAC delivered a letter outlining their comments and recommendations on the Draft MIMP and DEIS to DPD on January 9, 2009 (note that a typo was contained in the date of the letter, showing 2008). DPD staff has participated in the CAC's deliberations, and DPD recognizes the intent of the CAC's proposed development standards. As the CAC's discussion is ongoing, this report does not incorporate or respond to the CAC's most recent input.

V. B. ANALYSIS – GENERAL REZONE CRITERIA

The code sections from SMC 23.34.008 General rezone criteria are highlighted below in bold, with analysis following:

A. To be approved a rezone shall meet the following standards:

- 1. In urban centers and urban villages the zoned capacity for the center or village taken as a whole shall be no less than one hundred twenty-five percent (125%) of the growth targets adopted in the Comprehensive Plan for that center or village.**

The proposed zoning changes allow for greater zoned capacity, not less. Therefore, they will not result in a reduction of zoned capacity below this minimum.

- 2. For the area within the urban village boundary of hub urban villages and for residential urban villages taken as a whole the zoned capacity shall not be less than the densities established in the Urban Village Element of the Comprehensive Plan.**

The campus is located in an urban village. The proposed zoning changes allow for greater zoned capacity, not less. Therefore, they will not result in a reduction of zoned capacity below densities established in the Urban Village Element of the Comprehensive Plan.

B. Match Between Zone Criteria and Area Characteristics. The most appropriate zone designation shall be that for which the provisions for designation of the zone type and the locational criteria for the specific zone match the characteristics of the area to be rezoned better than any other zone designation.

All of the areas proposed for boundary extension are contiguous with the existing MIO boundaries and have the effect of “squaring off” the boundaries and, in some cases, eliminating “notches” in the boundaries.

Along Broadway Avenue, the proposed MIO zones in the extension areas are consistent with adjacent height limits. On the north, the proposed 160-foot height limit is consistent with the MIO-160 zoning adjacent to and north of the extension area. The property to the west across Broadway Avenue, which is part of the Swedish Medical Center MIO district is MIO zoned with heights ranging from 70 feet to 240 feet. On the south, the proposed MIO-90 zone is the MIO zone closest in height to the existing 85-foot height limit on the subject property as well as the property immediately across Broadway Avenue to the west. It is lower than the 105-foot zoning on the SU campus to the east.

Regarding the boundary expansion areas east of 12th, the proposed MIO zones are appropriate for those areas in conjunction with the setback development standards. For properties along 12th Avenue, the increase in height from 50' to 65' would be an appropriate transition from the MIO-105 to the west across 12th Avenue and will provide flexibility to implement mixed-use retail development. The proposed zoning height limits east of 12th (from 37' to 65' with the specific height limitations outlined earlier for two sites are also appropriate.

Much of the East James and East Barclay Court area would be retained in MIO-37 zoning to help maintain the small scale of this area. East of 13th, the proposed MIO-65 zoning south of East Cherry Street is consistent with the existing MIO-65 zoning further east on the Connolly Center block. On both the 1300 and 1313 East Columbia sites, the height limitations below the 65 foot zone and topographical changes, as well as the existence of a landmark structure at the 1313 East Columbia site will result in structure heights much lower than 65' along 14th Avenue across the street from existing single-family residences. These conditions, combined with the proposed upper-level setbacks, will maintain consistency with Lowrise zoning and the single-family and multi-family uses in the vicinity.

C. Zoning History and Precedential Effect. Previous and potential zoning changes both in and around the area proposed for rezone shall be examined.

The current proposed MIMP is the third MIMP for Seattle University. The City approved the first SU MIMP in 1989. In the first MIMP, the City approved certain boundary expansions, primarily east of 12th Avenue, and approved certain height increases primarily along Broadway and east of 12th Avenue. The City approved the second SU MIMP in 1997. In this MIMP, the City approved certain boundary expansions along Broadway, at the intersection of 12th Avenue and Madison Street, and east of 12th Avenue. The City also approved certain height increases along Broadway and east of 12th Avenue. The following is an abbreviated history of the zones where the current campus is located:

- In 1923, the area of the current campus was zoned Second Residence District and Commercial District.
- In 1947, the area of the current campus was zoned Second Residence District Business District and Commercial District.
- In 1957, the area of the current campus was zoned BN, RM, RMH, and CG.
- In 1982, the area of the current campus was zoned RMV.
- In 1985, the area of the current campus was zoned BC, MR, and CG.
- In 1986, the area of the current campus was zoned MR, NC3-65, and C1-65.
- In 1988, the area of the current campus was zoned MR, NC3-65, and C1-65 and then MR, NC3-40, NC3-65, NC3-85, C1-40, C1-65C2-65.
- In 1989, when the first MIO was established, the area of the current campus was zoned MR, NC3-65, NC3-85, C1-40, C1-65, and C2-65.
- In 1991, there was Central Area Remapping effort that results in following zoning designations for the area of the current campus: MR, NC3-40, NC3-65, NC3-85, C1-40, C1-65, and C2-65.

In the current proposed MIMP, the University is following this general trend of seeking boundary expansions to “square off” its boundaries, along Broadway and east of 12th Avenue. It is also seeking moderate height increases in these two areas. See Section I of this report for further detail.

D. Neighborhood Plans.

- 1. For the purposes of this title, the effect of a neighborhood plan, adopted or amended by the City Council after January 1, 1995, shall be as expressly established by the City Council for each such neighborhood plan.**

The Seattle University campus is located within the borders of the Central Area Neighborhood 12th Avenue Planning Area that was adopted and incorporated as part of the City's Comprehensive Plan.

- 2. Council adopted neighborhood plans that apply to the area proposed for rezone shall be taken into consideration.**

The following goals and policies from the Central Area Neighborhood Plan for 12th Avenue are the most applicable to proposed development of the Seattle University campus:

Policy CA-P1 – Enhance the sense of community and increase the feeling of pride among Central Area residents, business owners, employees and visitors through excellent physical and social environments on main thoroughfares.

Policy CA-P7 – Encourage use of travel modes such as transit, bicycles, walking and shared vehicles by students and employees, and discourage commuting by single occupancy vehicle. Minimize impacts of commuters on Central Area neighborhoods and neighborhood cut through traffic to and from the regional highway network. Work with institutions/businesses to develop creative solutions for minimizing auto usage by employees and students.

Policy CA-P15 – Encourage shared parking at business nodes in order to meet parking requirements while maximizing space for others uses with a goal to reduce the need for surface parking lots especially along key pedestrian streets.

The proposed rezones would permit new institutional development that would enhance the physical environments along main thoroughfares such as 12th Avenue, Madison Street, Cherry Street and Broadway. This development would include academic, housing, mixed-use and retail/commercial uses that would not only improve the physical environment, but also increase the amount of pedestrian activity in these areas. New housing development would reduce the number of students commuting to campus and thereby reduce the number of vehicular trips to campus. A new bicycle plan and enhanced TMP is recommended as part of this report, see Section VII.

Goal CA-G9 – A thriving mixed-use residential and commercial area with a “main street” including services and retail that is attractive and useful to neighborhood residents and students, and public spaces that foster a sense of community, near the intersection of several diverse neighborhoods and major economic and institutional centers.

Goal CA-P36 – Encourage increased housing density where appropriate, such as on 12th Ave. and on Yesler Way, and in mid-rise zoned areas.

Goal CA-P38 – Seek services and retail that builds on the neighborhood's proximity to Seattle University.

The increase in MIO height limits from 50' to 65' would provide additional incentive for development along the 12th Avenue corridor that would accommodate new University uses as well as mixed-use development. These new uses as well as the anticipated increases in student population (both commuter and resident students) would help to increase activity levels to support a thriving mixed-use commercial area. The vibrancy of 12th Avenue as a strong retail and pedestrian corridor has been discussed throughout the CAC deliberations. Concerns were expressed that some university-related uses located at street level may not add to the activation of 12th Avenue as other commercial uses generally encourage. DPD recommend the following conditions to address the uses allowed at street level along 12th Avenue.

DPD Recommendation -- These conditions are reiterated in Section VII.

❶ The last paragraph on page 116 shall be amended as follows:

“The underlying street-level development standards for commercial zones shall apply per SMC 23.47A.008 to all street facing facades in commercial zones within the MIO that are not designated as pedestrian streets. For pedestrian designated streets, the underlying street-level development standards for pedestrian designated streets in commercial zones shall apply per SMC 23.47A.008. For all street facing facades, the street-level designs shall also be shaped by the design guidelines outlined in the Campus and Community Context chapter.”

❷ On page 140, the street activating university uses list shall be amended as follows:

- ✧ campus bookstore
- ✧ child care facility
- ✧ coffee shop
- ✧ food service
- ✧ fitness center
- ✧ copy center
- ✧ theater / performing arts
- ✧ financial / banking center

- ✧ community meeting spaces
- ✧ campus /community service centers*
- * Service Center uses include but are not limited to activities such as community outreach; employment and employee services; public safety services including transit and parking pass distribution, lost and found, keys, and dispatch; student services; and counseling services.

③ On page 140, the last paragraph shall be amended as follows:

“For the site located at the northeast corner of 12th Avenue and E Marion Street (currently the Photographic Center Northwest), any potential university development on the parcel fronting on the pedestrian-designated 12th Avenue will comply with allowed uses per SMC 23.47A.005.D1 or those uses listed above as street activating university uses.”

④ The following paragraph shall be added to the end of page 140 as follows:

“Along 12th Avenue, non-street-activating uses shall be limited to no more than 20% of the 12th Avenue street front façade so as not to dominate any block.”

- 3. Where a neighborhood plan adopted or amended by the City Council after January 1, 1995 establishes policies expressly adopted for the purpose of guiding future rezones, but does not provide for rezones of particular sites or areas, rezones shall be in conformance with the rezone policies of such neighborhood plan.**

The Central Area Neighborhood Plan for 12th Avenue as adopted by the City Council does not include policies expressly adopted for the purpose of guiding future rezones, other than the policies discussed above, under D2.

- 4. If it is intended that rezones of particular sites or areas identified in a Council adopted neighborhood plan are to be required, then the rezones shall be approved simultaneously with the approval of the pertinent parts of the neighborhood plan.**

Not applicable.

E. Zoning Principles. The following zoning principles shall be considered:

- 1. The impact of more intensive zones on less intensive zones or industrial and commercial zones on other zones shall be minimized by the use of transitions or buffers, if possible. A gradual transition between zoning categories, including height limits, is preferred.**

The proposed rezone and the SU MIMP incorporate a gradual transition between zoning categories including height limits. On the west side of campus, the proposed MIO 160 zone is consistent with the MIO zoning on the Swedish property across the street which ranges from 70 to 240 feet, and it serves as a transition to the MIO 105 zone on the SU campus to the east. The proposed MIO 90 zone also serves as a transition between the NC3-85 zoning on the west to the higher MIO 105 zoning on the east. On the east side of campus, the height limits step down from the MIO 105 zoning in the central campus to the proposed MIO 65 zoning immediately east of 12th Avenue, and further steps down to 65-foot and 37-foot height limits with significant upper level setbacks before reaching the Lowrise zoning east of campus. See discussion in Section

III.C. The modified MIO 65 zoning on the 1313 and 1300 East Columbia sites is further adjusted with upper level setbacks to provide additional transition to the existing single family uses in the Lowrise zones across 14th Avenue.

2. Physical buffers may provide an effective separation between different uses and intensities of development. The following elements may be considered as buffers:

- a. Natural features such as topographic breaks, lakes, rivers, streams, ravines and shorelines;**

Not applicable. No such features exist here.

- b. Freeways, expressways, other major traffic arterials, and railroad tracks;**

Broadway and 12th Avenues which the City designates as minor arterials, and East Jefferson Street and 14th Avenue which the City designates as collector arterials, serve as effective buffers between the different zoning heights on either side of those arterials.

- c. Distinct change in street layout and block orientation;**

Not applicable.

- d. Open space and greenspaces.**

Logan and Championship Fields on the southern edge of the MIO, along with landscaped setbacks around the campus perimeter, provide separation and transition between different zone intensities in conjunction with setbacks and height restrictions on those most sensitive sites. See Open Space discussion on pages 32 and 33.

3. Zone Boundaries.

- a. In establishing boundaries the following elements shall be considered:**

- (1) Physical buffers as described in subsection E2 above;**

See above, under E2.

- (2) Platted lot lines.**

The proposed MIO expansion area boundaries follow streets and platted lot lines.

- b. Boundaries between commercial and residential areas shall generally be established so that commercial uses face each other across the street on which they are located, and face away from adjacent residential areas. An exception may be made when physical buffers can provide a more effective separation between uses.**

The boundary expansion areas on Broadway north of East Cherry St. and on 12th Avenue north of East Marion Street face across the street from commercial and institutional uses. The other boundary expansion areas, that are located adjacent to residential zones, are principally intended for residential uses by the institution rather than commercial uses.

See also related recommended condition 42 at the end of this report.

- 4. In general, height limits greater than forty (40) feet should be limited to urban villages. Height limits greater than forty (40) feet may be considered outside of urban villages where higher height limits would be consistent with an adopted neighborhood plan, a major institution's adopted master plan, or where the designation would be consistent with the existing built character of the area.**

The Seattle University campus, including all areas of proposed boundary expansion and increased height limits, is entirely located within the Capitol Hill/First Hill Urban Village.

F. Impact Evaluation. The evaluation of a proposed rezone shall consider the possible negative and positive impacts on the area proposed for rezone and its surroundings.

1. Factors to be examined include, but are not limited to, the following:

a. Housing, particularly low-income housing;

There are housing units located in the boundary expansion areas. The University is not proposing in its MIMP to demolish any of this housing. See also related recommended condition 47 at the end of this report.

b. Public services;

An expanded population of students, faculty, staff, and visitors would increase the potential for calls to fire and police, increase water supply and discharge needs, and increase solid waste disposal. The FEIS concluded that these impacts are not likely to be significant.

c. Environmental factors, such as noise, air and water quality, terrestrial and aquatic flora and fauna, glare, odor, shadows, and energy conservation;

DPD prepared a Draft and Final EIS that considered potential impacts of the Seattle University MIMP including the proposed MIO boundary expansions and height increases. The MIO boundary expansions and zoning height increases are not likely to cause significant impacts to these environmental factors. Development pursuant to the proposed taller height limits may have impacts on shadows and energy consumption. If the zoning changes encourage new development, there could be impacts relating to the construction including noise, air and water quality, and traffic, but these construction-related impacts would be temporary. The construction impacts would be analyzed and mitigated, if necessary on a project-specific basis at the time a development is proposed.

During winter months, the new structures located at 1300 and 1313 East Columbia Street would cast morning shadows on some homes to the east of the MIO boundary. Shadow impacts would be limited to afternoon hours during the winter months. Sensitive selection of finish materials and appropriate organization of principal façades should appropriately mitigate against potential glare impacts.

See Light and Glare related SEPA conditions in Section VII.

Considered in its urban context, the Master Plan's proposed growth is likely to cause minimal impacts to local water resources, terrestrial and aquatic flora and fauna. The FEIS identifies no significant odor impacts to the surrounding neighborhood resulting from the proposed expansion.

The FEIS identifies intermittent significant unavoidable adverse noise impacts during periods of certain construction activities (demolition, excavation, and structure erection). These noise impacts are to be expected of construction projects of this scale, and would vary depending residents' proximity to construction activities. Seattle University proposes various mitigations to address construction-related noise impacts. The expansion is not likely to result in long-term noise impacts related to ongoing campus operations.

See Noise related SEPA conditions in Section VII.

d. Pedestrian safety;

The proposed MIMP and Transportation Management Program address pedestrian access and safety. The Final EIS at Section 3.8 discusses pedestrian safety and identifies pedestrian crossings of Cherry Street and Madison Street as areas for future attention. Increased campus population over time could result in increased pedestrian crossings of these arterials which may warrant additional safety measures at the time future development is proposed.

e. Manufacturing activity;

Not applicable

f. Employment activity;

The MIO boundary expansions and increased height limits could result in an increase in academic, housing, recreation, and support uses, including additional employment opportunities. The expansion could support secondary employment opportunities at nearby businesses.

g. Character of areas recognized for architectural or historic value;

The Final EIS discusses in Section 3.7 the potential impacts of MIMP development on properties with potential historic value. It lists the buildings over a certain age that are proposed for redevelopment or demolition as a result of planned or potential projects in the MIMP. Of those listed, several are located in areas of increased zoning height east of 12th Avenue, including the designated landmark located at 1313 East Columbia Street. Based on the City's current procedures, at the time a Master Use Permit application is submitted for a project that would affect any of these buildings, an "Appendix A" analysis would be required of the historic significance of the building. At that time, the City's Historic Preservation Officer can request supplemental information and, if appropriate, can recommend that the structure be reviewed by the City's Landmark Preservation Board for possible designation as a landmark subject to controls.

h. Shoreline view, public access and recreation.

Not applicable. The proposed MIMP and zoning changes would not affect any shoreline.

2. Service Capacities. Development which can reasonably be anticipated based on the proposed development potential shall not exceed the service capacities which can reasonably be anticipated in the area, including:

a. Street access to the area;

The existing street network provides adequate access to the SU campus. The somewhat greater development capacity that would be made possible by the MIO boundary expansions and increased MIO height limits will not impact street access.

b. Street capacity in the area;

The FEIS (Section 3.8) evaluates the potential impact on the street capacity in the vicinity of the campus from the development proposed in the MIMP, including the somewhat greater development capacity that would be made possible by the MIO boundary expansions and increased MIO heights. Based on expected trip generation from the development, the FEIS predicts the level of service at approximately 20 intersections in the vicinity. The Final MIMP includes a Transportation Management Program that is intended to encourage commuting to campus by means other than single occupant vehicles (SOV). The University is currently meeting its SOV goals. As a component of the University's sustainability initiative, it is encouraging the development of additional on-campus housing which will have the effect of reducing commuter trips to campus. Mitigation is described in Section VI – SEPA Analysis, below, and discussed further in the Final EIS.

c. Transit service;

It is not anticipated that the MIO boundary expansions or increased MIO height limits will affect transit service for the campus. The University works with King County Metro for adequate transit service for the campus. It is anticipated that the new streetcar will be in service on Broadway in 2013.

d. Parking capacity;

The FEIS describes in Section 3.8 the existing campus parking supply and predicts the increased parking demand that will occur with the expected growth in students, faculty, and staff over time. On street parking demand is anticipated to remain at the existing levels as all new parking demand will be met by the increased parking supply provided on campus. It is not anticipated that the MIO boundary expansions or increased MIO height limits will have a significant effect on parking supply or demand.

e. Utility and sewer capacity;

The University campus is adequately served with utilities including sewers. The FEIS concludes that it is not anticipated that the MIO boundary expansions or increased MIO height limits will have a significant effect on utility and sewer capacity or demand.

f. Shoreline navigation.

Not applicable.

G. Changed Circumstances. Evidence of changed circumstances shall be taken into consideration in reviewing proposed rezones, but is not required to demonstrate the appropriateness of a proposed rezone. Consideration of changed circumstances shall be limited to elements or conditions included in the criteria for the relevant zone and/or overlay designations in this chapter.

Enrollment at the University, along with the number of faculty and staff, has grown steadily over time. During the 20-year period covered by the proposed MIMP, student enrollment is expected to increase by approximately 36% from 6,764 to 9,200 full time equivalent students, along with accompanying growth in the number of faculty and staff. With the development of planned new residences, it is anticipated that the number of residential undergraduate students will increase from 39% of total undergraduate enrollment to 60%. To support the planned growth and to address significant current deficiencies in space, new facilities are needed.

H. Overlay Districts. If the area is located in an overlay district, the purpose and boundaries of the overlay district shall be considered.

The entire Seattle University campus is included in the Major Institution Overlay (MIO) District. The City is considering the proposed boundary expansions and height increases in accordance with the requirements of the MIO zoning per SMC 23.69. The existing and proposed campus is within the First Hill/Capitol Hill Urban Center; however this is not considered an overlay district per the Land Use Code.

Certain portions of the campus along Broadway, Madison, and 12th are designated as pedestrian areas. Pedestrian-designated areas are not overlay districts. Nevertheless, the proposed boundary expansions and height increases are consistent with the purpose and boundaries of the pedestrian areas, which are intended to promote pedestrian-friendly uses and development.

I. Critical Areas. If the area is located in or adjacent to a critical area (SMC Chapter 25.09), the effect of the rezone on the critical area shall be considered.

Aside from four smaller-sized areas designated as steep slopes, there are no environmentally critical areas on the campus. None of the areas designated as steep slopes are located in a proposed MIO expansion area or in an area proposed for increased MIO zoned height limits. Any development in a steep slope area would be subject to the City's environmentally critical area regulations at SMC 25.09.

V. C. ANALYSIS –MIO CRITERIA

The Land Use Code addresses criteria specific to designation of MIO districts or changes in allowed heights per SMC 23.34.124. This reports states the criteria in **bold**, with analyses below.

- **Public Purpose. The applicant shall submit a statement which documents the reasons the rezone is being requested, including a discussion of the public benefits resulting from the proposed expansion, the way in which the proposed expansion will serve the**

public purpose mission of the major institution, and the extent to which the proposed expansion may affect the livability of the surrounding neighborhood. Review and comment on the statement shall be requested from the appropriate Advisory Committee as well as relevant state and local regulatory and advisory groups.

In the draft MIMP and final MIMP, the University described the areas of MIO boundary expansion and MIO zoned height increases. In the MIMP, the University addresses the reasons for seeking the boundary expansions and height increases, and the University also addresses the other required factors listed above. This discussion is found in the following locations in the MIMP:

- Executive Summary
- Introduction – Background; Plan Purpose & Process; Consistency with City of Seattle Goals
- Mission, Goals & Objectives – Master Plan Goals & Intent; Planning for Sustainability
- Development Program – Boundaries and Property Ownership
- Development Standards – Proposed Building Height Limits; and Boundary and Building Height Limits

The University discussed the enrollment increases that it has experienced in recent years and the projected enrollment increases during the 20-year period covered by the proposed MIMP. The University also addressed the need for additional space to accommodate existing deficiencies and future enrollment growth.

The proposed boundary expansions and height increases were presented to the University's CAC as part of the MIMP presentations and discussions over a three year period. The CAC delivered comments on these proposed changes as part of their comments on the draft MIMP and draft EIS. Public notices of the availability of the draft MIMP and draft EIS were issued and comments from interested agencies and members of the public were received. DPD anticipates further CAC input as outlined in SMC 23.69.032.G.

- **Boundaries Criteria**

1. ***Establishment or modification of boundaries shall take account of the holding capacity of the existing campus and the potential for new development with or without a boundary expansion.***

The University has largely completed the development contemplated in its earlier MIMP. If the University were to forego boundary expansions, ultimately it would need to increase heights even further than proposed. One of the alternatives considered in the EIS is to not increase MIO zoned heights east of 12th Avenue. The analysis in this alternative shows that, without the height increases, the University would need to construct taller buildings on property west of 12th Avenue and propose additional boundary expansions east of 12th Avenue.

2. ***Boundaries for an MIO district shall correspond with the main, contiguous major institution campus. Properties separated by only a street, alley or other public right-of-way shall be considered contiguous.***

All boundary expansions correspond to the main, contiguous Major Institution campus.

3. Boundaries shall provide for contiguous areas which are as compact as possible within the constraints of existing development and property ownership.

The proposed boundary expansions are modest and contiguous. The total area within the existing MIO boundaries is 54.9 acres. The area of proposed boundary expansions is 2.4 acres, an increase of 4.4%. Compared to the projected 205% increase in square footage over the 20-year MIMP planning time period (to address current campus deficiencies, an increase in University enrollment, and an expanded residential population), this proposed boundary expansion is considered compact.

4. Appropriate provisions of this Chapter for the underlying zoning and the surrounding areas shall be considered in the determination of boundaries.

On Broadway, the MIO boundary expansion area south of East James St. is proposed at MIO 90 which is similar to the underlying NC3-85 zoning height it would overlay as well as the NC3-85 zoning on the non-MIO property across Broadway. The proposed height increase on the Broadway property north of East Cherry St. to 160' is consistent with the MIO zoning to the north and the Swedish development across Broadway.

East of 12th Avenue, the proposed increase in MIO height from 50' to 65' is relatively modest and should not change significantly the relationship with the non-SU owned parcels in that area that are subject to the underlying multi-family zoning. An exception to this is the Barclay Court area which maintains a unique low-rise single-family character so, in that instance, the University proposes MIO 37 zoning to maintain consistency with the non-SU owned property in that area.

The proposed MIO zoning in the MIO expansion areas, east of 12th Avenue and north of East Columbia and East Marion Streets is also compatible with the underlying zoning it overlays and the adjacent properties outside the boundaries. The proposed MIO 65 zoned property on 12th Avenue north of East Marion Street would represent an increase over the underlying NC2P-40 zoning, but is suitable along 12th Avenue to encourage sustainable development and pedestrian-friendly commercial-type uses along this street. The proposed MIO 37 zoning on the rest of the MIO expansion area along East Marion Street and 13th Avenue is consistent and protective of development in the underlying and adjacent LR3 zoned area.

The largest contrast in proposed height changes occur along 14th Avenue where the existing MIO zone is 37 and is proposed to go to a 65 foot height limit. This increased height was discussed at length by the CAC and public at multiple meetings and resulted in SU responding with the Revised MIMP – October 2011 and amended in November 2011. This revision is explained on pages 37-38 and includes significant upper level setbacks along 14th Avenue for the two sites in question, as well as along the north edge of the 1300 East Columbia site. Using the height calculation technique of the Land Use Code resulted in slightly larger building massing; therefore height limitations within the 65 foot zone are recommended for each of the two sites in an effort to shift the bulk of the height away from 14th Avenue and the residential community and zone beyond and towards 13th Avenue. See recommended conditions 3 through 9 at the end of this report.

5. Preferred locations for boundaries shall be streets, alleys or other public rights-of-way. Configuration of platted lot lines, size of parcels, block orientation and street layout shall also be considered.

All the proposed MIO boundary expansions follow the preferred locations: streets, alleys, and platted lot lines.

- 6. *Selection of boundaries should emphasize physical features that create natural edges such as topographic changes, shorelines, freeways, arterials, changes in street layout and block orientation, and large public facilities, land areas or open spaces, or green spaces.***

The proposed MIO boundary expansions follow arterials, streets, alleys, and platted lot lines. There are no significant other physical features applicable here.

- 7. *New or expanded boundaries shall not be permitted where they would result in the demolition of structures with residential uses or change of use of those structures to non-residential major institution uses unless comparable replacement is proposed to maintain the housing stock of the city.***

All three boundary expansion areas include structures with residential uses. The University is not proposing any demolitions or changes of use. While the MIMP is silent on future development proposals on these sites, the criterion requires greater assurances that the city's housing stock is maintained as a result of this MIO expansion. Therefore, DPD recommends the following condition.

DPD Recommendation -- These conditions are reiterated in Section VII.

❶ Before Seattle University may receive a permit to demolish a structure that contains a residential use and is located in an MIO boundary expansion area approved in this MIMP, or receive a permit to change the use of such a structure to a non-residential major institution use, DPD must find that the University has submitted an application for a MUP for the construction of comparable housing in replacement of the housing to be demolished or changed.

The MUP application(s) for the replacement housing project(s) may not include projects that were the subject of a MUP application submitted to DPD before Council approval of this MIMP. The University may seek City funds to help finance the replacement housing required by this condition, but may not receive credit in fulfillment of the housing replacement requirement for that portion of the housing replacement cost that is financed by City funds. City funds include housing levy funds, general funds or funds received under any housing bonus provision.

For purposes of this condition 47, the comparable replacement housing must meet the following requirements:

- a) Provide a minimum number of units equal to the number of units to be demolished or changed;
- b) Provide no fewer than the number of 2 and 3 bedroom units as those in the units to be demolished or changed;
- c) Contain no less than the gross square feet of the units to be demolished or changed;
- d) The general quality of construction shall be of equal or greater quality than the units to be demolished or changed; and
- e) The replacement housing will be located within the First Hill/Capitol Hill Urban Center and the area east of that center to Martin Luther King Jr. Way."

8. Expansion of boundaries generally shall not be justified by the need for development of professional office uses.

The University is not proposing to develop any professional office uses in the boundary expansion areas. Seattle University proposes to expand primarily to facilitate development of facilities central to its education mission. Office space is a likely to be accessory to the institution, but Seattle University justifies expansions primarily for purposes other than the development of professional offices unrelated to its mission.

• Height Criteria.

1. Increases to height limits may be considered where it is desirable to limit MIO district boundary by expansion.

The proposed increase in MIO height limits, which is mainly east of 12th Avenue, is desirable to limit MIO boundary expansions. The Final EIS includes in Section 3.5 an analysis of the effect of not increasing heights east of 12th Avenue. It concludes that the lost development capacity from maintaining existing heights would have to be recovered by increasing development heights west of 12th and further expanding MIO boundaries east of 12th.

2. Height limits at the district boundary shall be compatible with those in adjacent areas.

See discussion above. Proposed height limits at the MIO boundary are intended to be compatible with those in adjacent areas. Special setbacks and lowered heights are included on the eastern boundary to maintain compatibility with existing single-family and multi-family in adjacent areas.

3. Transitional height limits shall be provided wherever feasible when the maximum permitted height within the overlay district is significantly higher than permitted in areas adjoining the major institution campus.

See discussion above. Specific upper level setbacks are included on the eastern boundary to maintain compatibility with existing single-family and multi-family uses adjoining the major institution campus.

4. Height limits should generally not be lower than existing development to avoid creating non-conforming structures.

The proposed height limits are not lower than existing development on the subject sites.

5. Obstruction of public scenic or landmark views to, from or across a major institution campus should be avoided where possible.

In Chapter 3.5, the Final EIS addresses the potential impacts of Master Plan development on public scenic or landmark views to, from or across the campus. The Final EIS identifies no substantial impacts to public scenic views including those protected under the City's SEPA policies at Chapter 25.05 SMC. The Final EIS also identifies no substantial impacts to landmark views including views of 1313 E. Columbia St. and other nearby landmarks, particularly in light of the requirement that future development associated with a landmark will require a Certificate of Approval from the City's Landmarks Preservation Board.

- **In addition to the general rezone criteria contained in Section 23.34.008, the comments of the Major Institution Master Plan Advisory Committee for the major institution requesting the rezone shall also be considered.**

The Citizens Advisory Committee (CAC) heard presentations regarding the proposed MIMP including the proposed boundary extensions and MIO height increases. DPD staff and consultants attended CAC meetings during the MIMP process and considered comments and discussion throughout. The CAC discussed various issues that arose in the MIMP and EIS, and the CAC submitted comments to the University and the City. In particular, there was discussion regarding the proposed heights on the eastern boundary. The proposed setbacks and lowered height limits on the eastern boundary were recommended by the CAC following this discussion.

The CAC delivered a letter outlining their comments and recommendations on the Draft MIMP and DEIS to DPD on January 9, 2009 (note that a typo was contained in the date of the letter, showing 2008). A copy of this letter is available in the project file. In October 2011, the CAC review and voted to approve the increased upper level setbacks on the 1300 and 1313 East Columbia sites, which results in decreased bulk and massing and supports a more sensitive transition to the residential neighborhood to the east. As the CAC's discussion is ongoing, this report does not incorporate or respond to the CAC's most recent input.

RECOMMENDATIONS -- REZONE

The Director recommends **CONDITIONAL APPROVAL** of the proposed rezone subject to conditions outlined in Section VII.

VI. ANALYSIS – SEPA

VI. A. INTRODUCTION

Environmental review resulting in a Threshold Determination is required pursuant to the State Environmental Policy Act ("SEPA"), Chapters 43.21C RCW and 197-11 WAC, as well as the Seattle SEPA ordinance at Chapter 25.05 SMC. It was determined that the project had a potential to result in significant adverse impacts to the following areas of the environment:

- Air Quality
- Plants
- Environmental Health and Noise
- Land Use and Relationship to Plans/Policies/Regulations
- Aesthetics
- Light/Glare/Shadows
- Historic Resources
- Transportation, Circulation and Parking
- Construction-Related Impacts
- Housing

Accordingly, a Determination of Significance was published on March 6, 2008 and sent to parties of interest. A scoping meeting pursuant to SMC 25.05.410 was held on March 26, 2008 in conjunction with the scoping process. The Draft Environmental Impact Statement was published on May 7, 2009. Public notice of the availability of this document, along with the Notice of

Public Hearing was published concurrently. In addition, a Notice of Availability of the Draft Major Institution Master Plan was published on May 14, 2009. During the 46-day public comment period on the DEIS, the public and affected agencies submitted a total of 28 comment letters. On June 3, 2009, a public hearing was held on the project, as required under SMC 25.05.502, at which eight people testified. A Final EIS, which includes additional information on the project as well as responses to the comments, was published on June 2, 2011.

An environmental impact statement is used by agency decision makers to analyze environmental impacts, along with other relevant considerations or documents, in making final decisions on a proposal. The SEPA Ordinance contemplates that the general welfare, social, and other requirements and essential considerations of state policy will be taken into account in weighing and balancing project alternatives and in making final decisions. The FEIS and supplemental documents provide a basis upon which the responsible agency and officials can make the balancing judgment mandated by SEPA, because it provides information on the environmental costs and impacts. However, additional environmental review may be required at the time of seeking permits for any planned or potential project disclosed in the MIMP, as well as any of the proposed vacations. Such authority is provided in SMC 25.05.055 and 25.05.600.

The SEPA Overview Policy (SMC 25.05.665) clarifies the relationship between codes, policies and environmental review. Specific policies for each element of the environment, certain neighborhood plans, and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority. The Overview Policy states, in part, “Where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation” subject to some limitations. Under such limitations/circumstances (SMC 25.05.665) mitigation can be considered.

VI. B. SHORT - TERM IMPACTS

Because MIMP adoption does not itself authorize construction, short-term environmental impacts are expected to be slight. Construction impacts will be analyzed and addressed in detail as part of project-level permit review. Nevertheless, the FEIS evaluated potential short-term impacts resulting from construction, including air, noise, environmental health, and traffic, concluding that no significant short-term impacts arising from MIMP adoption are likely. These are discussed below.

Several adopted codes and/or ordinances provide mitigation for some of the identified impacts. The Stormwater, Grading and Drainage Control Code regulates site excavation for foundation purposes and requires that soil erosion control techniques be initiated for the duration of construction. The Street Use Ordinance requires watering streets to suppress dust, on-site washing of truck tires, removal of debris, and regulates obstruction of the pedestrian right-of-way. Puget Sound Air Pollution Control Agency regulations require control of fugitive dust to protect air quality. The Building Code provides for construction measures in general. Finally, the Noise Ordinance regulates the time and amount of construction noise that is permitted in the City. Compliance with these applicable codes and ordinances will reduce or eliminate most short-term impacts to the environment.

The following temporary or construction-related impacts are expected: decreased air quality due to suspended particulates from building activities and hydrocarbon emissions from construction vehicles and equipment; increased dust caused by drying mud tracked onto streets during construction activities; increased traffic and demand for parking from construction equipment and personnel; increased noise; and consumption of renewable and non-renewable resources.

Air Quality

Puget Sound Clean Air Agency (PSCAA) regulations require control of fugitive dust to protect air quality and would require approval for removal of asbestos (if any) during demolition. DPD typically conditions Master Use Permits involving demolition, as there is no permit process to ensure that the applicant would notify PSCAA of the proposed demolition. DPD recommends a condition pursuant to SEPA authority under SMC 25.05.675 A, requiring Seattle University to submit to DPD a copy of the PSCAA Notice of Intent to Demolish before issuance of any demolition permit as disclosed in the Master Plan and evaluated in the Final EIS. This would ensure proper handling and disposal of asbestos, if it is encountered on the site.

Short-term construction impacts including site preparation, demolition and construction would generate carbon monoxide from construction vehicles and equipment. Dust may also contribute to a local deterioration of air quality over typical construction periods of projects. The FEIS discusses construction impacts in Section 3.9.

Short-term construction impacts to air quality include:

- For alternatives that include demolition, there is a potential for lead paint or asbestos to be found due to the age of the buildings which could be released into the atmosphere and/or present a hazard to workers.
- Site preparation, demolition and construction would generate carbon monoxide from construction vehicles and equipment.
- Dust may also contribute to a local deterioration of air quality over typical construction periods of projects.
- Secondary air quality impacts may occur from construction-related traffic having to travel at reduced speeds if traveling during peak traffic periods.

DPD Conditions -- These conditions are reiterated in Section VII.

❶ Construction related air quality impacts may adversely affect the local neighborhood. The extent and duration of the impacts may be substantial. DPD therefore conditions its approval of the Final Master Plan as follows:

The mitigation measures in Section 3.9.1.4 of the Final EIS shall apply and are reiterated in Section VII.

Greenhouse Gas Emissions

Construction activities including construction worker commutes, truck trips, the operation of construction equipment and machinery, and the manufacture of the construction materials themselves result in increases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming. While these impacts are adverse, they are not expected to be significant.

Noise

The MIO and surrounding neighborhoods contain residential, classroom, and business uses. Due to the lengthy construction schedules for both planned and potential projects, control of noise impacts that could possibly affect both adjacent residential and commercial uses in the area

appears warranted. The FEIS describes construction noise impacts in Section 3.3.2. While the City's Noise Ordinance (SMC 25.08) establishes maximum permissible sound levels to which Seattle University must adhere, residential homes adjacent to the MIO boundaries may be adversely impacted by construction related noise. In addition, there are numerous commercial developments in the area that may be adversely impacted by noise generated throughout the construction schedule.

Construction noise would occur with the development of projects during each of the planned construction phases over the proposed 20 year Master Plan period.

- Noise would result from demolition, excavation activities, structure erection and interior work.
- The extent and duration of the construction noise impacts may be substantial. Construction noise for each alternative will impact the surrounding neighborhood differently due to the location and timing of the construction of the proposed buildings.
- While the City's Noise Ordinance (SMC 25.08) establishes maximum permissible sound activities that the project intends to adhere to, major residential developments adjacent to the MIO boundaries may be adversely impacted by construction-related noise.

Mitigating conditions should be considered as necessary during project-level permit review.

DPD Conditions -- These conditions are reiterated in Section VII.

❶ Construction related environmental noise impacts may affect the neighborhood. The extent and duration of the impacts may be substantial; DPD therefore conditions its approval of the Final Master Plan as follows:

The mitigation measures in Section 3.9.2.4 of the Final EIS shall apply and are reiterated in Section VII.

Environmental Health

Although the University has stood at the same location for most of its history, the campus has grown and incorporated adjacent commercial and residential sites. While the majority of campus has no known environmental contamination issues, one on-campus location, 1223 E. Cherry, contains areas of subsurface contamination. That site has been developed under a Cleanup Action Plan enacted in 2008. Care should be taken to identify any previously undocumented environmental contamination at any location slated for development or redevelopment. Additionally, demolition of existing structures could disturb asbestos-containing materials and/or lead-based paints. Pre-demolition surveys and, as necessary, abatement should be completed. Mitigating conditions should be considered as necessary during project-level permit review.

DPD Recommendation -- These conditions are reiterated in Section VII.

❶ Construction related environmental health impacts may affect the neighborhood. The extent and duration of the impacts may be substantial; DPD therefore recommends that Council condition its approval of the Final Master Plan as follows:

The mitigation measures in Section 3.9.3.4 of the Final EIS shall apply and are reiterated in Section VII.

Transportation

Construction of both planned and potential projects will involve extensive excavation and grading. The Municipal Code (SMC 11.74.160) states that material hauled in trucks shall be loaded so no debris falls onto the street or alley during transport. This Code (SMC 11.62.060) also requires truck-trailers or truck semi-trailers used for hauling to use major truck streets and take the most direct route to or from one of the major truck streets to their destination.

The MIO boundaries include both major and minor arterials that have significant traffic associated with their use throughout the 24 hour time period. The activities associated with both planned and potential developments include the extensive demolitions and excavations at each site. These significant construction activities may generate adverse impacts, therefore pursuant to SMC 25.05.675 B (Construction Impacts Policy) and SMC 25.05.675 R (Traffic and Transportation) additional mitigation may be warranted.

The University should coordinate with SDOT to minimize impacts caused by construction vehicle traffic. A construction traffic plan for truck deliveries/routes and construction workers would be prepared to minimize disruption to traffic flow on adjacent streets and roadways. This plan would consider the need for special signage, flaggers, route definitions, flow of vehicles and pedestrians during construction and street cleaning. The plan shall be reviewed and approved prior to any application for a Master Use Permit for future construction of any planned or potential project and will be required to be amended for each project during their respective SEPA review when site specific impacts are disclosed and conditioned under SMC 25.05.660. Mitigating conditions should be considered as necessary during project-level permit review.

DPD Recommendation -- These conditions are reiterated in Section VII.

❶ Construction related traffic impacts may affect the neighborhood. The extent and duration of the impacts may be substantial; DPD therefore conditions its approval of the Final Master Plan as follows:

The mitigation measures in Section 3.9-12 of the Final EIS shall apply and are reiterated in Section VII.

VI. C. LONG-TERM/CUMULATIVE IMPACTS

Long-term or use-related impacts are also anticipated as a result of approval of this proposal including: increased surface water runoff due to greater site coverage by impervious surfaces; increased bulk and scale on the site; increased traffic in the area and increased demand for parking; increased demand for public services and utilities; and increased light and glare.

Several adopted City codes and/or ordinances provide mitigation for some of the identified impacts. Specifically these are: the Stormwater Code (Chapters 22.800-22.808 SMC), Grading Code (Chapter 22.170 SMC), the City Energy Code (Chapter 22.700 SMC, requiring energy-efficient windows and insulation for outside walls), and the Land Use Code (Title 23 SMC (specifying development standards including site coverage, setbacks, and building height as well as other development and use regulations). Compliance with these codes and ordinances where applicable is adequate to achieve sufficient mitigation of most long-term impacts that are not considered significant.

The FEIS examines potential impacts of ten elements of the environment, including:

- Air quality and global climate change
- Plants
- Environmental health and noise
- Land Use and Relationship to Plans/Policies/Regulations
- Aesthetics
- Light/Glare/Shadows
- Historic Resources
- Transportation, Circulation, and Parking
- Construction-Related Impacts
- Housing

Each is addressed below. The FEIS concluded that adoption of the MIMP would produce no significant impacts to any of these elements of the environment. However, as discussed below, the FEIS did propose limited mitigation for some.

Air Quality and Global Climate Change

The FEIS (Section 3.1) anticipates that particulate and carbon monoxide emissions resulting from adoption of the MIMP, particularly from the construction of a major new parking facility at Logan Field, will not exceed those of nearby intersections. Other, smaller new facilities will produce still lower emissions.

The FEIS acknowledges that MIMP adoption may result in increased greenhouse gas emissions, but because the causes and the effects of climate change are global in scale, the incremental contribution of any single project, even one as large as the development program described in the MIMP, cannot be measured or mitigated. No significant adverse impacts are anticipated.

Plants

The FEIS (Section 3.2) identifies existing major trees on campus and evaluated the impacts to these trees from the Proposed Action and alternatives. The development program described in the MIMP may displace certain individual plants or gardens which would be replaced in accordance with the requirements of the Tree Protection Ordinance at Chapter 25.11 SMC. No significant impacts are anticipated, however trees may be affected and mitigation is necessary.

DPD Conditions -- These conditions are reiterated in Section VII.

❶ Construction related impacts to trees may be substantial; therefore DPD conditions its approval of the Final Master Plan as follows:

The mitigation measures in Section 3.2.4 of the Final EIS shall apply and are reiterated in Section VII.

Environmental Health

The FEIS (Section 3.3) evaluate the impacts to human health from proposed redevelopment of campus under various alternatives. The majority of the University campus has no known environmental contamination. Two on-campus sites—1313 E Columbia and 1223 E Cherry—

have been evaluated for potential contamination due to historical uses prior to acquisition by the University. The 1313 site contained no contaminants that exceeded Model Toxics Control Act (MTCA) cleanup levels. Groundwater mercury levels were 1/10 the MTCA cleanup level of two parts per billion, while the groundwater and soil tested negative for all other contaminants.

The 1223 E Cherry site, however, was once contaminated beyond MTCA cleanup levels. A Cleanup Action Plan (“CAP”) was prepared for the site on June 2, 2008. The University has completed construction at this site in accordance with the CAP. The University should continue to abide by the CAP and should follow the suggested mitigation measures in the FEIS. At the time of this report, the site located at 1223 East Cherry has already been re-developed under the previous MIMP; therefore no mitigation is necessary on this site.

DPD Conditions -- These conditions are reiterated in Section VII.

❶ Environmental health impacts from future development may be substantial; therefore DPD conditions its approval of the Final Master Plan as follows:

The mitigation measures in Section 3.3.1.4 of the Final EIS shall apply and are reiterated in Section VII under During Construction for Future Development – Environmental Health.

Noise

The FEIS (Section 3.3.2) evaluates the long-term noise impacts of the proposed alternatives. The campus currently experiences background noise levels typical of an urban setting. The adoption of the MIMP is not anticipated to produce significant noise impacts. The FEIS establishes that project-related traffic would not increase noise levels to a discernable level. The vents at the proposed Logan parking garage will be designed to comply with the City of Seattle Noise Ordinance. Mechanical equipment for HVAC and elevators on planned and potential projects will also generate noise, but because of the conceptual nature of the MIMP, no project-specific details are available at this time. Any new HVAC will comply with the Noise Ordinance. Even a doubling of spectator attendance at new athletic facilities will create an increase noise levels by only 3 dBA, a level which is unlikely to be discernable. Finally, new student housing will not produce significant impacts provided the University continues to manage its students appropriately.

DPD Conditions -- These conditions are reiterated in Section VII.

❶ Noise impacts from future development from mechanical equipment at the Logan Field parking facility may be substantial; therefore DPD conditions its approval of the Final Master Plan as follows:

The mitigation measures in Section 3.3.2.4 of the Final EIS shall apply and are reiterated in Section VII.

Land Use

Land use impacts are discussed on pages 3.4-1 – 3.4-24 of the FEIS. Land use changes under the MIMP would occur incrementally over time—full implementation of the MIMP will involve new construction and additions/renovation to 34 facilities over approximately a 20-year time period. The land use pattern in the MIO would not be greatly altered by the planned or potential projects,

but institutional uses would continue to expand within the MIO boundaries. This expansion will produce indirect impacts such as demand for supporting uses (i.e., restaurant and retail) to serve the University's employees and students.

The MIO boundary expansion in the southwestern corner of campus proposed in the MIMP seeks to "square off" the MIO boundaries. The new MIO area will include increased institutional height allowances, but this will bring the properties more in-line with the higher hospital heights across Broadway. The expansion at the northeast corner of 12th and E Marion brings within the MIO all four corners of the intersection that forms the main entrance to the campus. Within the MIO, the proposed new structures and accessory garages would not change the existing uses but would intensify them.

While no MIO boundary expansion is proposed for the eastern edge of campus along 14th Avenue, the MIMP would increase height limits from MIO 37 to MIO 65 with a height limitations on the sites located at 1300 and 1313 East Columbia. The underlying Lowrise 3 zone has a maximum height limit of 45-47 feet (including bonuses for pitched and green roofs). The underlying Lowrise 1 zone carries a 35-37 foot height limit (including bonuses for pitched and green roofs). The University indicates that this increased height is necessary to meet its space needs and to provide modern academic facilities requiring greater floor-to-floor heights. The impacts from this increased height are mitigated through (a) site geography (west side of 14th is lower in elevation than the east side); (b) a 15-foot ground-level setback; and (c) a 60 and 80-foot upper-level setback.

The MIO District would continue to recognize University functions under the new MIMP. The institutional development standards proposed would apply which would allow more intensive development. However, in the long-term, beyond projects currently proposed, there may be land use impacts due to the replacement of the underlying zoning development standards by the institutional standards, however it is not anticipated that these impacts will be significant.

Land Use – Relationship to Plans/Policies/Regulations

The FEIS addressed the relationship of the MIMP to several adopted land use plans, policies, and regulations at pp. 3.4-25 – 3.4-50, including:

- City of Seattle Comprehensive Plan;
- Central Area Neighborhood Plan (Including the 12th Avenue Urban Center Village);
- First Hill Neighborhood Plan;
- Pike/Pine Neighborhood Plan;
- Capitol Hill Neighborhood Plan;
- 12th Avenue Development Plan;
- Swedish Medical Center/First Hill Campus Major Institution Master Plan;
- Swedish Medical Center/Cherry Hill Campus Major Institution Master Plan;
- City of Seattle Land Use Code; and,
- City of Seattle Alley Vacations Criteria.

The discussion in the FEIS establishes that the MIMP is generally consistent with the planning goals of the various plans, policies, and regulations.

No further conditioning under SEPA for these impacts is warranted in excess of those proposed under the MIMP and re-zone analyses, Section IV and V earlier in this report.

Aesthetics

Aesthetics, including bulk and scale impacts, are discussed on pages 3.5-1 – 3.5-20 of the FEIS. To illustrate the potential impacts, the FEIS includes architectural renderings and section drawings showing potential building envelopes. DPD generally considers mitigation of bulk and scale impacts under SMC 25.06.675.G when the proposed development is significantly larger than zoned heights in adjacent zones. This report also discusses height transitions in its discussion of the expanded MIO (page 34-38). The MIO-65 zone proposed along the eastern edge of campus, along 14th Avenue are both subject to height limitations described in Section IV. The height of these structures directly across from the residential zones across 14th Avenue would be limited to 37 feet and then setback either 60 or 80 feet before extending up to the allowed height. Therefore, the height differences are not “significantly larger” than the height limits in adjacent zones, due to the height limitations and significant setbacks proposed sufficiently mitigate impacts.

Generally, bulk and scale impacts that could result from development of both planned and potential impacts are mitigated through the proposed development standards in the MIMP. Development sites within the MIMP are generally comparable to those within other sites in the MIO. Disparities in bulk and scale between sites on the MIO boundary and those found in zones across from the MIO, in particular residentially zoned sites, are generally mitigated through application of development standards and design guidelines in the MIMP as well as the underlying zoning, the platting pattern, and widths of rights of way on MIO boundaries.

DPD recommends conditions related to mitigation of height, bulk, and scale impacts as addressed in the analysis and conditions of the proposed MIO, as outlined in Section IV, and in the analysis and conditions of the proposed rezone, as outlined in Section V. DPD recommends that Council condition its approval of the Final Master Plan, as outlined in Section VII below.

Light/Glare/Shadows

The FEIS addresses light and glare at pp. 3.6-1 – 3.6-3. The University has fixed sources of light, including buildings with interior and exterior lighting, reflective surfaces such as windows, and lighted tennis courts, as well as mobile sources such as vehicles entering, exiting, and circulating within the campus. The University's light and glare sources are generally typical of the surrounding urban environment. The light and glare impacts of MIMP approval are not expected to be significant, however mitigation is necessary to avoid substantial impacts.

The FEIS includes a complete shadow analysis at pp. 3.6-4 – 3.6-25. The analysis depends on preliminary estimates of building footprints and heights, each of which will likely change as project-level planning proceeds in the next 20 years. The analysis shows that some shadow impacts would result from development in accordance with the MIMP. Shadow impacts, however, are only protected by SEPA policies for publicly owned parks, public schoolyards and private schools which allow public use of schoolyards during non-school hours and publicly owned street ends in shoreline areas. Therefore, shadows generated from the proposed structures onto private yards are not subject to SEPA mitigation.

DPD Conditions -- These conditions are reiterated in Section VII.

❶ Future development would affect light and glare impacts; therefore DPD conditions its approval of the Final Master Plan as follows:

The mitigation measures in Section 3.6.4 of the Final EIS shall apply and are reiterated in Section VII.

Historic Resources

The FEIS analyzes the historic resources on the Seattle University campus in Section 3.7. The University was founded 120 years ago and relocated to its current campus in 1893. Although the campus contains many old buildings, only one is a designated City Landmark: the former Coca-Cola bottling plant at 1313 E Columbia. The FEIS contains a list of buildings older than 40 years at p. 3.7-4. Two of these buildings are proposed to be removed in the near term and three in the long-term. In accordance with City procedure, an historic analysis will be conducted for any project subject to SEPA that proposes the demolition of an older structure. This analysis would be required at the time of submittal of the Master Use Permit. A structure that could be eligible for Landmark status under City ordinance is referred to the Landmark Board for consideration. Thus, analysis of whether any of these five buildings qualify for preservation will be conducted at the time of project permitting.

MIMP adoption is not expected to have any significant effect on the 1313 E Columbia building or any other designated landmark buildings in the vicinity of campus.

Transportation, Circulation, and Parking

An integral part of the evaluation of the environmental impacts of this project included an assessment of the traffic and transportation impacts of the project (Section 3.8 of FEIS).

Transportation: The preferred alternative analyzed in the Draft and Final EIS includes an analysis of the PM peak hour level of service at intersections within the vicinity of the project. The analysis compares the anticipated impacts of the Proposed Action and the No Action alternative in 2028. The alternatives analyzed in the Draft and Final EIS include an analysis of PM peak hour level of service at 20 intersections within the vicinity of the project. The Proposed Action (in the year 2028), as documented in the Final EIS (page 3.8-29), shows that all signalized intersections are forecasted to operate at LOS-D or better during the PM peak hour. The LOS is also expected to remain at the same level at signalized intersections or improve with the exception of 12th Ave & Madison and 12th Ave & Cherry. At these intersections delays would increase by 1 second and 4 seconds, respectively. All un-signalized intersection averages and approaches are forecasted to operate at LOS-D or better during the PM peak hour with only minor increases in vehicle delay with the exception of the northbound approach at 13th Avenue & Cherry which falls from LOS-C to LOS-E. This decrease in LOS is a result of increased volumes at the two signalized intersections to the east and west, 12th Avenue & Cherry and 14th Avenue & Cherry. Implementation of an enhanced TMP would reduce but not eliminate these impacts. No significant degradation of performance is expected at any of the intersections studied.

Site access: With the Preferred Alternative, all access points to the Seattle University campus would remain unchanged.

Parking: Potential and planned parking projects will continue to meet current Code requirements for the life of the plan. At full build-out of all planned and potential projects, the campus will contain 1,868 off-street parking stalls (FEIS, page 3.8-31). Assuming no change in travel modes, the FEIS concludes that by 2028, the University's commuters—students, employees, and staff—will require 1,734 spaces of on-campus parking. Thus, adoption of the MIMP is not anticipated to produce significant impacts to parking. Should commuter behavior change as anticipated by 2028, that is, should the percentage of SOV commuters decrease in favor of increased transit ridership, the parking supply will be adequate to serve the commuter population.

The MIMP proposes increasing the number of off-street parking spaces and consolidating them on facilities throughout the campus. Analysis for individual development proposals that include parking facilities will be provided as part of the Master Use Permit review which will identify how garage ingress/egress will be managed during large university events such as graduation, games, etc.

Non-motorized travel: SMC 23.54.016.B.4 specifies that a major institution must provide bicycle parking spaces equal to 10% of the maximum number of students and 5% of the maximum numbers of faculty present at the peak hour. However, under this section, DPD may reduce the required bicycle parking upon a showing that the standards are inappropriate for a given institution. The campus currently has parking for 310 bicycles, fewer than the 539 required under the Code calculations. Over the life of the MIMP, the supply will increase to 375 and then to 425. However, the Code requirement will also increase to 624 and then to 711. (See MIMP page 166; FEIS page 3.8-31). Studies of commuter behavior at the University show that only 2% of commuter students and 1% of faculty actually commute by bike. Assuming those numbers do not change, the commuting population will produce a demand of only 155 spaces. Therefore, the proposed supply of 425 stalls is adequate for the needs of the campus. Nevertheless, the University should continue to review bicycle parking demand on a regular bases to ensure that location and supply remain adequate.

The FEIS addresses pedestrian circulation at 3.8-36. Among the concerns is the effect of the construction of the Logan Field parking garage, which will shift a significant portion of the parking supply to the south side of E Cherry and increase the volume of pedestrian traffic crossing Cherry. This can be addressed with a mid-block at-grade crossing on Cherry to the west of 12th. These issues should be examined closely at the time of project permitting.

DPD Conditions -- These conditions are reiterated in Section VII.

❶ Traffic and parking impacts would affect the neighborhood and local corridors. The extent and duration of the impacts may be substantial. DPD therefore conditions its approval of the Final Master as follows:

The mitigation measures in Section 3.8.4 of the Final EIS shall apply and are reiterated in Section VII below.

Housing

The MIMP anticipates a large expansion of on-campus housing. At full build-out, the MIMP development plan would house 4,584 students, or 36% of the total, on campus. This would require up to 1,239,000 square feet of new or renovated campus housing, providing 1,923 to 2,806 new student beds in addition to the 1,778 existing beds. This development plan would not result in significant impacts to the environment.

RECOMMENDATIONS – SEPA

The Director recommends approval of the proposed Final Master Plan, subject to the conditions outlined in Section VII.

VII. SUMMARY AND RECOMMENDATIONS

The above report addresses criteria pursuant to Land Use Code Chapter 23.69 (Major Institution Overlay District), Chapter 23.34 (rezones), and Chapter 25.05 (SEPA). DPD recommends that conditional approval of the proposed Final Master Plan is warranted. This report identifies impact mitigations below.

DPD expects that planned projects will require additional SEPA reviews, when DPD may impose further conditioning. In short, development pursuant to the proposed Final Master Plan, as conditioned below, would be consistent with the framework policy of the City's Major Institutions Policies and represent a reasonable balance of the public benefits of development and change with the need to maintain livability and vitality of the adjacent neighborhoods.

All page numbers used in the following recommendations refer to the Final Master Plan – June 2011 document. In certain instances, page numbers or figures from the Director's Report are also referenced and are specified as contained within this document. These page numbers are provided for the purpose of tracking future revisions across these two documents, as well as to include cross-references within the final Master Plan itself. It is expected that these page numbers may differ from those noted below as a result of formatting revisions to the Master Plan.

VII. A. RECOMMENDED CONDITIONS – MAJOR INSTITUTION MASTER PLAN

The Director recommends approval of the proposed Major Institution Master Plan, subject to the following conditions. The recommended conditions in this section are divided into three parts:

- A) Recommended conditions to amend the Final MIMP to address those conditions that are substantive in nature.
- B) Recommended clarifying amendments to the Final MIMP to address those minor edits to the Final MIMP for clarification purposes.
- C) Recommended conditions to attach at the end of the Final MIMP document as Conditions of Approval to address those conditions which are procedural in nature.

Part A: Recommended Conditions to Amend the Final MIMP

1. Page 51, add the following text at the end of the page as follows:

“Prior to any decision by Seattle University to move forward with a Master Use Permit application for an event center, the following studies, reviews and steps shall be required:

- 1) A full parking and traffic analysis, a site specific light and glare study and a noise analysis shall be completed for review by the Standing Advisory Committee;
 - 2) An evaluation of alternative campus locations shall be completed for review by the Standing Advisory Committee; and
 - 3) The proposed project shall be presented to the community at a widely advertised meeting at the conceptual design phase.
 - 4) As part of any Master Use Permit or SEPA review, the Standing Advisory Committee shall be given the opportunity to review and comment on the project during the schematic and design development phases.”
2. Develop a bicycle access plan for the proposed campus, including existing neighborhood bicycle facilities, bicycle parking locations, parking quality (covered, publicly accessible), number of stalls at each location, and bicyclists’ wayfinding.
 - a) On page 62, add text at end of page describing plan.

Include new graphic showing the following:

- b) Bicycle access throughout campus; and
 - c) Locations of bicycle parking (including covered and/or secured bicycle parking) throughout campus, noting bicycle parking available to visitors at key locations.
3. Update the graphics shown on pages 106 and 107 to show the 1313 East Columbia site with the height limit of 345.14 feet in elevation described on page 37 of this report and illustrated in Figures 9 and 10. The graphic call-out notes shall also be updated accordingly.
 4. Per the Final MIMP – October 2011, update the graphics shown on pages 106 and 107 to show MIO 65’ at 1300 East Columbia site with the height limit of 346.3 feet in elevation described in this report on page 38 and illustrated in Figure 11 and 12. The graphic call-out notes shall also be updated accordingly.
 5. On page 108, the following sentence shall be added for the 1300 and 1313 East Columbia sites.

“Given the sensitive boundary edge and transitional nature of these two sites, any development that proposes to exceed the height limit established for the 1313 East Columbia site (Project #101, page 45) or 1300 East Columbia site shall require a major amendment in accordance with SMC 23.69.035.”

6. On page 108, for the 1300 East Columbia site, add Figures 11 and 12 of this report, along with the following text:

“The height measurement on all portions of the site for the upper levels (above 37') would be taken from an average grade plane of 290.23 feet, resulting in a maximum height of 355.23 feet. This is 8.93 feet taller than the CAC approved height in October 2011, so the height limit for this site would be limited to 346.3 feet in elevation.”

7. On page 108, for the 1313 East Columbia site, add Figures 9 and 10 of this report, along with the following text:

“The 65 foot height limit shall be set from the average grade plane of 280.54 feet, resulting in a maximum height of 345.54 feet. This is 0.4 feet taller than the CAC approved height in October 2011, so the height limit for this site is 345.14 feet in elevation.

8. On page 111, the graphic shall be amended to reflect the upper level setback of 80' for the 1313 E Columbia site and 60' for the 1300 E Columbia site per the Final MIMP – October 2011 and reflected in Figures 8 through 12.

9. On page 115, Sections C and D shall be amended to reflect the updated upper level setbacks and height per the Final MIMP – October 2011.

10. The indented sentence under Landscape Screening on page 121, shall be amended as follows:

“Screening shall be provided wherever parking lots or parking structures abut a public right-of-way or are located along a MIO boundary. For all structures, located along a MIO boundary that is not a public right-of-way and where the underlying zoning is residential, landscape screening shall be provided.”

11. The following paragraphs shall be added to Future Open Space (page 125) as follows:

“Neither the short or long term development plans propose future development on the 1300 East Columbia site (not currently under university ownership). Given the sensitive edge condition of this site, high-quality, welcoming open space shall be provided prior to or simultaneously with development at 1300 East Columbia Street consistent with the requirements of this condition. This open space shall be publicly accessible and urban in character, providing relief both visually and in the activities offered. Elements of these spaces shall include, but are not limited to, landscaping, hardscaping, seating, artwork, trash receptacles and irrigation. The Admissions and Alumni courtyard just east of 12th and Marion provides an example of such high-quality open space.

In the event that a development footprint equal to or greater than 45,000 square feet on the 1300 E. Columbia Street site is proposed, Seattle University shall submit a plan for review by the CAC that shows Seattle University's actual open space plan for this site. Prior to issuance of a Master Use Permit at the 1300 East Columbia site, the University shall present the open space plan to the Standing Advisory Committee for review and comment, and obtain DPD approval of the plan. Provision of this open space shall be a requirement of development approval of the plan.”

12. The following paragraphs shall be added to Future Open Space (page 125) as follows:

“Given the sensitive edge condition of the site located at 1313 East Columbia (#312), high-quality, welcoming open space shall be provided prior to or simultaneously with development at this site consistent with the requirements of this condition. This open space shall be publicly accessible and urban in character, providing relief both visually and in the activities offered. Elements of these spaces shall include, but are not limited to, landscaping, hardscaping, seating, artwork, trash receptacles and irrigation. The Admissions and Alumni courtyard just east of 12th and Marion provides an example of such high-quality open space.

In the event that a development footprint equal to or greater than 75,000 square feet on the 1313 E. Columbia Street site is proposed, Seattle University shall submit a plan for review by the CAC that shows Seattle University's actual open space plan for this site. Prior to issuance of a Master Use Permit at the 1313 East Columbia site, the University shall present the open space plan to the Standing Advisory Committee for review and comment, and obtain DPD approval of the plan. Provision of this open space shall be a requirement of development approval of the plan.”

13. The legend and graphic on page 125 shall be amended to include the following information:

Asterisk within Circle in New Color X for 1300 East Columbia – Planned Open Space Publically Accessible (If Acquired)

Asterisk within Circle in New Color Y for 1313 East Columbia – Planned Open Space Publically Accessible (SU Owned Land)

14. On page 132, add the following to the first paragraph:

“That in the design of any Seattle University building, facing either 12th Avenue, Madison or Broadway, Seattle University designers should strive to provide major entries, possible entry plaza, other fenestration, and street activating uses and features in order to avoid any building appearing to “turn its back” to the street front. Design of buildings should not treat the street fronts as back yards.”

15. On page 133, design guideline #2 shall be deleted.

16. On page 133, design guideline #4 (now #3) shall be amended as follows:

“Avoid literal interpretations of historically designated buildings when designing new buildings.”

17. On page 133, design guideline #6 (now #5) shall be amended as follows:

“Develop detailing that conveys a building's function, contemporary use of technology, and the nature of materials, structure, and systems used. Details should also address scale related to the pedestrian.”

18. On page 133, design guideline #7 (now #6) shall be amended as follows:
“New architecture should respond to the University’s expressed values and standards of excellence in design and material character.”
19. On page 133, new design guideline #11 shall be added as follows:
“New designs should demonstrate sensitivity to the grain and scale of the existing surrounding development.”
20. On page 133, new design guideline #12 shall be added as follows:
“Seattle University plans should include special provisions to activate the streetscape along 12th Avenue, Madison and Broadway through transparency, visible activity, small pedestrian plazas, defined entries at grade level height and should include recognition that 12th Avenue and Broadway in particular have a different character than the other streets in the neighborhood.”
21. On page 133, design guideline #15 (now #16) shall be amended as follows:
“Circulation of all modes of access to a building (including services) must not deteriorate the surrounding campus or neighborhood.”
22. On page 136, streetscape improvement guideline #2 shall be amended as follows:
“The selection of street furnishings will contribute to the street character; these may include lighting, benches, garbage and recycling receptacles, bicycle racks or other bicycle parking, and information kiosks.”

Part B: Recommended clarifying amendments to the Final MIMP

23. Delete pages vii-ix.
24. Page 50, first paragraph, 6th sentence shall be amended as follows:
“By utilizing this site to its proposed capacity with a 65’ height limit (as measured per Figures 9, 10 and 11 and described in the associated text on page 37), the university can achieve its growth objectives without requiring a substantial enlargement of the MIO boundary or pushing other projects elsewhere to heights over 100 feet.”
25. Page 50, second paragraph shall be amended as follows:
“The 1313 E Columbia building has been designated as a City of Seattle landmark. Any future development must comply with SMC 25.12 and Ordinance No. 123294. Therefore, how much of the existing building (if any) could be demolished or incorporated into a new development is unknown at this time and will not be known until the university proposes new development. More information on the university’s commitment to historic preservation can be found in the Historic Preservation section of the Development Standards chapter. The following pages contain descriptions of the three most likely uses for the site. Illustrative sketches showing conceptual massing for these projects can be found in the Development Standards chapter (pages 82-86)”

26. Page 53, the paragraph preceding items 6 and 7 shall be amended as follows:
“Portions or all of the following existing buildings may be demolished and other portions preserved as City of Seattle landmarks, as part of potential long-term development.”
27. Page 59, second paragraph shall be amended as follows:
“Pedestrian access to the existing campus occurs primarily in 13 locations.”
28. Page 74, second to last sentence shall be amended as follows:
“At the time of improvements further narrowing may be possible with reduced lane dimensions and/or increased off-street parking, local transit improvements that warrant additional parking lane reductions, or bike lanes.”
29. Page 99, first paragraph shall be amended as follows:
“The development standards component in this adopted master plan shall become the applicable regulations for physical development of Major Institution uses within the MIO District. These development standards shall supersede the development standards of the underlying zone. Where standards established in the underlying zone have not been modified by the master plan, the underlying zone standards shall continue to apply. This section describes the development standards that will apply to Seattle University for the duration of this MIMP. As this master plan represents a 20-year time horizon for the physical development of campus, many of the details are conceptual at this point. For this master plan to be successful, it is necessary to balance the rigor of specific requirements with the flexibility to address future needs as new conditions arise.”
30. Page 99, last sentence shall be amended as follows:
“(See Pedestrian Designated Streets addressed on pages 103 and 116)”
31. Page 101, page title shall be amended as follows:
“Existing Underlying Zoning & MIO Overlay”
32. Page 103, the two bullet points shall be amended as follows:
“• Street Level Development Standards and Uses (in this chapter, page 116)
• Campus Edge Improvements and Creating a Vibrant 12th Avenue (both in the Campus and Community Context chapter, page 140-145)”
33. Page 105, page title shall be amended as follows:
“Proposed MIO Boundary Expansion & Underlying Zoning”
34. Page 107, the third paragraph shall be amended as follows:
“Height limits shall be according to the plan on this page, consistent with SMC 23.69.004. All height measurements shall follow the measurements technique prescribed in the Land Use Code, with the exception of the following two sites:

- 12th and Madison
- Academic and Housing on E Madison

The measurement techniques for these two sites are explained on page 108.”

35. Page 107, the bullet point shall be amended as follows:

“Rooftop coverage and height limits shall apply per 23.47A.012, however in order to support sustainable energy options, no rooftop coverage limits shall apply to solar, wind energy or other sustainable technologies located on the roof.”

36. Page 108, the following three titles shall be added to the three corresponding sections:

- 12th and Madison (Project #106, page 45) and Academic and Housing on E Madison (Project #307, page 49)
- 1313 E Columbia site (Project #101, page 45)
- 1300 E Columbia site

37. Page 117, the following sentence shall be added to the first paragraph:

“The lot coverage shall be calculated on a campus-wide basis.”

38. Page 125, the following sentence shall be added to the third paragraph:

“The graphic markers indicate areas where open space(s) may be integrated into future development. The open space(s) may include all or a portion of the marked parcels.”

39. Page 126, shall be amended as follows:

“Existing and Future City of Seattle Landmarks

Founded in 1891, Seattle University has been a part of the local community for more than a century. The university takes pride in the historical character of its own buildings on campus and recognizes the value of other potentially historic sites within the community. Seattle University currently has one building that is designated as a City of Seattle landmark, 1313 E Columbia Street (also known as the Coca-Cola Building, Qwest Building, and 711 14th Avenue E). Per SMC 25.12.160, a “Landmark” is an improvement, site, or object that the Landmarks Preservation Board has approved for designation pursuant to this chapter, or that was designated pursuant to Ordinance 102229.1. The historic Coca Cola Bottling Plant (Qwest Building) is a designated City of Seattle with a designating ordinance (Ordinance No. 123294) that describes the features of the landmark to be preserved and outlines the Certificate of Approval process for changes to those features. Built in 1939, previous names of this building are:

Coca-Cola Bottling Plant (1939 - ca. 1970)

Pacific Northwest Bell Telephone Company (1974 - 1990)

Qwest Communications Maintenance Facility (1991 - 2007)

Landmark status does not preclude all changes to a property. If a building is designated as a City of Seattle landmark, changes to the designated features of the building will be reviewed by the Landmarks Preservation Board as a part of the Certificate of Approval process. The Landmarks Preservation Board reviews Certificates of Approval to ensure

that change is managed in a way that respects the historical significance of the designated landmark. Some members of the CAC have expressed interest in the Lynn Building along E Madison Street. When the university moves forward with a Master Use Permit (MUP) application for development that would include the demolition or substantial alteration to a building 50 years or older and/or public comment suggests that the building is historic, a referral will be made to the City's Historic Preservation Officer, pursuant to the City's SEPA policies as established in SMC 25.05.675H or the university may submit a landmark nomination application to the Landmarks Preservation Board in advance of the MUP process. It is the university's intention to continue to comply with the City's Landmarks Preservation Ordinance, SMC 25.12, to respect the character of historic structures as a complement to new development. No other existing buildings are currently designated landmarks."

Part C. Recommended conditions to add at conclusion of the Final MIMP

40. Seattle University shall create and maintain a Standing Advisory Committee to review and comment on all proposed and potential projects prior to submission of their respective Master Use Permit applications. Any proposal for a new structure greater than 4,000 square feet or addition greater than 4,000 square feet to an existing structure shall be subject to formal review and comment by the Standing Advisory Committee (SAC). The Standing Advisory Committee (SAC) will use the Design Guidelines for evaluation of all planned and potential projects outlined in the Master Plan.
41. DPD and SDOT recommend that, when a MIMP project is proposed and is subject to SEPA review, the scope of SEPA analysis include an evaluation of potential impacts on nearby transit facilities.
42. Concept Streetscape Design Plans for Broadway and Madison. Within three years of MIMP approval, the University will prepare and submit to DPD and SDOT for their approval conceptual streetscape design plans for (1) the east side of Broadway between Madison Street and Jefferson Street and (2) the south side of Madison between Broadway and 12th Avenue, similar to the conceptual plan for 12th Avenue depicted at pages 142-143 of the MIMP. The University will work with the City and other property owners to identify public and private funding sources to implement the concept plans over time.

The plans shall be prepared consistent with the provisions of the Seattle Right-of-Way Improvements Manual. Elements of the plan must include, but are not limited to: street-level setbacks/land uses and pedestrian environment, private/public realm interface, pedestrian level lighting, way-finding, streetscape furniture, landscaping and tree selection. The plans shall also address all Pedestrian Master Plan priority improvement locations and facilities identified in the Bicycle Master Plan. Where there are bike lanes and right turn only lanes at the same corner, evaluate the feasibility of National Association of City Transportation Officials-standard bicycle facilities.

Once completed, these plans shall be considered during review of any applications for permits to improve any development site adjacent to Broadway or Madison.

VII. B. RECOMMENDED CONDITIONS – REZONE

As part of the requested rezone, DPD recommends several mitigations for impacts related to institutional growth and zoning transitions.

43. The last paragraph on page 116 shall be amended as follows:

“The underlying street-level development standards for commercial zones shall apply per SMC 23.47A.008 to all street facing facades in commercial zones within the MIO that are not designated as pedestrian streets. For pedestrian designated streets, the underlying street-level development standards for pedestrian designated streets in commercial zones shall apply per SMC 23.47A.008.C. For all street facing facades, the street-level designs shall also be shaped by the design guidelines outlined in the Campus and Community Context chapter.”

44. On page 140, the street activating university uses list shall be amended as follows:

“- campus bookstore
- child care facility
- coffee shop
- food service
- fitness center
- copy center
- theater / performing arts
- financial / banking centers
- community meeting spaces”
- campus /community service centers*

*Service Center uses include but are not limited to activities such as community outreach; employment and employee services; public safety services including transit and parking pass distribution, lost and found, keys, and dispatch; student services; and counseling services.”

45. On page 140, the last paragraph shall be amended as follows:

“For the site located at the northeast corner of 12th Avenue and East Marion Street (currently the Photographic Center Northwest), any potential university development on the parcel fronting on the pedestrian-designated 12th Avenue will comply with allowed uses per SMC 23.47A.005.D1 or those uses listed above as street activating university uses.”

46. The following sentence shall be added to the end of page 140 as follows:

“Along 12th Avenue, non-street-activating uses shall be limited to no more than 20% of the 12th Avenue street front façade so as not to dominate any block.”

47. Before Seattle University may receive a permit to demolish a structure that contains a residential use and is located in an MIO boundary expansion area approved in this MIMP, or receive a permit to change the use of such a structure to a non-residential major institution use, DPD must find that the University has submitted an application for a MUP for the construction of comparable housing in replacement of the housing to be demolished or changed.

The MUP application(s) for the replacement housing project(s) may not include projects that were the subject of a MUP application submitted to DPD before Council approval of this MIMP. The University may seek City funds to help finance the replacement housing required by this condition, but may not receive credit in fulfillment of the housing replacement requirement for that portion of the housing replacement cost that is financed by City funds. City funds include housing levy funds, general funds or funds received under any housing bonus provision.

For purposes of this condition 47, the comparable replacement housing must meet the following requirements:

- a) Provide a minimum number of units equal to the number of units to be demolished or changed;
- b) Provide no fewer than the number of 2 and 3 bedroom units as those in the units to be demolished or changed;
- c) Contain no less than the gross square feet of the units to be demolished or changed;
- d) The general quality of construction shall be of equal or greater quality than the units to be demolished or changed; and
- e) The replacement housing will be located within the First Hill/Capitol Hill Urban Center and the area east of that center to Martin Luther King Jr. Way."

VII. C. CONDITIONS – SEPA

48. For each future project, Seattle University shall develop a Construction Management Plan that addresses the following air quality, noise, environmental health and transportation impacts as outlined in conditions 44-59.

During Construction for Future Development– Air Quality

49. Site development shall adhere to Puget Sound Clean Air Agency's regulations and the City's construction best practices regarding demolition activity and fugitive dust emissions, including, as necessary:
- a) during demolition, excavation, and construction, sprinkle debris and exposed areas to control dust, cover or wet transported earth material;
 - b) provide quarry spall areas on-site prior to construction vehicles exiting the site;
 - c) wash truck tires and undercarriages prior to trucks traveling on City streets;
 - d) promptly sweep earth tracked or spilled onto City streets;
 - e) monitor truck loads and routes to minimize dust-related impacts;
 - f) use well-maintained construction equipment and vehicles to reduce emissions from such equipment and construction-related trucks;
 - g) avoid prolonged periods of vehicle idling; and
 - h) schedule the delivery and removal of construction materials and heavy equipment to minimize congestion during peak travel time associated with adjacent streets.

During Construction for Future Development – Noise

50. Construction contracts can specify that mufflers be in good working order and that engine enclosures be used on equipment when the engine is the dominant source of noise.

51. Stationary equipment shall be placed as far away from sensitive receiving locations as possible. Where this is infeasible, or where noise impacts are still significant, portable noise barriers shall be placed around the equipment with the opening directed away from the sensitive receiving property. These measures are especially effective for engines used in pumps, compressors, welding machines, and similar equipment that operate continuously and contribute to high, steady background noise levels. In addition to providing about a 10-dBA reduction in equivalent sound levels, the portable barriers demonstrate to the public the contractor's commitment to minimizing noise impacts during construction.
52. Substituting hydraulic or electric models for impact tools such as jack hammers, rock drills and pavement breakers shall be used to reduce construction and demolition noise. Electric pumps shall be specified if pumps are required.
53. Ensure that all equipment required to use backup alarms utilize ambient-sensing alarms that broadcast a warning sound loud enough to be heard over background noise but without having to use a preset, maximum volume. Another alternative is the use of broadband backup alarms instead of typical pure tone alarms.
54. Operators shall be required to lift rather than drag materials wherever feasible to minimize noise from material handling.
55. Construction staging areas expected to be in use for more than a few weeks shall be placed as far as possible from sensitive receivers, particularly residences. Likewise, in areas where construction would occur within about 200 feet of existing uses (such as residences, schools/classrooms, and noise-sensitive businesses); effective noise control measures (possibly outlined in a construction noise management plan) should be employed to minimize the potential for noise impacts. In addition to placing noise-producing equipment as far as possible from homes and businesses, such control shall include using quiet equipment and temporary noise barriers to shield sensitive uses, and orienting the work areas to minimize noise transmission to sensitive off-site locations.
56. Although the overall construction sound levels will vary with the type of equipment used, common sense distance attenuation should be applied. Additionally, effort shall be made by the University to plan the construction schedule to the extent feasible with nearby sensitive receivers to avoid the loudest activities (e.g., demolition or jack-hammering) during the most sensitive time periods (e.g., final exams at the Seattle Academy). A construction noise management plan is the appropriate location to identify these types of conflicts and establish less-intrusive construction schedules.

During Construction for Future Development – Environmental Health

57. Seattle University would complete pre-demolition surveys and applicable asbestos and/or lead abatement activities where required by local, state and federal air quality or worker safety regulations.
58. Seattle University would comply with release reporting, investigation and applicable cleanup provisions of the MTCA regulations for any new contamination discovered during construction activities.

59. Seattle University would perform follow-up testing of the groundwater in the Utility Pole Storage Area on the 1313 East Columbia Street site following removal of the utility poles.

During Construction for Future Development – Transportation

60. The proponent would coordinate with SDOT to minimize impacts caused by construction vehicle traffic. A construction traffic plan for truck deliveries/routes and construction workers would be prepared to minimize disruption to traffic flow on adjacent streets and roadways. This plan would consider the need for special signage, flaggers, route definitions, flow of vehicles and pedestrians during construction and street cleaning.
61. There is both structured parking and surface parking located on the Seattle University campus. It is anticipated that on-campus parking would be used for construction-worker parking during building and renovation projects. Conceivably, other construction workers may park at greater distances from the project site and commute to the site via transit.
62. The proponent would coordinate with Metro transit relative to construction activity that could affect transit service proximate to the project site.
63. Where existing sidewalks or walkways are temporarily closed during construction, alternative routes would be provided to maintain pedestrian circulation patterns.
64. For pedestrian safety, a covered walkway with staging would be provided along portions of 12th Avenue and Madison Street and adjacent to the project site.

Plants

65. The following procedures shall be implemented during redevelopment construction activities:
- a) Where feasible, siting in conjunction with building remodeling and/or new construction associated with planned or potential projects shall attempt to avoid conflicts with significant trees and groves.
 - b) Trees that must be removed to accommodate planned or potential projects shall be replaced consistent with provisions of Chapter 25.11 (SMC) and the adopted Director's Rule that implements DMC 25.11.
 - c) A temporary topsoil erosion and sedimentation control plan and a drainage control plan shall be implemented to mitigate construction-related impacts.
 - d) Landscaped areas affected by construction staging or parking shall be restored to their existing condition or better following construction.

Noise

66. Potential noise impacts could result from new HVAC equipment at the Logan Field parking facility, mechanical equipment associated with new or renovated facilities and new student housing facilities (and associated garbage/recycling collection).
- a) To minimize noise impacts associated with HVAC and air handling equipment, such equipment should be selected and positioned to maximize noise reduction to the extent

possible. When conducting analyses to ensure compliance with the Seattle noise limits, facility designers should assess sound levels as they relate to the nearest residential zones, not just at adjacent commercial locations. More distant residential receivers may present more of a challenge for compliance with the Seattle noise limits due to the 10-dBA reduction in limits during nighttime hours (i.e., between 10PM and 7AM) for these properties.

- b) The exhaust vents proposed for the new Logan Field Garage, care should be taken to select and place these units in such a manner as to protect residential housing on the Seattle University campus just west of the field, as well as at the nearest off-site residences south of the field and East Jefferson Street.
67. With regard to garbage and recycling collection associated with the new student housing facilities, the University should, to the extent feasible, design the collection areas to minimize or eliminate line-of-site to nearby sensitive receivers. In addition, the University shall work with the collection vendors to schedule collections at appropriate (i.e., least intrusive) times.

Light and Glare

68. Lighting design shall consider the selection of luminaires that consist of full-cutoff floodlights in parking lots, athletic fields and other areas.
69. Spill light and light trespass, including direct glare, shall be controlled through lighting design measures such as luminaire locations, light distributions, aiming angles and mounting heights.
70. Building design shall consider the use of less reflective glazing materials to minimize the potential glare impacts to offsite uses.
71. Future new building design shall consider the final orientation and massing of the building on adjacent campus open spaces and offsite residential uses to minimize the potential shadow impacts to these campus resources and offsite uses.

Transportation

72. The MIMP TMP shall adopt a 35% SOV goal to apply to the entire daytime campus population, and shall be updated to include these elements specified in the Master Plan, including the following revisions as laid out in Section 2.4.7 of the FEIS:
- a) A minimum transit subsidy of 50% of the cost of transit passes for faculty and staff and 30% of the cost of commuter student transit passes. (MIMP, page 159-160)
 - b) Increased subsidies for VanPool program participants and additional services to bicycle commuters and pedestrians.
 - c) A more comprehensive marketing program that will promote the program's benefits and opportunities to the campus population on a regular basis.

- d) Parking will be priced so the cost of making a single occupant vehicle commute trip is greater than the cost of making the same trip by transit. It is the difference between the benefit of a subsidized transit pass and the expense of parking fees and vehicle operating costs that will increase the percentage of the campus population that will take transit.
 - e) Continued coordination with First Hill institutions to improve transit access and pursue mutually beneficial programs to reduce single occupant vehicle trips.
 - f) Commitment to link institutional policies for sustainability with trip reduction.
73. The following projects shall require additional traffic analysis and potential mitigation when their associated applications are submitted to DPD:
- Logan Field Garage: Operation of garage accesses, effects of accesses on 12th Avenue and Jefferson. Pedestrian circulation and a new mid-block crossing on Cherry St.
 - Marion Street Garage: Operation of intersection of Marion/12th and potential signalization, pedestrian circulation and safety.
 - Pedestrian Improvements on Madison: Pedestrian volumes, circulation, and safety on Madison corridor. Identification of appropriate pedestrian improvements.
 - 13th Avenue East – traffic calming and/or street narrowing between Columbia & Cherry: The MIMP proposes narrowing and/or traffic calming along this segment of 13th to provide additional pedestrian and landscaping space. Prior to modifying the channelization of the street segment, an analysis should be prepared to evaluate the proposed changes on vehicular and pedestrian circulation, the shifting of traffic volumes to other streets, and their relationship to proposed projects east of 12th.

Signature: (signature on file)
Lisa Rutzick, Senior Land Use Planner
Department of Planning and Development

Date: April 5, 2012

**FINDINGS AND DECISION OF THE HEARING EXAMINER
FOR THE CITY OF SEATTLE**

In the Matter of the Appeal of

ELLEN SOLLOD and WILLIAM ZOSEL

From a decision by the Director of the Department of
Planning and Development

Hearing Examiner File:
MUP-12-013(W)

Department Reference:
3008328

Introduction

The Director, Department of Planning and Development issued a Determination of Adequacy for the Final Environmental Impact Statement on the Seattle University Major Institution Master Plan, and the Appellants timely appealed.

The appeal hearing was held on May 4, 2012 immediately following the hearing on the Major Institution Master Plan (MIMP). A separate recommendation on the proposed MIMP is being issued separately today. Parties represented at the proceeding were: the Appellants, Ellen Sollod and William Zosel, pro se; the Director, Department of Planning and Development, by Lisa Rutzick, Senior Land Use Planner; and the applicant, Seattle University, by Thomas Walsh and Steven Gillespie, attorneys at law. The record was held open through May 10, 2012, for submission of written closing statements and for the Examiner's viewing of the site.

After due consideration of the evidence elicited during the hearing and the Examiner's inspection of the site, the following shall constitute the findings of fact, conclusions and decision of the Hearing Examiner on this appeal.

Findings of Fact

1. The Final Environmental Impact Statement (EIS) for the Seattle University Major Institution Master Plan (MIMP) was issued on June 2, 2011, by the Department of Planning and Development (DPD). DPD issued a Determination of Adequacy on April 5, 2012, and the Appellants timely appealed.

2. SU is located in central Seattle, near the center of First Hill, Cherry Hill, and Capitol Hill. The campus is just east of downtown. The SU Major Institution Overlay (MIO) boundaries generally consist of E. Madison to the north, 14th Avenue to the east, E. Jefferson to the south, and Broadway to the west. The surrounding neighborhood includes a range of residential densities, including the single family homes in Squire Park to the east and south, as well as duplexes and multifamily houses and large apartment buildings. The area is also characterized by other institutions such as hospitals and schools.

3. In the fall of 2007, enrollment at SU was 7,529 students (6,764 FTE). Over the next 20 years, SU expects to grow at an average rate of approximately 100 students per year, to 9,600

Findings and Decision of the Hearing Examiner

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students. To support the growth in enrollment, the number of faculty and staff is expected to grow to 1,500 over the same period. Projected changes to student enrollment and the percentages of students living on campus, is shown on page vii in the MIMP.

4. The current Major Institution Overlay for the University is bounded generally by Broadway to the west, E. Madison to the north, 12th, 14th and 15th Avenues to the east, and E. Jefferson to the south. The area within the MIO boundary, excluding public rights-of-way, is 54.9 acres in size. SU owns approximately 68 percent of the land within the current MIO, while 10 percent is owned by other private entities, and the remaining 22 percent is in public rights-of-way; page 38, MIMP. SU also owns land outside the MIO, including five of the six Logan Court townhomes at 819 and 821 13th Avenue, (which are within the proposed MIO expansion area).

5. The existing campus building area is shown on page 41 of the MIMP. The campus consists of 37 buildings on 48 acres, totaling approximately 2,044,000 gross square feet. Of this total, approximately 850,000 square feet (sf) is academic/classroom; 28,000 sf is religious; 676,000 sf is housing; 291,000 is in student life; and 564,000 sf is support services.

6. The existing MIO district contains three MIO zones: MIO 37, MIO 50 and MIO 105. The underlying zoning within the MIO is shown on page 102 of the MIMP, with a range of commercial and multifamily zones located within the district. A pedestrian overlay district runs along the east side of 12th Avenue, for one block on the west side of 12th Avenue, and on the north half of the MIO's western boundary along Broadway. The University is located within the 12th Avenue Urban Center Village.

7. The current MIMP was approved by the City Council in 1997 as a 15-year plan. The development program in the existing MIMP established a maximum allowable of 2,284,719 gross square feet, of which 2,036,690 gross square feet have been constructed. (This includes five "planned near term projects and renovations," listed on page 44 of the MIMP, which have asterisks indicating they were permitted under the 1997 MIMP.)

8. The proposed MIMP includes an MIO boundary expansion and rezone to change height limits within the MIO, as shown in the MIMP at pages 105-106. The total area within the existing MIO boundary is 54.9 acres. The existing MIO boundary and existing MIO height limits are shown on page 104 of the MIMP.

9. The existing MIO district contains three MIO zones (MIO 37, 50 and 105), and has underlying commercial zoning (C2-65, NC2-40, NC2-65, NC3-64 and NC3-85) and multifamily residential zoning (LR2, LR3 and MR). A pedestrian overlay district is located along the east side of 12th Avenue and for one block along the west side of 12th Avenue, and along the northern half of the MIO's western boundary along Broadway. The locations of the existing underlying zoning designations are shown on pages 106.

10. The proposed boundary expansion area is 2.4 acres, an increase of 4.4 percent over the existing area within the boundary. As shown on page 105, two expansion areas are concentrated along Broadway between E. Columbia Street and E. Jefferson Street, and a third expansion area

centered on E. Marion Street between 12th Avenue and 13th Avenue. The newly included areas are described as Areas A, B and C as shown in Figure 1 on page 3 of DPD's report.

11. The proposed development standards are described in the MIMP at pages 99-127. The Director has recommended modifications to the standards which implement the CAC's recommendations, and SU has agreed to these modifications in the MIMP.

12. Height. The MIMP proposes new MIO height limits, as shown in the MIMP on page 106. Height increases within the existing MIO boundaries would generally retain the 105-foot limit west of 12th, but would allow for increased height limits along Broadway which will reflect the taller buildings and allowed heights in the Swedish First Hill MIO across Broadway. The height limits east of 12th Avenue would include MIO 65 and MIO 37.

13. Following the discussions with the CAC and public comments, and as recommended by DPD, subsequent to the publication of the MIMP, SU proposed to limit the height on 1300 East Columbia Street site to a height limit of 346.3 in elevation as described in DPD's report at pages 35-36. Development on the 1313 E. Columbia Street site would be limited to 345.14 feet in elevation, as described on page 34 of the DPD report

14. Setbacks. The proposed setbacks are shown on page 111 of the MIMP, with modifications proposed by SU in response to public and CAC comments. The modifications increase the upper level setbacks (above 40 feet) from 40 feet to 80 feet on the 1313 East Columbia Street block along 14th Avenue, and from 40 feet to 60 feet on the 1300 East Columbia Street block along 14th Avenue. See DPD Report at page 12, and Ex. 23.

15. The drawings presented by SU at hearing show the building envelopes that have been agreed to by the CAC and SU, and if adopted by City Council, would control the allowable envelopes for future development at the sites.

16. The FEIS for the proposed MIMP examines the proposal and five alternatives. The alternatives are: (1) no student housing; (2) no street/alley vacations; (3) no MIO boundary expansion; (4) no height increase east of 12th Avenue; and (5) no action.

17. The FEIS reviews the impacts to the affected environment in Section III. The land use impacts of the proposed MIMP as well as the above alternatives are examined in the FEIS at pages 3.4-1 through 3-4-50. The FEIS includes an evaluation of the proposal's relationship to other plans, policies and regulations, including the 12th Avenue Development Plan.

18. At hearing, Brodie Bain, SU's project architect, explained the rationale behind the development program and development standards proposed in the MIMP, and the principles of campus planning to which SU is attempting to adhere. In addition, Ms. Bain, Mr. Schwartz and Mr. Lubin provided testimony which described the logistics and economic factors that will affect the location of particular uses and their height.

Findings and Decision of the Hearing Examiner

MUP-12-013(W)

Page 4 of 6

19. Two appeals were filed of the Director's Determination of Adequacy. The appeal of Flo Beaumon and Neighbors of Seattle University (MUP-12-012) was dismissed prior to hearing, although Neighbors participated in the MIMP public hearing. The appeal by Ellen Sollod and William Zosel is the only appeal before the Examiner. That appeal asserted that the EIS failed to adequately disclose reasonable alternatives to the proposal that would minimize adverse impacts; that the FEIS did not consider the effects of height, bulk and scale, traffic and land use impacts, specifically in relationship to the 12th Avenue Plan and the pedestrian environment on 12th Avenue; and that the expansion of boundaries and new development standards is not consistent with the Code.

Conclusions

1. The Hearing Examiner has jurisdiction over this matter pursuant to SMC 23.76.022. The Code directs the Examiner to accord "substantial weight" to the Director's SEPA and design review decisions.

2. The Appellants asserted that the FEIS failed to adequately consider alternatives to the MIO boundary expansions and height increases east of 12th Avenue. The Appellants presented evidence regarding other sites within the existing MIO boundary that they asserted could provide sufficient development capacity so as to make it unnecessary for SU to expand its MIO boundaries or increase the height limits within the boundary. However, the FEIS did include alternatives for "No-MIO boundary expansion" and a "No height increase east of 12th Avenue", and the evaluation of those alternatives was not shown to be inadequate. Although the Appellants clearly desire that the MIMP be revised to exclude expansion and height increases east of 12th Avenue, SEPA does not require that the Appellants' preferences be explored in the FEIS.

3. The appeal asserts that the FEIS is inadequate, because it fails to disclose the impacts of height, bulk and scale of the proposed MIMP. In particular, the Appellants argue that future development at the 1300 and 1313 E. Columbia sites would have significant adverse impacts that were not examined in the FEIS.

4. The FEIS is for a nonproject proposal, and SU argues that the impacts of the potential projects under the approved MIMP should not be considered in this appeal. Certainly, it is not disputed that future development at the 1300 and 1301 E. Columbia sites will be subject to any applicable future project SEPA review by the Director. In addition, a lead agency is to have more flexibility in preparing EISs on nonproject proposals, since there generally is less detailed information available on subsequent project proposals and their impacts; SMC 25.05.442.A.

5. However, this does not mean that future development is never required to be examined. The proposed MIMP and underlying zoning changes constitute a nonproject action that is similar to the rezone considered in *King County v. Washington State Boundary Review Board for King County and City of Black Diamond*, 122 Wn.2d 648, 860 P.2d (1993). There, the Court noted that "a proposed land use related action is not insulated from full environmental review simply because there are no existing specific proposals to develop the land in question or because there

are no immediate land use changes which flow from the proposed action." *Id.* at 663-664. Here, the proposed MIMP and zoning changes will potentially allow different uses and impacts following their adoption, compared with the existing MIMP and zoning.

6. But in this case, even if the impacts of future development at the 1300 and 1313 E. Columbia sites should be considered, it is clear from the evidence that the FEIS is adequate. The FEIS adequately disclosed and evaluated the potential impacts of potential development at those sites, describing impacts from larger building envelopes than those which will be allowed if the City Council imposes the conditions recommended by DPD and the CAC. The evidence presented at hearing regarding height, bulk and scale and shadow impacts, show that the FEIS adequately describes the potential impacts from potential development at these sites.

7. The appeal also argues that the FEIS should have included an analysis of alternative locations for a future event center (which was analyzed as being proposed at the 1313 E. Columbia site) and alternatives to student housing east of 12th Avenue. But the Appellants have presented no legal argument that shows that alternatives analysis for these specific projects, which have not yet been proposed and whose location is not yet certain, is required as part of the MIMP FEIS. No error is shown here.

8. The Appellants also asserted that the FEIS was inadequate for failure to evaluate impacts to the 12th Avenue pedestrian environment, including the proposed MIMP's inconsistency with the 12th Avenue Plan. But the examples cited by the Appellants of existing development along 12th Avenue, was constructed under different development standards that did not acknowledge 12th Avenue, or under the current MIMP, which did not require 12th Avenue frontages to contribute to the streetscape. The FEIS analyzes the proposed MIMP's impacts on 12th Avenue and its consistency with the 12th Avenue Plan, and DPD has relied upon the FEIS to recommend conditions specific to enhancing the 12th Avenue pedestrian corridor. Although reasonable minds may differ about what enhancements should be made, the Appellants' disagreements here are not sufficient to carry their burden of showing that the FEIS is not adequate.

9. The evidence in this record shows that the FEIS is adequate, and therefore the Director's Determination should be affirmed.

Decision

The Director's decision is hereby **AFFIRMED**.

Entered this 4th day of June, 2012.



Anne Watanabe
Deputy Hearing Examiner

Findings and Decision of the Hearing Examiner

MUP-12-013(W)

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Concerning Further Review

NOTE: It is the responsibility of the person seeking to appeal a Hearing Examiner decision to consult Code sections and other appropriate sources, to determine applicable rights and responsibilities.

The decision of the Hearing Examiner on the EIS adequacy appeal is the final decision for the City of Seattle. Under SMC 23.76.052, the time period for requesting judicial review of the environmental determination shall not commence until the Council has completed action on the Type IV decision for which the EIS was issued. A request for judicial review of the decision must be commenced within twenty-one (21) days of the date the decision is issued unless a motion for reconsideration is filed, in which case a request for judicial review of the decision must be commenced within twenty-one (21) days of the date the order on the motion for reconsideration is issued.

The person seeking review must arrange for and initially bear the cost of preparing a verbatim transcript of the hearing. Instructions for preparation of the transcript are available from the Office of Hearing Examiner. Please direct all mail to: PO Box 94729, Seattle, Washington 98124-4729. Office address: 700 Fifth Avenue, Suite 4000. Telephone: (206) 684-0521.

APPLICANT/OWNER

Seattle University
c/o Thomas Walsh and Steven Gillespie
Foster Pepper PLLC
1111 Third Avenue, Suite 3400
Seattle, WA 98101

DEPARTMENT DIRECTOR

Diane Sugimura
Suite 2000, 700 Fifth Avenue
Seattle, WA 98104

APPELLANTS

Ellen Sollod and William Zosel
910 13th Avenue
Seattle, WA 98122

June 18, 2012

Seattle City Council
Planning, Land Use, and Sustainability Committee
C/O City Clerk
Floor 3
600 Fourth Avenue
Seattle, WA 98124-4728

FILED
CITY OF SEATTLE
12 JUN 18 PM 3:40
CITY CLERK

Re: Seattle University Major Institution Master Plan
Rezone of several parcels

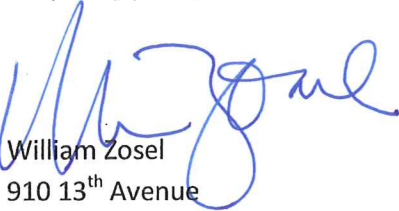
DPD Project No. 3008328

Dear Clerk:

Attached is a copy of a document that is a Notice of Intention to Appear before the City Council as a previously established party of record in this matter, and Notice of Appeal of the Decision of the Director of the Department of Planning and Development/Findings and Recommendation of the Hearing Examiner.

Thank you for your consideration.

Very truly yours,



William Zosel
910 13th Avenue
Seattle, WA 98122
206 329 3986

FILED
12 JUN 18 PM 3:40
CITY CLERK

BEFORE THE CITY COUNCIL
CITY OF SEATTLE

In the Matter of)
Seattle University)
Major Institution Master Plan)

Project No. 3008328

NOTICE OF INTENT TO)
ADDRESS COUNCIL AS)
PARTY OF RECORD/ and)
NOTICE OF APPEAL)
_____)

1. Appellants:

Ellen Sollod 724 15th Ave., Seattle, WA 98122
William Zosel 910 13th Ave., Seattle, WA 98122 (contact person)

2. Decision being appealed

The analysis and decision of the Director of the Department of Planning and Development in the project number 3008328, Seattle University Major Institution Master Plan, and the subsequent Findings and Recommendation of the Hearing Examiner in this matter dated June 4, 2012.

3. Interest in this decision

Ellen Sollod and William Zosel are parties of record in this matter, having filed an appeal with the Hearing Examiner. Also, they are individuals who live in the neighborhood of the project. They would be affected by the degradation of the environment and vitality of the neighborhood and the potential vitality of the neighborhood resulting from the decisions in this case. The appellants are parties intended by law to enjoy the benefits and protection of Seattle's Major Institution Master Plan ordinance.

4. Objections to the decision

The recommendation of the Director of DPD is in violation of the Major Institution Master Plan Land Use Code that explicitly states the purpose and intent to "(e)ncourage the concentration of Major Institution development on existing campuses ...," SMC 23.69.002C, and to "(d)iscourage the expansion of established major institution boundaries," SMC 23.69.002E. The proposed MIMP of Seattle University, recommended for approval by the Director, includes expansion of boundaries and expansion of development standards. Reasonable alternatives for future development exist without the boundary expansion and development standards expansion recommended by the Director of DPD.

The Decision of the Director as recommended for approval by the Hearing Examiner violates the standards for the granting of rezones.

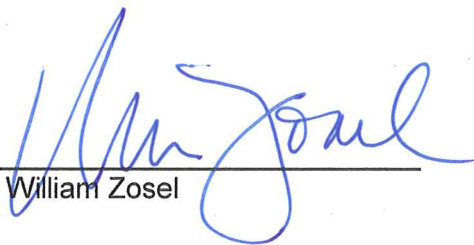
5. Request to Supplement Record

It will be requested that the Council supplement the record with new evidence or information pursuant to the provisions of the Seattle Municipal Code and City Council Resolution 31001

6. Relief requested

- a. Deny the proposed change in development standards (rezone) for the site at 12th Avenue and E. Marion Street (the Photographic Center Northwest site).
- b. Deny the proposed expansion of the boundaries of the Seattle University Major Institution Overlay (MIO)) that would include areas east of 12th Avenue and west of 13th Avenue between E. Columbia Street and E. Spring Street. Alternatively, remand this matter to the Director for further submission of additional information and/or new proposals on the issues of the proposed expansion of the boundaries of the Seattle University Major Institution Overlay (MIO).
- c. Deny the proposed changes in development standards (rezone) for the two blocks bounded by 14th and 13th Avenue on the east and west, and south of E. Marion and north of E. Cherry (the Hospital Central Services laundry and landmark Coca Cola bottling building sites.) Alternatively, remand this matter to the Director for further submission of additional information and/or new proposals on the issues of the proposed changes in the development standards for the sites on those two blocks.
- d. Order the inclusion in the Major Institution Master Plan a requirement that, before Seattle University may develop or occupy for any use any structure within the boundary of the 12th Avenue Urban Village on a site that contains a residential use or a site that is zoned for residential uses, the University must construct housing for non-university use to replace the housing to be displaced or the housing development potential to be displaced.
- e. Order inclusion in a Seattle University Major Institution Master Plan measures that provide advance notice of development plans in a time and manner adequate to serve the goals and purposes of the Major Institution Overlay provisions of the Seattle Municipal Code.

Signed



William Zosel

Dated: June 18, 2012

Received

JUL 26 2012

City of Seattle
Office of the City Clerk

BEFORE THE CITY COUNCIL
OF THE CITY OF SEATTLE

In the Matter of an Application of Seattle
University for Approval of a Major Institution
Master Plan

CF 309092
DPD Project No. 3008328
Hearing Examiner File: MUP-12-013(W)

And the Appeal of Ellen Sollod and William
Zosel of a Recommendation by the Hearing
Examiner for the City of Seattle

APPLICANT SEATTLE UNIVERSITY'S
RESPONSE TO APPEAL

I. INTRODUCTION

Seattle University presents for the Council's review and approval a new Major Institution Master Plan ("MIMP"), a document intended to guide the University's physical development for the next 20 years and beyond. The Citizen's Advisory Committee ("CAC") thoroughly vetted the proposed MIMP over a four-year period and, through compromise and negotiation, reached near-complete agreement with DPD and the University. After a two-day hearing, the Hearing Examiner issued a thoughtful and reasoned analysis of the MIMP, recommending that the Council adopt the MIMP subject to the conditions offered by DPD and agreed to by the University. With one minor exception (relating to replacement housing as described below), there is complete agreement on this proposed MIMP among the University, the CAC members (except for the two Appellants), DPD, and the Hearing Examiner.

The record shows that the issues raised in Mr. Zosel's and Ms. Sollod's appeal statement were carefully discussed and evaluated by the CAC, DPD, and the Hearing Examiner. The

APPLICANT SEATTLE UNIVERSITY'S RESPONSE TO APPEAL -

1

ORIGINAL

FOSTER PEPPER PLLC

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SEATTLE, WASHINGTON 98101-3299
PHONE (206) 447-4400 FAX (206) 447-9700

1 Appellants, both members of the CAC, presented their ideas at several of the 35 CAC meetings
2 occurring during this process. Their contribution and that of the neighbors resulted in compromise
3 positions that protect neighborhood interests. On their appeal points, however, Appellants simply
4 did not prevail in the democratic give-and-take of the CAC process. They issued a minority report
5 (appended to the CAC Report), which DPD and the Hearing Examiner reviewed. The Hearing
6 Examiner recommended against their positions on both factual and legal grounds. Appellants now
7 appeal the Hearing Examiner's recommendations, offering no new reasons why the Council should
8 part company with the CAC, DPD, and the Hearing Examiner.

9 Below, the University responds to Appellants' objections and requests for relief. While the
10 University holds the Appellants in the highest regard and appreciates their dedication to the
11 neighborhood, the University respectfully disagrees with their appeal points. The University
12 respectfully requests that the Council reject the arguments offered in the appeal in favor of the
13 reasoning of the Examiner and DPD, and adopt the MIMP subject to the conditions recommended
14 by each.

15 II. LEGAL AUTHORITY AND ARGUMENT

16 Appellants' arguments should not persuade the Council to reject the Hearing Examiner's
17 decision for three reasons. First, contrary to Appellants' assertion, the MIMP does concentrate
18 future development within the existing campus and does limit MIO expansions. Second, Appellants
19 did not establish error in DPD's point-by-point analysis of the rezone criteria. Finally, Appellants
20 did not offer argument and cannot point to facts that support their various requests for relief. Below,
21 the University responds point by point to Appellants' objections and requests for relief.

22 A. Responding to Appellants' First Objection: The MIMP Complies with Code, and no 23 Reasonable Alternatives Remain Within the Existing Campus

24 Appellants first object that the MIMP does not further the goals of the Land Use Code to
25 encourage concentration of institutional development on existing campuses and minimize MIO
26 expansion:

1 The recommendation of the Director of DPD is in violation of the Major Institution
2 Master Plan Land Use Code that explicitly states the purpose and intent to
3 “(e)ncourage the concentration of Major Institution development on existing
4 campuses ...,” SMC 23.69.002C, and to “(d)iscourage the expansion of established
5 major institution boundaries,” SMC 23.69.002E. The proposed MIMP of Seattle
University, recommended for approval by the Director, includes expansion of
boundaries and expansion of development standards.^{1]} Reasonable alternatives for
future development exist without the boundary expansion and development
standards expansion recommended by the Director of DPD.

6 Appeal at ¶ 4. This objection lacks support for two reasons, discussed in more detail below. First,
7 the record demonstrates that it is factually incorrect. The proposed MIMP does concentrate future
8 development within the existing campus and minimizes expansion of the MIO. Second, the
9 Appellants listed to the Hearing Examiner the “reasonable alternatives for future development”—
10 every site they felt could accommodate the University’s growth. At the hearing, the University
11 explained why each proffered site could not be developed as Appellants anticipated. Appellants’
12 list and the University’s response are set forth below.

13 **1. The MIMP Concentrates Development on the Existing Campus and Limits**
14 **MIO Expansion**

15 In keeping with the policies of the Major Institutions Code, every development project
16 identified in the MIMP is within the current MIO, and the total proposed expansion of MIO area
17 is less than five percent.² With this minimal expansion, the MIMP would accommodate more
18 than double the current campus building floor area and a 36% increase in student population.
19 The Examiner correctly concluded that this combination complies with the MIO policies cited by
20 Appellants.

21
22
23 ¹ Just as they did before the Hearing Examiner, Appellants conflate expansion of MIO boundaries (i.e., lateral
24 expansion) with altered development standards that allow larger development within the existing MIO boundaries
25 (i.e., vertical expansion). The plain language of the Major Institutions Code encourages limitation only to
26 expansions of the MIO boundary, and not, for example, height standards. In fact, the Major Institutions Code
actually encourages vertical expansion, allowing institutions to set taller height limits than otherwise allowed by the
underlying zoning. Otherwise, there would be no way to accommodate institutional growth within MIO boundaries.

² See MIMP at 42-49 (proposed and potential development); 38-39 (proposed MIO boundary expansions).

1 **2. No Reasonable Development Alternatives Exist Within the MIO**

2 Prior to and during the hearing, Appellants listed and discussed the sites they believed
3 could provide the University with additional development capacity in such an amount that no
4 boundary expansions or increases in heights would be necessary east of 12th. However, the
5 University addressed each one, demonstrating why none would work as Appellants had hoped.
6 The Appeal Statement does not offer any new information that would cast doubt on the
7 University's testimony and evidence, which was un-rebutted at the hearing.

8 At the hearing, Appellants discussed three sites not identified in the MIMP as potential
9 development sites that Appellants alleged could accommodate campus growth. *See* Exhibit 26
10 (Shell gasoline station at 12th and Cherry, housing at Broadway and Jefferson, and lot at the
11 southeast corner of Broadway and Columbia). **The University does not own two of these three**
12 **sites and it acquired the third site only recently, after the MIMP was drafted.** As campus
13 planning expert Brodie Bain testified,³ it is unwise to plan for development on properties the
14 University does not own. SU recently acquired the property at Broadway and Columbia, Site A
15 on Exhibit 26. Nevertheless, this site is small, and as Ms. Bain testified, a financially and
16 functionally feasible institutional development site generally requires more lot area than is
17 available at the Broadway and Columbia site. An alley vacation could address the problem, but,
18 as the University's Robert Schwartz testified,⁴ the conditions on the alley vacation at that
19 location may not be satisfied for years, if ever.⁵

20
21
22 ³ Ms. Bain is an architect and planner with 24 years of experience in campus planning, programming, utilization
23 studies, site planning, and pre-designs for campuses, including 18 years focused almost exclusively on higher
education. Ex. 3.

24 ⁴ Mr. Schwartz, the University's Associate Vice President for Facilities, has worked in construction for twenty
years. Ex. 25.

25 ⁵ Among the more difficult conditions is the University's agreement (established with CAC input during this MIMP
26 process) not to seek vacation until all adjacent property owners, including the Kidney Center Northwest, agree to the
vacation.

1 Prior to the hearing, Appellants submitted a document, entitled "Development
2 Alternatives Not Considered by EIS," in which they listed other sites they felt could be
3 developed more intensely. Contrary to Appellants' contentions, all of these sites are either
4 already identified for development or could not meet the University's development needs. The
5 list below includes in **boldface** the site identified by Appellants, followed by an explanation of
6 why Appellants' assertions regarding the development capacity of the sites were mistaken:

- 7 i) **12th Avenue between E Spring and E Marion:** Already identified for a 95,000
8 SF, 105' tall structure (Project #202). The rest of this block contains the recently
9 renovated (and popular with the community) Lee Center for the Arts, as well as a
10 surface parking lot identified as future structured parking under new open space
11 (Project #304).
- 12 ii) **Madison between 11th and 12th:** Already identified for a 75,000 SF structure at
13 105' height in the long term (Project #307).
- 14 iii) **E Madison and 12th Avenue:** Already identified for a 55,000 SF structure at
15 105' height in the near term (Project #106).
- 16 iv) **The Shell Station,** addressed above, not owned by the University.
- 17 v) **Broadway and Columbia,** addressed above, recently acquired but not feasible
18 due to lot size constraints.
- 19 vi) **All sites within the MIO along Broadway:** The MIMP identifies several for
20 development, including project #206 (350,000 SF at 160') and Project #308
21 (discussed above). SU does not own the Kidney Center, nor does it own property
22 on Broadway south of E James.
- 23 vii) **Developing to the height limit on all sites west of 12th Avenue:** As Ms. Bain
24 testified, the allowed height limits are not necessarily intended to accommodate
25 buildings. University campuses require open space and architectural features,
26 such as clock towers. However, academic buildings generally should not exceed
four stories because they rely on elevators for student movement between classes
which is discouraged in campus planning. Also, building above roughly 4-5
stories requires a more expensive construction type.
- viii) **13th Avenue between E Columbia and E Marion:** The University owns only a
portion of one of the five lots on the block. That portion is currently in functional
student housing, and SU expects that to be the case for some time.

Finally, one of Appellants' witnesses discussed three other sites that the MIMP did
identify for development, but which he felt could be developed more intensely. Project #201, at
Columbia and [vacated] 10th, is currently slated for a 100,000 SF academic building at 65' of

1 height in the MIO-105 zone. Ms. Bain's un-rebutted testimony established that academic
2 buildings generally should not exceed four or five stories, as discussed above. Project #204, at
3 12th and Marion, is currently planned for 120,000 SF at 75', also in the MIO-105 zone. Once
4 again, good campus planning restricts the height of this academic structure. In addition, the
5 testimony established that building taller structures requires the use of steel-and-concrete
6 construction rather than the "five over two" or "five over one" technique of wood-frame
7 construction over one or two concrete stories, which makes the structures markedly more
8 expensive. Finally, project #308 at Broadway and Madison is planned for 100,000 SF at 65',
9 within the MIO-160 zone. Ms. Bain testified that building to 160' height may not make sense at
10 this highly visible and heavily traveled intersection. It is already elevated above the rest of
11 campus, so a taller building would dominate its surroundings, including a large open space that
12 surrounds the 45' tall administration building to the east.

13 In short, although the Appeal Statement asserts that reasonable development alternatives
14 exist, the overwhelming weight of the evidence presented at the hearing established that there are
15 constraints on development capacity west of 12th, and the Appellants' proposed alternatives do
16 not exist. The record supports the Examiner's recommendations.

17 **B. Response to Objection #2: Appellants Have Not Stated a Challenge to Rezone Criteria**
18 Appellants allege:

19 The Decision of the Director as recommended for approval by the Hearing Examiner
20 violates the standards for the granting of rezones.

21 Appeal Statement at ¶ 4. We assume that what Appellants mean by this allegation is that the MIMP
22 violates the rezone criteria of the code, since that is what they alleged to the Hearing Examiner. The
23 rezone criteria are listed at SMC 23.34.008 (general rezone criteria) and .124 (major institution
24 overlay rezone criteria). Appellants' allegation is not supported by the analysis or the facts in the
25 record.
26

1 DPD's analysis of the proposal's compliance with rezone criteria consumed fourteen single-
2 spaced pages in the Director's Report, which explained how the proposal satisfies each and every
3 criterion. See DPD Report at 42-56. The Hearing Examiner approved this analysis, adopting it by
4 reference at Conclusion ¶ 12. The Appeal Statement does not describe how these analyses failed to
5 address any criterion, and offers the Council no reason to disturb the Examiner's conclusions.⁶

6 **C. The Council Should Deny Appellants' Requests for Relief**

7 Below, the University addresses each of Appellants' requests for relief in the order in which
8 Appellants presented them.

9 **1. Responding to Request for Relief (a) and (b): The MIO Boundary Expansions**
10 **East of 12th Avenue Properly Anticipate Future SU Development Needs**

11 Appellants' first two requested relief items each ask the Council to deny the requested
12 expansion of the University's MIO east of 12th Avenue. Request (a) objects to the expansion to
13 include the Photographic Center,⁷ while Request (b) objects to other expansion areas between 12th
14 and 14th. In total, these MIO expansions would add about 1.2 acres of land, or slightly more than
15 2% of the existing MIO.⁸

16 While the University does not currently have any plans to acquire or develop the
17 Photographic Center site or any other properties within the expansion areas east of 12th, they are the
18 logical locations for future University expansion. Because the MIMP contains no expiration date
19 and is intended to guide campus development for at least twenty years, it makes sense to expand the
20 MIO at this time to allow for the possibility that the University may someday acquire the property
21

22 _____
23 ⁶ In their written closing statement to the Hearing Examiner, Appellants did discuss some of the rezone criteria. The
24 table attached as Appendix A to this Response lists the rezone criteria Appellants cited to the Hearing Examiner, the
Appellants' argument to the Examiner, and the University's response.

25 ⁷ The Photographic Center is a school and art gallery at the northeast corner of 12th and Marion

26 ⁸ The MIMP includes an expansion area of similar size on the west side of campus along Broadway. Appellant does
not object to the western expansion area.

1 within the expansion area and use it to accommodate University growth. Such expansion preserves
2 flexibility for the University's future development.

3 The City has in the past created this type of flexibility by allowing MIO expansion to
4 incorporate target properties for which the University has no immediate development plans or
5 ownership interest. For example, the 1997 MIMP expanded the University's MIO to include the
6 Hospital Laundry at 1300 E Columbia. The University did not then and does not now own the
7 property, and the 1997 MIMP did not identify any development at the site (neither does the
8 proposed MIMP). Nevertheless, the City Council approved the expansion to provide the
9 University with exactly the sort of flexibility it now seeks by expanding the MIO to include the
10 Photographic Center.

11 This topic was discussed extensively before the CAC, which approved the expansions. As
12 the Examiner wrote:

13 The minor expansion would remove the irregular edge that currently exists and
14 would provide opportunities for improvements in edge conditions. The many
15 recommended conditions in the DPD report appropriately balance the University's
need for the minor expansion with protection of the residential edge and pedestrian
environments east of 12th Avenue

16 Conclusion 4. The appeal statement offers no explanation regarding why this analysis is
17 incorrect.

18 The University views the Photographic Center site as critical to eventual campus
19 development. It sits at the northeast corner of the intersection of 12th and Marion, the main point
20 of entry to the campus. The expansion area that includes the Photographic Center was originally
21 slated to include the entire block of 12th Avenue between Marion and Spring Streets, but in
22 response to public comment, the University scaled it back to the single site at the northeast corner of
23 the intersection. The University currently owns the other three corners, all of which are already
24 within the MIO. Bringing this fourth corner within the MIO preserves the possibility that, if the
25 University eventually acquires the Photographic Center site at some point within the life of the
26

1 MIMP, it can develop to the standards set out in the MIMP and use that corner to help reinforce the
2 entrance to the University.

3 The expansion to include properties east of the Photographic Center along Marion similarly
4 preserves the possibility of University development that responds to market opportunities. The
5 University already owns some property within this expansion area—five out of the six Logan Court
6 townhomes on the south side of Marion. The MIMP does not identify this site, or any other portion
7 of the expansion areas, for future development. Nevertheless, as with the Photographic site, this
8 area is a logical location for eventual institutional expansion.

9 The appeal statement does not establish that the Examiner's conclusions regarding
10 expansion were incorrect. There is simply no justification in the record for abandoning the
11 Examiner's analysis. The challenged expansion area adds only 1.2% of the total MIO area
12 (compared to the development program, which will more than double campus building area) and
13 includes no identified proposed or potential development projects. This complies with the
14 directive of the Code of concentrating development within current MIOs and discouraging
15 expansion. The University respectfully requests that the Council reject Appellants' position.

16 **2. Responding to Request (c): The Proposed Development Standards at the 1300**
17 **and 1313 E Columbia Sites Properly Balance Institutional Needs with**
Neighborhood Concerns

18 Appellants' Request (c) addresses development standards—specifically the allowable
19 building envelopes—at the 1300 and 1313 E Columbia sites (the Hospital Laundry and the Coca-
20 Cola building, respectively). These sites border 14th Avenue, which at that location marks the
21 eastern boundary of the MIO. Across 14th Avenue is property zoned Lowrise multifamily,
22 currently in single family use. Appellants ask the Council to either deny the changes or remand for
23 additional information or proposals.

24 The question of development standards for these sites generated the most discussion and the
25 most compromise of any single topic the CAC addressed. *See* Findings 55-56; Conclusions 6-9.
26 As the record demonstrates, the University greatly reduced its proposed building envelopes in

1 response to neighborhood concerns.⁹ The University initially proposed a significantly larger
2 building envelope—65-foot height limits with no setbacks.¹⁰ After hearing neighborhood and CAC
3 concerns, the University proposed 10-foot ground-level setbacks, then 15-foot ground-level
4 setbacks combined with 25-foot upper-level setbacks. Just prior to “final” MIMP approval, the
5 CAC approved the 15-foot ground-level/40-foot upper-level setbacks eventually included in the
6 final MIMP. After final MIMP publication, however, the neighborhood proposed yet greater upper-
7 level setbacks—120 feet on the east side of the two sites and on the north side of the 1300 block. In
8 response, SU proposed an 80-foot upper-level setback at the 1313 site. At the 1300 site, SU
9 proposed upper-level setbacks of 60 feet on the eastern side and 40 feet on the north. The CAC
10 voted to approve these building envelopes. These concessions cost the University a significant
11 amount of hoped-for program space, but the University was (and remains) committed to them.

12 The un-rebutted evidence at the hearing demonstrated that the CAC-approved building
13 envelopes would create minimal, if any, impacts on the neighborhood when compared to the
14 development capacity of the underlying zoning. *See* Conclusion 8. As the Hearing Examiner
15 noted, the relevant comparison is not between current, as-built conditions and the new, agreed-
16 upon zoning envelope, as Appellants appear to presume. *See* Conclusion 6. Rather, the relevant
17 comparison is between the building envelopes allowed by the underlying zoning and those
18 allowed under the compromise. *See* Conclusion 8. The University’s evidence demonstrated that,
19 from the sidewalk on the east side of 14th or from the first floor of the houses uphill across 14th,
20 a hypothetical building constructed to the fullest extent of the agreed-upon building envelope at
21 1313 would not be visible behind a hypothetical building constructed to the fullest extent
22 allowed by the underlying zoning, and only the top few inches would be visible at 1300. *See*

24 ⁹ *See* Testimony of Brodie Bain (explaining compromise); Exhibit 4 (graphic depictions of proposed setbacks
25 through the years).

26 ¹⁰ The underlying zoning would allow wall heights of 36-46 feet with minimal (or no) setbacks. *See* SMC
23.45.514.

1 Exhibit 23. The University also demonstrated that the increased shadow impacts were similarly
2 minimal or non-existent. *Id.* On the strength of this evidence and her own expertise in campus
3 master planning, Ms. Bain testified that the new building envelopes would produce (a) no impact
4 to neighbors of 1313 E Columbia and (b) only insignificant impact to neighbors of 1300 E
5 Columbia. No meaningful response was presented to this evidence.

6 There is no reason for the Council to undo all the work that went into the compromise
7 building envelopes at the 1300 and 1313 sites. As the Examiner concluded, they properly balance
8 the University's need for expansion against impacts to the neighborhood. No evidence in the record
9 would support either an outright rejection of the development standards or a remand.

10 **3. Responding to Request (d): The Housing Replacement Condition Properly**
11 **Implements Code Requirements**

12 In Request (d), Appellants ask the Council to impose significant new housing replacement
13 conditions:

14 Order the inclusion in the Major Institution Master Plan a requirement that, before
15 Seattle University may develop or **occupy for any use** any structure **within the**
16 **boundary of the 12th Avenue Urban Village** on a site that contains a residential
17 use or a site that is zoned for residential uses, the University must construct
housing **for non-university use** to replace the housing to be displaced or the
housing development potential to be displaced.

18 Appeal Statement at ¶ 5.d (emphasis added).

19 Hearing Examiner's Condition 47—proposed by DPD and agreed upon by the University—
20 requires the University to replace housing in MIO expansion areas when it is (a) demolished or (b)
21 converted to non-residential major institution uses. Condition 47 leaves for project-level permitting
22 the question of whether institutional housing (e.g., faculty/staff or student housing) can be
23 considered “comparable” replacement housing. The CAC, by contrast, recommended replacement
24 even if the University retains the existing housing in residential institutional uses, expressly
25
26

1 disallowing student housing to be considered “comparable.” Recommendation 19.¹¹ Concluding
2 that the DPD condition found support in the Code, the Examiner adopted Condition 47 unchanged.
3 Examiner’s Conclusion 13.

4 Appellants now ask the Council not only to reach the opposite conclusion, but to go even
5 farther than the CAC would have. Appellants request that the University construct housing to
6 replace both housing and “housing development potential” lost to University use or development
7 anywhere within the 12th Avenue Urban Village (not just MIO expansion areas). Appellants’
8 request would require the University to expand, rather than simply preserve, the City’s housing
9 stock. These requests exceed the requirements of City code.

10 Condition 47, similar to the Code provision it implements, pertains only to replacement
11 of housing within MIO expansion areas and requires no replacement of existing structures that
12 remain in residential institutional use. The Code reads:

13 **New or expanded boundaries** shall not be permitted where they would result in
14 the demolition of structures with residential uses or change of use of those
15 structures to **non-residential** major institution uses unless **comparable**
replacement is proposed to maintain the housing stock of the city.

16 SMC 23.34.124.B.7 (emphasis added). The plain language of this Code section reveals its
17 scope: housing in MIO expansion areas. In contrast, Appellant’s request would require housing
18 replacement anywhere within the MIO (indeed, anywhere within the 12th Avenue Urban
19 Village).¹² Additionally, under the Code’s plain language, if an institution acquires a dwelling
20 unit in an MIO expansion area and decides to rent it to faculty, staff, or students—a residential
21 major institution use—there is no need to also “replace” it. Appellants’ request, however, would
22

23 ¹¹ These represented the only points of disagreement between the University and its CAC. The University, the CAC,
24 and DPD reached agreement on every other point presented in the MIMP, the DPD Report, and the CAC Report.

25 ¹² Although Appellants frame their request as requiring replacement anywhere within the 12th Avenue Urban
26 Village, which is larger than the MIO, practically speaking, the request is limited to the MIO. SU could not
demolish housing outside of the MIO but within the 12th Avenue Urban Village because major institutions are
prohibited from demolishing housing outside, but within 2,500 feet of, their MIO without the approval of an adopted
MIMP. SMC 23.69.022.A.3. The proposed MIMP does not identify any projects outside of the MIO.

1 require SU to construct replacement housing even if the University retains existing residential
2 structures in residential use. As the Examiner concluded, the law does not support these
3 propositions.

4 A condition requiring replacement of lost housing development potential—such as that
5 requested by Appellants—goes well beyond the Code requirements.¹³ Nothing in the Code
6 requires major institutions to “replace” housing that never existed. The parking lot east of the
7 Photographic Center (north side of Marion, mid-block between 12th and 13th) provides an
8 example. Were the University to acquire and develop this property, the loss of this use would
9 properly be analyzed as a loss of parking, not a loss of the housing that could have replaced the
10 parking. Requiring the University to construct additional housing to compensate for lost
11 potential cannot qualify as “comparable replacement” under any reasonable interpretation of the
12 phrase.

13 A necessary extension of Appellants’ argument regarding institutional uses is that student
14 housing can never constitute “comparable replacement” housing, a position that lacks support in law
15 or logic. Both the SMC and Condition 47 are silent on the question, and the Hearing Examiner
16 expressly rejected such a broad reading of the Code. Conclusion 13. Like the section of the SMC
17 it implements, Condition 47 intentionally does not clarify what sort of housing would constitute
18 “comparable replacement” housing. By leaving the question unaddressed in the Code, the
19 Council expressed its legislative intent to allow DPD to decide on a case-by-case, project-level
20 basis what constitutes “comparable replacement” housing. Condition 47 reflects an
21 understanding of the usefulness of such flexibility in a master planning document such as the
22 MIMP. Appellants ask the Council to limit the type of housing that DPD could consider
23
24

25 ¹³ Indeed, a condition requiring the University to replace housing that never existed would likely violate the
26 University’s rights under both state statute (such as RCW 82.02.020) and the state and federal constitutions (the
takings clauses of the 5th Amendment to the Federal Constitution and Art. 1, § 16 of the State Constitution).

1 “comparable,” but nothing in their appeal should convince the Council (in its quasi-judicial
2 capacity) to remove flexibility it itself created in its legislative wisdom.

3 As the University of Washington’s Rob Lubin testified at the hearing, student housing
4 provides myriad benefits to the community and actually increases the housing stock of the City.
5 Mr. Lubin described his experience with similar student housing expansions at the University of
6 Washington, where the UW saw density increase fourfold, that is, the UW housed four students
7 for every dwelling unit it demolished. When these students move into university housing, they
8 vacate other housing in the area. Because of these benefits and many more, there is no reason to
9 prohibit, at the non-project stage, the use of student housing as “comparable replacement”
10 housing.

11 Acting in its quasi-judicial capacity, the Council cannot excise the phrase “non-
12 residential” from the Code, nor can it conclude that the Code would require housing replacement
13 outside of MIO expansion areas. Sound policy requires the determination of what constitutes
14 “comparable replacement” housing to be left for the project review stage. The Council should
15 adopt Condition 47 unchanged.

16 **4. Responding to Request (e): The University will Comply with all Public Notice**
17 **Requirements of the SMC**

18 Finally, for the first time on appeal, Appellants request that the Council adopt a condition
19 requiring “advance notice” of development projects:

20 Order inclusion in a Seattle University Major Institution Master Plan measures that
21 provide advance notice of development plans in a time and manner adequate to serve
the goals and purposes of the Major Institution Overlay provisions of the Seattle
Municipal Code.

22 Appeal Statement at ¶ 6(e). The issue of notice to the public was not raised before the Hearing
23 Examiner, so the record is devoid of facts which could support the addition of a condition
24 mandating additional public notice requirements.

25 The Seattle Municipal Code carries with it a number of public notice requirements for
26 project permitting, and given the lack of facts in the record on this point, Appellants cannot

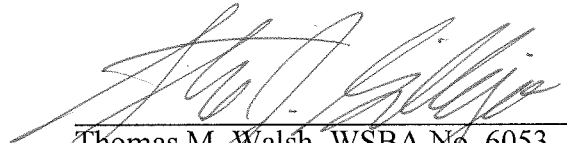
1 demonstrate that these notice requirements fail in their purpose. In this void of factual support,
2 Appellants cannot prove that the current requirements are inadequate or that the University will not
3 comply with them in the absence of a MIMP condition. The University has no intention of violating
4 the public notice requirements of the SMC, and there is no reason to impose additional conditions.

5 III. CONCLUSION

6 The University respectfully requests that the Council follow the Examiner's
7 recommendations and adopt the MIMP subject to the conditions contained in the DPD Report.

8 DATED this 26th day of July, 2012.

9 FOSTER PEPPER PLLC

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11 _____
12 Thomas M. Walsh, WSBA No. 6053
13 Steven J. Gillespie, WSBA No. 39538
14 Attorneys for Applicant
15 Seattle University
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**APPENDIX A: UNIVERSITY RESPONSE TO APPELLANTS' WRITTEN CLOSING
ARGUMENTS REGARDING COMPLIANCE WITH REZONE CRITERIA**

Rezone Criteria (SMC)	Appellants' Written Closing Arguments	University Response and DPD Report Citation
23.34.124.B.1: Establishment or modification of boundaries shall take account of the holding capacity of the existing campus and the potential for new development with and without a boundary expansion.	DPD Report did not analyze holding capacity or potential for new development without expansion.	No holding capacity in existing campus: Appellants' proposed alternative development sites do not have the capacity Appellants allege. Also, all development under current MIMP already completed. DPD Report addressed criterion at 52.
23.34.124.B.5, .6: Preferred locations for boundaries shall be streets, alleys or other public rights-of-way. Configuration of platted lot lines, size of parcels, block orientation and street layout shall also be considered. 6. Selection of boundaries should emphasize physical features that create natural edges such as topographic changes, shorelines, freeways, arterials, changes in street layout and block orientation, and large public facilities, land areas or open spaces, or green spaces.	Boundary on Marion does not follow right-of-way or natural features	Proposed boundary follows platted lot lines, complying with plain language of Code. Current boundary does not follow right-of-way, so no difference. DPD Report addressed at 53-54, noting all MIO boundaries are on rights-of-way or platted lot lines. No distinguishing physical features create natural edges in area
23.34.124.C.1: Increases to height limits may be considered where it is desirable to limit MIO district boundary by expansion.	No justification for height increase at Photographic Center.	Height increase is minimal and in line with most other heights along 12th Avenue. Boundary expansion is minimal when considered in light of the increases in student counts and floor area. DPD Report addressed at 55.
23.24.124.C.2: Height limits at the district boundary shall be compatible with those in the	Photographic Center will be only property over 40' for	Inaccurate statement. MIMP proposes 65' height limits for length of 12th Avenue. Also,

1 adjacent areas.	2 blocks in either direction 3 65' heights at 1300/1313 not 4 compatible with neighboring 5 residential heights	6 property one block north has 7 65' heights. 8 65' is "compatible" with the 9 limited area of 40' heights 10 north of Photographic Center. 11 Tiered upper-level setbacks at 12 1300/1313 E Columbia make 13 limits as compatible with 14 surrounding LR zoning as the 15 current height limits of the 16 underlying zone. 17 DPD Report addressed at 55.
9 23.34.124.C.3: Transitional 10 height limits shall be provided 11 wherever feasible when the 12 maximum permitted height 13 within the overlay district is 14 significantly higher than 15 permitted in areas adjoining the 16 major institution campus.	17 No transitional height between 18 Photographic Center and 19 adjacent site. 20 No transition provided at 21 1300/1313 E Columbia sites	22 65' height provides transition 23 from 105' and 160' heights 24 further west. No need to 25 provide additional transition 26 because 65' is not "significantly higher" than 40'. Tiered upper-level setbacks at 1300/1313 provide adequate transition. See section drawing at Ex. 26. DPD Report addressed at 55.
16 23.24.009.D (height limits in 17 commercial or industrial zones)	18 Directive language requires 19 compatible height limits and 20 gradual transitions in height, 21 scale, and level of activity.	22 Section is not applicable: 23 MIMP sets height limits for 24 Major Institution Overlay, not 25 for underlying commercial 26 zoning.
19 23.34.008.E.3.b: Boundaries 20 between commercial and 21 residential areas shall generally 22 be established so that 23 commercial uses face each 24 other across the street on which 25 they are located, and face away 26 from adjacent residential areas. An exception may be made when physical buffers can provide a more effective separation between uses.	MIMP calls for non-residential uses at 1300/1313 E Columbia that do not comply with criteria.	Section is not applicable: 1300/1313 are not MIO expansion areas; they are already within the existing MIO. DPD Report addressed at 47.
23.34.008.E.1: The impact of more intensive zones on less	Non-residential uses on 1300 E Columbia are prohibited absent	This is a pre-existing situation not altered by the MIMP.

intensive zones or industrial and commercial zones on other zones shall be minimized by the use of transitions or buffers, if possible. A gradual transition between zoning categories, including height limits, is preferred.	a buffer to the residential uses to the north.	Commercial use currently operating at 1300 E Columbia has no buffer to properties to the north. DPD Report addressed at 46-47.
23.34.008.D.2: Council adopted neighborhood plans that apply to the area proposed for rezone shall be taken into consideration.	Proposal fails to recognize that 12th Avenue Plan calls for rezone of 1300/1313 E Columbia from commercial to lowrise to promote residential development.	MIMP took 12th Avenue Plan into account and does not change zoning. Residential is one of the potential uses at 1300/1313 sites. DPD Report evaluated specific 12th Ave Plan criteria at 44-45.

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Lisa Rutzick
City of Seattle, DPD
700 – 5th Ave., Ste. 2000
Seattle WA 98124

DATED this 25th day of July, 2012


Helen M. Stubbert, Legal Assistant

RECEIVED

AUG 02 2012

BEFORE THE CITY COUNCIL
CITY OF SEATTLE

SEATTLE CITY COUNCIL

In the Matter of
Seattle University
Major Institution Master Plan

CF 309092

REPLY OF APPELLANTS TO
TO APPLICANT'S RESPONSE TO
NOTICE OF APPEAL

The Appellants, William Zosel and Ellen Sollod submit the following in reply to the Response of Applicants to the Notice of Appeal.

1. Failure of the Decision to comply with SMC 23.69.002

In its Responsive document, Seattle University fails to respond to the argument of Appellants that the proposed Major Institution Master Plan does not comply with SMC 23.69.002. The Major Institution Master Plan sections of the Seattle Municipal Code allow institutions to develop and expand with development standards and uses not allowed to others in residential and commercial zones. However, in return for this privilege the City Council, in SMC 23.69.002 has promised that such development will be concentrated so as to minimize the impact on the ability of neighborhoods adjacent to institutions to grow and thrive.

Seattle University has shown no reason whatsoever for expanding its boundaries to include the blocks between 12th and 13th Avenue centered on E. Marion Street (the Photographic Center site and the residential lots to the south of E. Marion Street and north of E. Columbia Street.) In a Master Plan that describes planned and potential future development projects for the next twenty years, there is no suggestion that any part of these blocks will be developed by for the University. The only purpose expressed is to achieve the ability to prevent development by others.

On the other hand, the Central Area Plan for the 12th Avenue Urban Center Village and the Mayor's 12th avenue Development Plan make it clear that a thriving "urban village" with opportunities for growth and vitality for all members of the community requires that properties such as these in the heart of the hoped-for "main street" of the urban village not be set aside for some future possible institutional use. The City has expended significant resources to return similar properties on and near 12th Avenue to non-institutional control and to support non-institutional development.

The record upon which the Director of the Department of Planning and Development and the Hearing Examiner made their decisions disregards the loss of development capacity that the University's land banking proposal represents. The Environmental Impact Statement in this matter barely noted the impact on the urban village's vitality presented by institutional land banking and did not seriously examine the ability of the University to grow and thrive without expanding on and east of 12th Avenue.

At the Hearing the University's expert did state her opinion that the institution really couldn't take advantage of existing on-campus locations. That opinion should appropriately have been presented to

the Director of DPD before the Director's decision so it could be considered and analyzed. The Director failed to inquire into and weigh the most important issues involved in the proposed MIMP.

It is the job of the Director of the Department of Planning and Development to examine the University's arguments before making a decision. This should have been the job of DPD's Environmental Impact Statement. That investigation did not take place. It is now the job of the City Council to ask whether or not the City's interest in a growing vital urban village and the University's needs can be served without the proposed boundary expansion east of 12th Avenue.

If the clearly stated purpose of SMC 23.69.002 that commercial and residential neighborhoods should be guaranteed adequate land to grow and thrive is not held to bar institutional boundary expansion here where there is no stated purpose other than the prevention of other development, then it is difficult to know what meaning that Code provision has. The Appellants are asking that the City Council to affirm the intent expressed in the legislation enacted by its predecessors.

The Appellants ask the City Council not to approve a MIMP which is based on a record which contains next to no discussion or consideration of the needs of the urban village for future growth.

The Applicant, at the hearing, advanced its argument that it would be burdensome to be required to expand within the footprint and height limits already granted to it west of 12th Avenue. The Appellants believe that it is the City Council's responsibility to stand up for the needs of the rest of the stakeholders in the urban village and for the City's interest in a thriving and growing urban village. The University's arguments related to the alleged burdens of growing within sites west of 12th Avenue should be fully examined.

2. Replacement of Lost Housing Potential

In the proposed boundary expansion area east of 12th Avenue that is zoned for residential development, the Appellants are asking the following: If the University chooses to build anything other than housing, or to build housing for students and not staff or faculty, it be required to provide replacement housing somewhere else in the 12th Avenue Urban Village.

This is not unduly burdensome on the University. In its proposed MIMP the University makes no claim that it has a need to develop student housing in the proposed boundary expansion areas east of 12th Avenue. Rather, it claims that the hundreds of units of student housing it may require can, in fact, be provided elsewhere.

On the other hand, there is an important City policy to encourage development of housing for the rest of us in the heart of the 12th Avenue urban village, within the area that is zoned for more intense development.

The balance of interests is this: On one hand, there is no alleged need by the University to satisfy its student housing requirements within the proposed expansion area. On the other hand, there is the policy of the Comprehensive Plan and the Central Area Plan for additional housing in this area. It is within the power of the City Council to put in place a provision in the MIMP that encourages Seattle University to develop student housing where it says it intends to do so, and discourages the displacement of housing opportunities for others.

In its response the University continues to argue, as it did at the hearing, that student housing "provides myriad benefits to the community and actually increases the housing stock of the City." Well yes, but this misses the point. The City at large and the neighboring community are best served if there is both new student housing and new housing for others. It is the position of the University, apparently that there cannot be both student housing and more non-student housing in the 12th Avenue urban village.

The University in its Response characterizes the Appellants' position as one of requiring the University to expand, rather than preserve, the City's housing stock. That is a mischaracterization. Rather, it is the

University's position that the City should be required to decrease its capacity to develop --- for no stated reason.

The example the University cites in its Response relates to that part of the Photographic Center Northwest property immediately to the east of the building and which is currently a parking lot. The parking lot use at this time is a non-conforming use within the LR3 zone. If the University were to acquire and develop the property it would constitute the loss of dozens of potential housing units, not the loss of a parking lot as the University argues.

Urban centers are intended to have a mix of commercial activity and employment along with a range of housing types suitable for diverse populations. There is no justification in the University's proposal to expand its boundaries east of 12th Avenue that would support a loss of these key sites to future non-institutional development.

3. Failure of the Decision of the Director to Comply with Rezone Criteria

The Applicant Seattle University's Response to Appeal, Appendix A outlines the specific allegations of the Appellants regarding the failure of the decision of the Director of DPD to observe and follow the Land Use Codes' several rezone criteria. The attempts by the Applicant to refute those allegations fail on their face.

Plainly, the Applicant has asked for the extraordinary privilege of rezones allowing additional height on discrete portions of two blocks. If the Applicant's request were granted it would be allowed a height increase while those properties immediately adjacent --- with no separation of street, alley, or elevation change --- would be limited to a lower height. In fact, the University would be able to develop to a height that is more than 60% greater than the property immediately adjacent to the lot line. This is not insignificant. The Applicant's requested zone boundaries would, as it states, follow platted lot lines. However, while following platted lot lines is necessary, it is not sufficient to meet the requirements of the Code. The argument that all of the considerations other than platted lot lines should be ignored must not be true.

DATED August 1, 2012

A handwritten signature in black ink that reads "William Zosel" with a stylized flourish at the end.

by William Zosel

for Appellants William Zosel and
Ellen Sollod

CERTIFICATE OF MAILING

I certify that on the 2 day of August, 2012, I sent copies of the foregoing document (including this Certificate of Service) by first class mail, by depositing the copies in the U.S. mail with proper postage affixed, or electronically at the addresses listed below.

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I certify under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 2 day of August, 2012, at Seattle, Washington



Name